

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

Joseph M. Strickland, Master in Equity

Case No.: 2016-CP-49-6794

Mathes Auto Sales, Inc.

Respondent/Appellant

v.

Otis Morris, Jr., Pro Bowl Motors, Inc., Travelers Casualty & Surety Co., of America, Inc.; Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC, Defendants, of whom Otis Moore, Jr., Pro Bowl Motors, Inc., Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC are the Appellants/Respondents.

RECORD ON APPEAL

Volume III

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Motors.

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STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

MATHES AUTO SALES, INC.,)

Plaintiff,)

v.)

NEXTGEAR CAPITAL, INC., OTIS)
MORRIS, JR., PRO BOWL MOTORS,)
INC., TRAVELERS CASUALTY &)
SURETY CO. OF AMERICA, INC.,)
TARICA WORTHY, S.C. STATE)
FEDERAL CREDIT UNION, DIXON'S)
AUTOMOTIVE, LLC, AUTO-OWNERS)
INSURANCE, INC., and MANHEIM)
REMARKETING, INC.,)

Defendants.)

IN THE COURT OF COMMON PLEAS

CASE NO.: 2016-CP-40-6794

AMENDED COMPLAINT

FILED
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JEANNETTE W. MCBRIDE
C.C.P. & G.S.

The Plaintiff above named, complaining of the Defendants herein, would respectfully show unto the court:

PARTIES

1. The Plaintiff is a corporation organized and existing pursuant to the laws of the State of South Carolina, maintaining offices and agents and conducting its corporate business in the County of Florence, State of South Carolina.

2. Upon information and belief, Defendant, Nextgear Capital, Inc. ("Nextgear"), is a foreign corporation organized and existing pursuant to the laws of the State of Indiana, but conducts business in the State of South Carolina.

3. Upon information and belief, Defendant, Otis Morris, Jr. ("Morris"), is a resident of Richland County, South Carolina.

4. Upon information and belief, Defendant, Pro Bowl Motors, Inc. ("Pro Bowl"), is a corporation organized and existing pursuant to the laws of the State of South Carolina, maintaining

2017-02-01

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offices and agents and conducting its corporate business in the County of Richland, State of South Carolina.

5. At all times herein mentioned, Defendant Pro Bowl acted through its officer, agent, and employee, Defendant Morris.

6. Upon information and belief, Defendant, Travelers Casualty & Surety Co. of America, Inc. ("Travelers"), is a foreign corporation organized and existing pursuant to the laws of a State other than the State of South Carolina, but conducts business in South Carolina.

7. Upon information and belief, Defendant, Tarica Worthy ("Worthy"), is a resident of Richland County, South Carolina.

 8. Upon information and belief, Defendant, S.C. State Federal Credit Union is a corporation organized and existing pursuant to the laws of the State of South Carolina, maintaining offices and agents and conducting its corporate business in the county of Richland, State of South Carolina.

9. Defendant, Dixon's Automotive, LLC ("Dixon's"), is a limited liability company organized and existing pursuant to the laws of the State of South Carolina, maintaining offices and agents and conducting its corporate business in the County of York, State of South Carolina.

10. Upon information and belief, Defendant, Auto-Owners Insurance, Inc. ("Auto-Owners"), is a corporation organized and existing pursuant to the laws of a State other than the State of South Carolina, but conducts business in South Carolina.

11. Upon information and belief, Defendant, Manheim Remarketing, Inc. ("Manheim"), is a corporation organized and existing pursuant to the laws of a State other than the State of South Carolina, but conducts business in South Carolina.

12. Upon information and belief, Defendant Nextgear and Manheim are owned and controlled by Cox Automotive, Inc., a foreign corporation based in Atlanta, Georgia.

13. This court has jurisdiction over the parties and subject matter of this action.

BACKGROUND

14. The Plaintiff is a licensed motor vehicle dealer.

15. Upon information and belief, Defendant Dixon's is a licensed motor vehicle dealer.

16. Upon information and belief, Defendant Auto-Owners is the surety providing indemnification for loss or damages caused by Defendant Dixon's pursuant to S.C. Code Ann. § 56-15-320.

17. Defendant Morris is the owner of Defendant Pro Bowl. Upon information and belief, Defendant Pro Bowl was formerly licensed as a motor vehicle dealer.

18. Defendant Travelers was the surety providing indemnification for loss or damages caused by Defendant Pro Bowl pursuant to S.C. Code Ann. § 56-15-320.

19. Upon information and belief, Defendant Morris is now employed by another dealer. Defendant Morris has never been employed by the Plaintiff.

20. John Mathes, the owner and registered agent for the Plaintiff, and Defendant Morris have been friends for over twenty years. They previously authorized one another to purchase vehicles on each other's behalf through Defendant Manheim's automobile auction business, but had never done so before this cause of action arose.

21. Upon information and belief, Defendant Nextgear is engaged in the business of providing inventory financing to motor vehicle dealers.

22. The Plaintiff and Defendant Nextgear are parties to a written contract by which the Defendant provides inventory financing for the Plaintiff.

23. Defendant Nextgear also provides inventory financing for Defendant Dixon's.

24. Defendant Manheim operates an automobile auction center in Darlington, South Carolina.

FACTUAL ALLEGATIONS

25. On or about May 17, 2016, Defendant Dixon's purchased a 2014 Infiniti QX60 (VIN: 5N1ALOMM6EC502540) ("the vehicle") from Reeves Import Motor Cars, Inc. at an auction in Florida.

26. Defendant Dixon's subsequently entrusted possession of the vehicle to Defendants Morris and Pro Bowl.

27. By and through Pro Bowl, Defendant Morris sold the vehicle to Defendant Worthy for \$36,026.00.

28. Defendant Worthy wrote a check payable to Defendant Pro Bowl for \$20,000, representing the downpayment, and financed the remaining balance of \$16,026.00 through SC State Federal Credit Union.

29. Thereafter, Defendant Morris convinced Defendant Worthy to entrust the vehicle to Defendant Pro Bowl so that he could purportedly register the vehicle and acquire a license tag.

30. Defendant Morris instead listed the vehicle for sale in an online auction with Defendant Manheim in Florence, South Carolina on behalf of Defendant Dixon's.

31. The Plaintiff soon discovered that its account with Defendant Nextgear was charged the sum of \$35,368.00 for the purchase of the vehicle from Defendant Dixon's on August 16, 2016.

32. Upon information and belief, Defendant Morris purchased the vehicle from Dixon's with the Plaintiff's line of credit without its permission or consent.

33. Defendant Manheim's records include an alert that the sales price exceeded Defendant Manheim's normal price range.

34. Although the Plaintiff's account with Defendant Nextgear had already been charged, it quickly alerted Defendant Manheim that the transaction was fraudulent before Manheim had transferred the funds to Defendant Dixon's.

35. Despite the Plaintiff's instructions to the contrary, Defendant Manheim thereafter transferred the funds to Defendant Dixon's account.

36. The sums advanced by Defendant Nextgear exceeded contractual limits for legitimate purchases of vehicles by the Plaintiff, and resulted in the Plaintiff's account balance surpassing its maximum credit allowance.

37. The Plaintiff has never possessed the vehicle or its certificate of title, yet Defendant Nextgear contends that the Plaintiff is responsible for the sum of \$35,368.00 Defendant Nextgear purportedly advanced toward the fraudulent transaction.

38. Upon information and belief, Defendant Worthy has possession of the vehicle, and Defendant Nextgear has possession of the certificate of title.

FOR A FIRST CAUSE OF ACTION
(Declaratory Judgment)

39. Each and every previous allegation is realleged herein in the same and to the same extent as if repeated herein.

40. This cause of action is brought pursuant to the Uniform Declaratory Judgments Act set forth at S.C. Code Ann. § 15-53-10, et seq. (2005).

41. A controversy exists among the parties regarding their rights and obligations under S.C. Code Ann. §36-2-403, as well as the inventory financing contract between the Plaintiff and Defendant Nextgear.

42. Based upon the foregoing, the Plaintiff is informed and believes that it is entitled to a declaratory judgment that Defendant Dixon was the owner of the vehicle subject to a floor plan lien and security interest in favor of Defendant Nextgear; that Defendant Dixon entrusted possession of the vehicle to Defendant Morris, who was a merchant who dealt in goods of the kind; that by allowing Defendant Morris to have possession of the vehicle, Defendant Dixon and Defendant Nextgear gave Defendant Morris the power to transfer title to Defendant Worthy, a buyer in the

ordinary course of business; that any further attempt to transfer ownership of the vehicle by anyone other than Defendant Worthy was void; and, as a result, the Plaintiff has no liability to Defendant Nextgear whatsoever for any sums advanced in connection with the fraudulent transaction between Defendant Dixon's, Defendant Morris, and Defendant Pro Bowl.

43. The Plaintiff is further informed and believes that it is entitled to a reasonable award of attorney's fees and costs as provided by S.C. Code Ann. § 15-53-100 (2005).

FOR A SECOND CAUSE OF ACTION
(Unfair Trade Practices)

44. Each and every allegation set forth above is realleged herein in the same manner and to the same extent as if repeated.

45. The misappropriation of the Plaintiff's line of credit by Defendants Morris and Pro Bowl was unfair and deceptive in the conduct of trade or commerce, and exposed the Plaintiff to liability for funds expended towards the fraudulent purchase of a vehicle that had already been sold to Defendant Worthy.

46. As a result, the Plaintiff suffered the loss of its credit line with which it purchased inventory, lost profits, and was charged \$35,368.00 by Defendant Nextgear for the fraudulent purchase of the vehicle.

47. Upon information and belief, Defendants Morris and Pro Bowl have engaged in similar conduct before, and it is capable of repetition.

48. Defendants Morris and Pro Bowl's unfair and deceptive acts were a willful and knowing violation of S.C. Code Ann. § 39-5-20.

49. Based upon the foregoing, the Plaintiff is informed and believes that it is entitled to judgment against Defendants Morris and Pro Bowl, for actual and treble damages pursuant to S.C. Code Ann. § 39-5-140, interest at the rate of 8 ¾ % pursuant to S.C. Code Ann. § 34-31-20, and a reasonable award of attorney's fees and costs.

FOR A THIRD CAUSE OF ACTION
(Dealers Act)

50. Each and every allegation set forth above is realleged herein in the same manner and to the same extent as if repeated.

51. Defendant Morris was the owner of Pro Bowl Motors and was acting as an agent for Pro Bowl Motors when it was entrusted with the vehicle.

52. Upon information and belief, Pro Bowl was a licensed motor vehicle dealer.

53. Said Defendants' wrongful appropriation of the Plaintiff's credit line to buy the vehicle from Defendant Dixon's was arbitrary, in bad faith, and unconscionable in violation of S.C. Code Ann. 56-15-40(1).

54. Said Defendants' actions caused the Plaintiff to suffer damages, including the loss of its credit line, lost profits, and attorney's fees.

55. Based upon the foregoing, the Plaintiff is informed and believes that it is entitled to double actual damages, punitive damages not to exceed three times its actual damages pursuant to S.C. Code Ann. § 56-15-110, prejudgment interest at the rate of 8 ¾ % pursuant to S.C. Code Ann. § 34-31-20, and a reasonable award of attorney's fees and costs from said Defendants, as well as Defendant Travelers.

FOR A FOURTH CAUSE OF ACTION
(Dealers Act)

56. Each and every allegation set forth above is realleged herein in the same manner and to the same extent as if repeated.

57. Defendant Dixon's entrustment of the vehicle to Defendant Morris and Defendant Pro Bowl was an unfair and deceptive act that was also arbitrary, in bad faith, and unconscionable under S.C. Code Ann. § 56-15-40(1).

58. Based upon the foregoing, the Plaintiff is informed and believes that it is entitled to

double actual damages, punitive damages not to exceed three times its actual damages pursuant to S.C. Code Ann. § 56-15-110, prejudgment interest at the rate of 8 ¾ % pursuant to S.C. Code Ann. § 34-31-20, and a reasonable award of attorney's fees and costs from Defendant Dixon's, as well as Defendant Auto-Owners.

FOR A FIFTH CAUSE OF ACTION
(Conversion)

59. Each and every allegation set forth above is realleged herein in the same manner and to the same extent as if repeated.

60. Defendants Morris and Pro Bowl wrongfully appropriated the Plaintiff's line of credit with Defendant Nextgear to purchase the vehicle from Defendant Dixon's for \$35,368.00.

61. Said Defendants were not authorized to assume and exercise rights of ownership over the Plaintiff's line of credit without express permission.

62. Only the Plaintiff had the right to exercise dominion and control over the funds in the account.

63. As a result, the Plaintiff has been charged \$33,368.00 by Defendant Nextgear for the fraudulent purchase.

64. Based upon the foregoing, the Plaintiff is informed and believed that it is entitled to judgment against Defendants Morris and Pro Bowl for actual and punitive damages.

FOR A FIFTH CAUSE OF ACTION
(Negligence)

65. Each and every allegation set forth above is realleged herein in the same manner and to same extent as if repeated.

66. Defendant Manheim had a duty to exercise reasonable care towards its customers, including the Plaintiff, in the course of operating an online automobile auction.

67. Once the Plaintiff discovered that its credit line had been debited for the fraudulent

transaction, but before the funds had been transferred to Defendant Dixon's, the Plaintiff notified agents and employees of Defendant Manheim that it had not authorized the transaction, and instructed them not to transfer the funds.

68. Defendant Manheim breached its duty of reasonable care by transferring the funds anyway.

69. As a direct and proximate result of Defendant Manheim's breach, the Plaintiff suffered a loss of \$35,368.00.

70. Based upon the foregoing, the Plaintiff is informed and believes that it is entitled to judgment against Defendant Manheim for actual and punitive damages.

JS
1/17/17
- **WHEREFORE**, the Plaintiff prays for a declaratory judgment, for an award of actual and punitive damages, for a reasonable award of attorney's fees, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

J. GREGORY STUDEMEYER
Professional Corporation

J. Gregory Studemeyer
J. Gregory Studemeyer

1701 Richland Street

P.O. Box 12201

Columbia, S.C. 29211-2201

(803) 779-3363

Attorney for Plaintiff

Columbia, South Carolina

February 1 , 2017

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS

MATHES AUTO SALES, INC.,)
)
Plaintiff,)
)
v.)

ANSWER OF DIXON'S AUTOMOTIVE, LLC.

C.A. No. : 2016- CP40-6749

NEXTGEARS CAPITAL, INC., OTIS)
MORRIS, JR., PRO BOWL MOTORS,)
INC., TRAVELERS CASUALTY &)
SURETY CO, OF AMERICA, INC.,)
TARICA WORTHY, S.C. STATE)
FEDERAL CREDIT UNION, DIXON'S)
AUTOMOTIVE, LLC, AUTO-OWNERS)
INSURANCE, INC. and MANHEIM)
REMARKETING, INC.,)
)
Defendants.)

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COMES NOW THE DEFENDANT, DIXON'S AUTOMOTIVE, LLC. by and through its undersigned attorney, and does answer the Amended Complaint of the Plaintiff as follows:

1. All matters set forth in the Amended Complaint of the Plaintiff which are not hereinafter addressed are specifically denied and Defendant demands strict proof thereof.
2. Defendant does admit to the allegations set forth in paragraphs 9, 13, 15, 21, 23, 25, 26 of Plaintiff's Amended Complaint.
3. Defendant is without sufficient knowledge or belief to form an opinion as to the allegations set forth in paragraphs 1, 14, 17, 18, 19, 24, 27, 28, 29, 31, 33, 34, 36, 37, 38, 40, 41, 42, 43, of the Amended Complaint and therefore demands strict proof thereof.

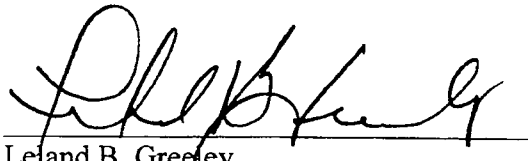
4. Defendant admits only so much of paragraph 30 as alleges that the vehicle was listed with Manheim in Florence, South Carolina for purchase.
5. Defendant admits only so much of paragraph 32 as alleges that the vehicle was purchased.
6. Defendant admits only so much of paragraph 35 as alleges that Manheim transferred funds to Dixon's account.
7. Defendant does not respond to paragraphs 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 20, 22, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, and 70 of the Amended Complaint for such paragraphs do not pertain to Defendant Dixon.
8. The remaining allegations of the Amended Complaint are denied by Defendant Dixon.

FOR A SECOND DEFENSE

9. Defendant Dixon asserts that the allegations of the Plaintiff in this amended Complaint have failed to state a cause of action against the Defendant for which relief may be grants.

WHEREFORE, the Defendant Dixon, having fully answered the Amended Complaint of the Plaintiff, prays this Court to dismiss this action against the Defendant and award to the Defendant all costs and attorney's fees in having to defend the same.

Respectfully submitted,



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Attorney for Dixon Automotive, LLC.

April 6, 2017

Rock Hill, South Carolina.

000436

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

) IN THE COURT OF COMMON PLEAS

) CASE NO. 2016-CP-40-06794

MATHES AUTO SALES, INC.,

Plaintiff,

v.

OTIS MORRIS, JR., PRO BOWL MO-
TORS, INC., TRAVELERS CASUALTY &
SURETY CO. OF AMERICA, INC., GER-
ALD SCOTT DIXON, MICHAEL TYRONE
MOORE, and DIXON'S AUTOMOTIVE,
LLC,

Defendants.

ORDER ON POST-TRIAL MOTIONS

On June 20, 2018, the Court issued an order for judgment in this matter¹. Therein, the Court granted the Plaintiff's motion and supplemental motion to conform the pleadings to the evidence to add Gerald Scott Dixon ("Dixon") and Michael Tyrone Moore ("Moore") as party defendants; awarded actual damages to the Plaintiff of \$35,368.00 doubled as mandated by S.C. Code Ann. Section 56-15-110(1) to \$70,736.00; concluded that the Plaintiff was entitled to a reasonable award of attorney's fees as mandated by S.C. Code Ann. Section 56-15-110(1); and awarded punitive damages of \$212,208.00, a sum not exceeding three times the actual damages as authorized by S.C. Code Ann. Section 56-15-110(2).

On June 26, 2018, the Plaintiff filed an attorney's fee affidavit. Attached thereto as exhibits were an email from counsel for the Plaintiff to Defendant, Otis Morris, Jr. ("Morris"), a slip summary listing by user, and a slip listing setting forth time spent and expenses incurred in this matter.

On July 2, 2018, Defendants, Dixon, Moore, and Dixon's Automotive, LLC ("Dixon's Automotive"), filed a motion to amend order; the Plaintiff filed a motion for attorney's fees and costs and a motion to alter or amend; and Defendants, Morris and Pro Bowl Motors, Inc. ("Pro Bowl"), filed a notice of motion and motion to amend findings and judgment pursuant to Rule 52 and notice of motion and motion to amend judgment pursuant to Rule 59, SCRPC. On July 3, 2018, Defendant, Travelers Casualty & Surety Co. of America, Inc. ("Travelers"), filed a motion to alter or amend a

¹ A summary of the facts is set forth in this Court's Order Granting Motion For Attorney's Fees And Costs.

judgment and motion for relief from judgment.

This matter came before me on January 3, 2019, for a hearing on all post-trial motions. J. Gregory Studemeyer and Ryan G. Studemeyer were present on behalf of the Plaintiff. H. Ronald Stanley was present on behalf of Morris and Pro Bowl. Leland B. Greeley was present on behalf of Dixon, Moore, and Dixon Automotive.

In its motion, Travelers requested that the Court alter or amend the order for judgment insofar as it related to any finding against Travelers and that the Court otherwise relieve it from the order. The basis of Travelers motion was that it had settled and resolved the Plaintiff's claims against it prior to trial. The Plaintiff's motion to alter or amend also sought in part to vacate the order inadvertently entered against Travelers on the same grounds. Neither counsel for Dixon, Moore, and Dixon Automotive nor counsel for Morris and Pro Bowl objected to Travelers' motion. On that basis, Travelers' motion to alter or amend a judgment and motion for relief from judgment was GRANTED.

In their motion to amend order, Dixon, Moore, and Dixon Automotive sought reconsideration of the Court's prior grant of the Plaintiff's motion to amend the pleadings to conform to the evidence adding Dixon and Moore as parties defendant. Dixon Automotive also sought reconsideration of its motion to dismiss at trial. Likewise, Dixon and Moore sought dismissal of claims against them in their individual capacities and all three of these Defendants raised additional issues on the burden of proof, setoff, malice, and the Court's authority to award punitive damages without a jury. After considering the arguments of counsel, the motion to amend order on behalf of Dixon, Moore, and Dixon Automotive was DENIED.

Next, the Court considered the Plaintiff's motion for attorney's fees and costs. After considering the arguments of counsel, Plaintiff's motion for attorney's fees and costs was GRANTED. The award of attorney's fees and costs will be addressed in a separate order.

Next, the Court considered the Plaintiff's motion to alter or amend. Therein, the Plaintiff sought reconsideration of this Court's award of actual damages. In addition to the damages awarded, the Plaintiff sought lost profits of \$130,326.96. After considering arguments of counsel, the Plaintiff's motion to alter or amend was DENIED.

Finally, the Court considered the motion to amend findings and judgment of Defendants, Morris and Pro Bowl. Therein, Morris and Pro Bowl urged the Court to setoff any settlements between the Plaintiff and Nextgear Capital, Inc. and the Plaintiff and Travelers against any award of actual damages in favor of the Plaintiff before doubling or trebling the award. After considering arguments of counsel, the motion of Morris and Pro Bowl was DENIED.

IT IS THEREFORE ORDERED that judgment be entered in favor of the Plaintiff against Otis Morris, Jr., Pro Bowl Motors, Inc., Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC for the sum of \$70,736.00 in actual damages and \$212,208.00 in punitive damages.

IT IS FURTHER ORDERED that judgment in favor of the Plaintiff against Travelers be, and the same hereby is, vacated.

IT IS FURTHER ORDERED that the motion to amend order of Dixon, Moore, and Dixon Automotive is DENIED.

IT IS FURTHER ORDERED that the Plaintiff's motion for attorney's fees and costs is GRANTED and will be addressed in a separate order.

IT IS FURTHER ORDERED that the Plaintiff's motion to alter or amend is DENIED.

IT IS FURTHER ORDERED that the motion to amend findings and judgment of Morris and Pro Bowl is DENIED.

AND IT IS SO ORDERED.

Joseph M. Strickland
Richland County Master in Equity

Columbia, South Carolina

This ____ day of January, 2019



Richland Common Pleas

Case Caption: Mathes Auto Sales Inc vs Nextgear Capital Inc , defendant, et al
Case Number: 2016CP4006794
Type: Order/Supplemental Proceedings Order

It is so Ordered

s/Joseph M. Strickland, 3055

Electronically signed on 2019-01-26 10:02:25 page 4 of 4

1-28-2019

000440

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND) CASE NO. 2016-CP-40-06794

MATHES AUTO SALES, INC.,)

Plaintiff,)

v.)

OTIS MORRIS, JR., PRO BOWL)
MOTORS, INC., TRAVELERS CASUALTY)
& SURETY CO. OF AMERICA, INC.,)
GERALD SCOTT DIXON, MICHAEL)
TYRONE MOORE, and DIXON'S)
AUTOMOTIVE, LLC,)

ATTORNEY'S FEE AFFIDAVIT

Defendants.

Personally appeared before me, J. Gregory Studemeyer, who first being duly sworn, deposes and says:

1. He is a licensed attorney practicing primarily in Columbia, South Carolina.
2. He was admitted to the Bar of the State of South Carolina on November 5, 1982.
3. A substantial portion of his practice relates to commercial litigation and he enjoys an AV rating with Martindale-Hubbell.
4. He is the attorney for the Plaintiff in the above referenced action.
5. Attached hereto and incorporated herein by reference as Exhibit A is a copy of an email from the undersigned to Defendant, Otis Morris, Jr., dated September 30, 2016. At that time, the undersigned had only spent 6.2 hours and had only incurred \$18.00 in expenses addressing the Plaintiff's claims.
6. Attached hereto and incorporated herein by reference as Exhibit B is a copy of the undersigned's Slip Summary Listing by User summarizing attorney's fees of \$97,237.24

based upon 286.10 hours at a rate of \$285.00 per hour for the undersigned and 76.10 hours at a rate of \$150.00 for his associate and costs of \$4,283.74 from September 12, 2016, through June 4, 2016.

7. Attached hereto and incorporated herein by reference as Exhibit C is a copy of The undersigned billing entries corresponding with his Slip Summary Listing by User referred to above.

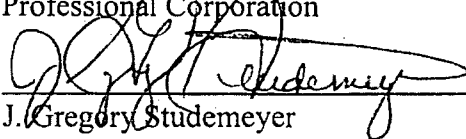
8. In addition to the above, the undersigned spent 3.4 hours from June 20, 2018, through June 25, 2018, reviewing the Order for Judgment, reviewing his file, reviewing his billing records, preparing this affidavit, and filing same.

9. Based upon the foregoing the undersigned requests an award of attorney's fees of \$98,206.24 and costs of \$4,283.74.

The undersigned is competent to testify to the foregoing matters and would so testify if presented as a witness at a hearing in this matter.

FURTHER THE DEPONENT SAYETH NOT.

J. GREGORY STUDEMEYER
Professional Corporation


J. Gregory Studemeyer
1701 Richland Street
Post Office Box 12201
Columbia, South Carolina 29211-2201
(803) 779-3363
Attorney for Plaintiff

SWORN to before me this 26th
day of June, 2018


Notary Public for South Carolina

My commission expires: 2/23/18

Greg Studemeyer

From: "Greg Studemeyer" <gesquire54@gmail.com>
Date: Friday, September 30, 2016 10:26 AM
To: <otismorris@mcdanielsgroup.com>
Cc: <YAZMIN200@aol.com>
Subject: Fw: John Mathes and Mathes Auto Sales, Inc.

From: Greg Studemeyer
Sent: Friday, September 30, 2016 10:13 AM
To: otismorris@mcdanielsgroup.com
Cc: YAZMIN200@aol.com
Subject: John Mathes and Mathes Auto Sales, Inc.

Otis:

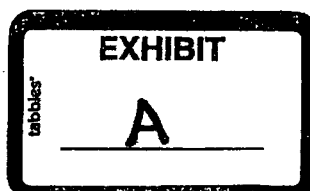
You and I have known each other for a long time.

I have been contacted by John Mathes regarding a 2014 Infiniti that belongs to Tarica Worthy that you apparently attempted to sell in an online auction under someone else's name and charged against John's line of credit without his permission or consent. I have also spoken with Ms. Worthy and her attorney and am preparing requests for information to SCDMV. I have also contacted State Credit Union. I have not yet completely figured out what you have done, but please know that I am on your trail.

I urge you to come clean. You know as well as I do that the best way to get out of a hole is to stop digging.

Greg

J. Gregory Studemeyer
Attorney at Law
1701 Richland Street
P.O. Box 12201
Columbia, South Carolina 29211-2201



000443

Selection Criteria

Slip Classification Open
Clie Selection Include: Mathes Auto Sal

Title	Amount	% Total	Time	% Total
JGS				
Fees: Slip Value	82621.50	87.86%	289.90	79.21%
Fees: Billable	81538.50	87.72%	286.10	78.99%
Fees: Unbillable	1083.00	100.00%	3.80	100.00%
Fees: Billed Slip Value	81538.50			
Fees: Profitability	(1083.00)	-1.31%		
Fees: % Gain	-1.25%			
Fees: Overhead	0.00			
Fees: % Overhead	0.00%			
Fees: Estimated			0.00	
Fees: Variance			0.00	
Fees: % Variance			0.00%	
Costs: Slip Value	4283.74	100.00%		
Costs: Billable	4283.74	100.00%		
Costs: Unbillable	0.00	0.00%		
Costs: Billed Slip Value	4283.74			
Costs: Profitability	0.00	0.00%		
Costs: % Gain	0.00%			
Total: Slip Value	86905.24	88.39%	289.90	79.21%
Total: Billable	85822.24	88.26%	286.10	78.99%
Total: Unbillable	1083.00	100.00%	3.80	100.00%
Total: Billed Slip Value	85822.24			
Total: Profitability	(1083.00)	-1.25%		
Total: % Gain	-1.25%			
Total: Overhead	0.00			
Total: % Overhead	0.00%			
Total: Estimated			0.00	
Total: Variance			0.00	
Total: % Variance			0.00%	
RGS				
Fees: Slip Value	11415.00	12.14%	76.10	20.79%
Fees: Billable	11415.00	12.28%	76.10	21.01%
Fees: Unbillable	0.00	0.00%	0.00	0.00%
Fees: Billed Slip Value	11415.00			
Fees: Profitability	0.00	0.00%		
Fees: % Gain	0.00%			
Fees: Overhead	0.00			
Fees: % Overhead	0.00%			
Fees: Estimated			0.00	
Fees: Variance			0.00	
Fees: % Variance			0.00%	
Costs: Slip Value	0.00	0.00%		
Costs: Billable	0.00	0.00%		
Costs: Unbillable	0.00	0.00%		

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Slip Summary Listing by User

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Title	Amount	% Total	Time	% Total
Costs: Billed Slip Value	0.00			
Costs: Profitability	0.00	0.00%		
Costs: % Gain	0.00%			
Total: Slip Value	11415.00	11.61%	76.10	20.79%
Total: Billable	11415.00	11.74%	76.10	21.01%
Total: Unbillable	0.00	0.00%	0.00	0.00%
Total: Billed Slip Value	11415.00			
Total: Profitability	0.00	0.00%		
Total: % Gain	0.00%			
Total: Overhead	0.00			
Total: % Overhead	0.00%			
Total: Estimated			0.00	
Total: Variance			0.00	
Total: % Variance			0.00%	
Grand Total				
Fees: Slip Value	94036.50	100.00%	366.00	100.00%
Fees: Billable	92953.50	100.00%	362.20	100.00%
Fees: Unbillable	1083.00	100.00%	3.80	100.00%
Fees: Billed Slip Value	92953.50			
Fees: Profitability	(1083.00)	-1.15%		
Fees: % Gain	0.00%			
Fees: Overhead	0.00			
Fees: % Overhead	0.00%			
Fees: Estimated			0.00	
Fees: Variance			0.00	
Fees: % Variance			0.00%	
Costs: Slip Value ~	4283.74	100.00%		
Costs: Billable	4283.74	100.00%		
Costs: Unbillable	0.00	0.00%		
Costs: Billed Slip Value	4283.74			
Costs: Profitability	0.00	0.00%		
Costs: % Gain	0.00%			
Total: Slip Value	98320.24	100.00%	366.00	100.00%
Total: Billable	97237.24	100.00%	362.20	100.00%
Total: Unbillable	1083.00	100.00%	3.80	100.00%
Total: Billed Slip Value	97237.24			
Total: Profitability	(1083.00)	-1.10%		
Total: % Gain	-1.10%			
Total: Overhead	0.00			
Total: % Overhead	0.00%			
Total: Estimated			0.00	
Total: Variance			0.00	
Total: % Variance			0.00%	

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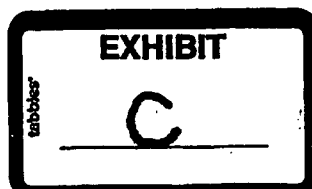
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Selection Criteria

Slip Classification Open
Clie. Selection Include: Mathes Auto Sal

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
<u>Transaction Date: 1/27/2016</u>								
57879	TIME			RGS	1.60	150.00	240.00	240.00
	1/27/2016			Review/Revise	0.00	C		
Billed	G:8861	2/1/2017		Mathes Auto Sal	0.00			
Revised Amended Complaint per JGS.				Morris. Otis	0.00			
Total: 1/27/2016								
				Billable	1.60		240.00	240.00
				Unbillable	0.00		0.00	
				Total	1.60		240.00	
<u>Transaction Date: 9/12/2016</u>								
56639	TIME			JGS	1.30	285.00	370.50	370.50
	9/12/2016			Conference	0.00	C@1		
Billed	G:8716	10/3/2016		Mathes Auto Sal	0.00			
Office conference with John Mathes and David Hall regarding fraudulent purchase of vehicle using client's credit line; prepared matter sheet.					0.00			
56642	TIME			JGS	0.50	285.00	142.50	142.50
	9/12/2016			Phone to client	0.00	C@1		
Billed	G:8716	10/3/2016		Mathes Auto Sal	0.00			
Made telephone call to client to follow up (RCSD directed him to begin with Florence County Sheriff's Dept. and will do so in the morning); reviewed file; prepared correspondence to Travelers on client's behalf.				Morris. Otis	0.00			
Total: 9/12/2016								
				Billable	1.80		513.00	513.00
				Unbillable	0.00		0.00	
				Total	1.80		513.00	
<u>Transaction Date: 9/15/2016</u>								
56676	TIME			JGS	0.30	285.00	85.50	85.50
	9/15/2016			Review Corres.	0.00	C@1		
Billed	G:8716	10/3/2016		Mathes Auto Sal	0.00			



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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Reviewed email from client and responded with recommendations to gather documentation.	Morris. Otis	0.00			
Total: 9/15/2016					
	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	
Transaction Date: 9/18/2016					
56711	TIME	JGS	0.10	285.00	28.50
9/18/2016	Review document		0.00	C@1	28.50
Billed	G:8716	10/3/2016	Mathes Auto Sal	0.00	
Reviewed Incident Report and copy of certificate of Title faxed by client.	Morris. Otis	0.00			
56708	TIME	JGS	0.20	285.00	57.00
9/18/2016	Phone fr client		0.00	C@1	57.00
Billed	G:8716	10/3/2016	Mathes Auto Sal	0.00	
Received telephone call from John Mathes (discussed status of matter).	Morris. Otis	0.00			
Total: 9/18/2016					
	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	
Transaction Date: 9/27/2016					
56792	TIME	JGS	0.20	285.00	57.00
9/27/2016	Review Corres.		0.00	C@1	
Billed	G:8716	10/3/2016	Mathes Auto Sal	0.00	
Reviewed email from client; returned telephone call to John Mathes (discussed call from girl who paid Otis Morris \$20,000 for vehicle); reviewed Buyer's Order faxed by client.	Morris. Otis	0.00			
Total: 9/27/2016					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 9/28/2016					
56814	TIME	JGS	0.30	285.00	85.50
9/28/2016	Review Corres.		0.00	C@1	85.50
Billed	G:8716	10/3/2016	Mathes Auto Sal	0.00	
Reviewed email from client; made telephone call	Morris. Otis	0.00			

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
to Tarica Worthy.					
56823	TIME	JGS	0.10	285.00	28.50
9/28/2016	Review Corres.		0.00	C@1	
Billed	G:8716 10/3/2016	Mathes Auto Sal	0.00		
Reviewed email from client and responded to same.					
Total: 9/28/2016					
	Billable	0.40		114.00	114.00
	Unbillable	0.00		0.00	
	Total	0.40		114.00	
Transaction Date: 9/29/2016					
56842	TIME	JGS	0.30	285.00	85.50
9/29/2016	Phone fr client		0.00	C@1	
Billed	G:8716 10/3/2016	Mathes Auto Sal	0.00		
Received telephone call from Breon Walker (discussed status of case).					
Total: 9/29/2016					
	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	
Transaction Date: 9/30/2016					
56847	TIME	JGS	2.20	285.00	627.00
9/30/2016	Review File		0.00	C@1	
Billed	G:8716 10/3/2016	Mathes Auto Sal	0.00		
Reviewed file; made telephone call to client (not available; left message on voice mail); received telephone call from client (discussed status of matter and plans to proceed with full court press; confirmed that client did not have certificate of title); prepared email to Otis Morris; prepared letter of representation to Dixon's Automotive.					
56852	TIME	JGS	0.70	285.00	199.50
9/30/2016	Phone to client		0.00	C@1	
Billed	G:8716 10/3/2016	Mathes Auto Sal	0.00		
Made telephone call to Otis Morris at McDaniels Acura (confirmed receipt of my email; will have matter cleared up by Tuesday; will either hear from him or Ron Stanley); prepared Request For Dealer License					

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Slip ID		Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
Information and Request For Vehicle Information; reviewed email from client and responded to same.						
56853	EXP	JGS	1	12.00	12.00	12.00
9/30/2016		Misc.				
Billed	G:8716	10/3/2016 Mathes Auto Sal				
\$12.00 paid to SCDMV Dealer Audit Unit Morris. Otis						
56854	EXP	JGS	1	6.00	6.00	6.00
9/30/2016		Misc.				
Billed	G:8716	10/3/2016 Mathes Auto Sal				
\$6.00 paid to SCDMV Titles Mail-In Unit Morris. Otis						
Total: 9/30/2016						
		Billable	2.90		844.50	844.50
		Unbillable	0.00		0.00	
		Total	2.90		844.50	
Transaction Date: 10/4/2016						
56864	TIME	JGS	0.10	285.00	28.50	28.50
10/4/2016		Phone fr client	0.00	C@1		
Billed	G:8752	11/2/2016 Mathes Auto Sal	0.00			
Received telephone call from Ron Stanley Morris. Otis						
(discussed status of case).						
Total: 10/4/2016						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	
Transaction Date: 10/6/2016						
56898	TIME	JGS	0.10	285.00	28.50	28.50
10/6/2016		Review Corres.	0.00	C@1		
Billed	G:8752	11/2/2016 Mathes Auto Sal	0.00			
Reviewed email from client and responded to Morris. Otis						
same.						
56902	TIME	JGS	0.10	285.00	28.50	0.00
10/6/2016		Review Corres.	0.10	C@1		
Billed	G:8752	11/2/2016 Mathes Auto Sal	0.00	No Charge		
Reviewed email from client concerning Morris' Morris. Otis						
ability to pay his lawyer and question about address for Dixon.						

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 10/6/2016					
	Billable	0.10		28.50	28.50
	Unbillable	0.10		28.50	
	Total	0.20		57.00	
Transaction Date: 10/13/2016					
56949 TIME	JGS	0.20	285.00	57.00	0.00
10/13/2016	Return call	0.20	C@1		
Billed G:8752 11/2/2016	Mathes Auto Sal	0.00	No Charge		
Returned telephone call to John Mathes (discussed status of case).					
	Morris. Otis	0.00			
Total: 10/13/2016					
	Billable	0.00		0.00	0.00
	Unbillable	0.20		57.00	
	Total	0.20		57.00	
Transaction Date: 10/14/2016					
56972 TIME	JGS	0.10	285.00	28.50	28.50
10/14/2016	Review Corres.	0.00	C@1		
Billed G:8752 11/2/2016	Mathes Auto Sal	0.00			
Reviewed email from client concerning NextGear's refusal to floor a vehicle.					
	Morris. Otis	0.00			
Total: 10/14/2016					
	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	
Transaction Date: 10/15/2016					
56980 TIME	JGS	0.10	285.00	28.50	28.50
10/15/2016	Review Corres.	0.00	C@1		
Billed G:8752 11/2/2016	Mathes Auto Sal	0.00			
Reviewed correspondence from SCDMV with copies of Application For A Dealer Or Wholesaler License.					
	Morris. Otis	0.00			

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 10/15/2016					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Transaction Date: 10/19/2016					
57027 TIME	JGS	1.50	285.00	427.50	427.50
10/19/2016	Review File	0.00	C@1		
Billed G:8752 11/2/2016	Mathes Auto Sal	0.00			
Reviewed file; made telephone call to client concerning status of matter; reviewed documents provided by SCDMV; prepared correspondence to AutoOwners to assert claim against Dixon's bond.		Morris. Otis	0.00		
Total: 10/19/2016					
	Billable	1.50		427.50	427.50
	Unbillable	0.00		0.00	
	Total	1.50		427.50	
Transaction Date: 10/24/2016					
57040 TIME	JGS	0.20	285.00	57.00	57.00
10/24/2016	Phone fr client	0.00	C@1		
Billed G:8752 11/2/2016	Mathes Auto Sal	0.00			
Received telephone call from Kristi Rae at Gill Ins. in Rock Hill (discussed claim against Dixon's bond).		Morris. Otis	0.00		
Total: 10/24/2016					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 10/25/2016					
57050 TIME	JGS	0.10	285.00	28.50	28.50
10/25/2016	Review Corres.	0.00	C@1		
Billed G:8752 11/2/2016	Mathes Auto Sal	0.00			
Reviewed email from John Mathes concerning NextGear's attempt to draft his account for curtailment and replied to same.		Morris. Otis	0.00		
Total: 10/25/2016					
57056 TIME	JGS	0.90	285.00	256.50	256.50
10/25/2016	Review document	0.00	C@1		
Billed G:8752 11/2/2016	Mathes Auto Sal	0.00			
Reviewed fax cover sheet and title documents		Morris. Otis	0.00		

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
from Gill Insurance; reviewed file to compare with client's sales records.					
57057	JGS	0.10	285.00	28.50	28.50
10/25/2016	Phone fr client	0.00	C@1		
Billed	G:8752 11/2/2016 Mathes Auto Sal	0.00			
Received telephone call from John Mathes (discussed status of matter; agreed to give SCDMV an opportunity to investigate Complaint filed by client earlier today).					
Total: 10/25/2016					
	Billable	1.10		313.50	313.50
	Unbillable	0.00		0.00	
	Total	1.10		313.50	
Transaction Date: 10/27/2016					
57074	JGS	0.10	285.00	28.50	28.50
10/27/2016	Review Corres.	0.00	C@1		
Billed	G:8752 11/2/2016 Mathes Auto Sal	0.00			
Reviewed email from client.					
Total: 10/27/2016					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Transaction Date: 10/31/2016					
57093	JGS	0.70	285.00	199.50	199.50
10/31/2016	Review Corres.	0.00	C@1		
Billed	G:8752 11/2/2016 Mathes Auto Sal	0.00			
Reviewed email from client; made telephone call to client concerning interest in verifying date that Tarica Worthy took possession; reviewed file; prepared email to Breon Walker, Esq. to confirm date Tarica Worthy acquired possession of vehicle.					
57098					
10/31/2016	JGS	1.30	285.00	370.50	370.50
Billed	Return call	0.00	C@1		
	G:8752 11/2/2016 Mathes Auto Sal	0.00			
Returned telephone call to John Mathes (discussed his conversation with NextGear representative concerning default, payment plan, and "uninsurable" list and his follow up call to auction concerning "uninsurable" list;					

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
confirmed that he could survive without NextGear); reviewed file; made telephone call to NextGear (not available; left message on voice mail); prepared email to client to suggest that we persuade Credit Union to bring dj action.					
Total: 10/31/2016					
	Billable	2.00		570.00	570.00
	Unbillable	0.00		0.00	
	Total	2.00		570.00	
Transaction Date: 11/1/2016					
57103	TIME	JGS	0.20	285.00	57.00
11/1/2016		Review Corres.	0.00	C@1	
Billed	G:8786	12/1/2016	Mathes Auto Sal	0.00	
Reviewed email from client and responded to same regarding encouraging Credit Union to bring declaratory judgment action against NextGear.		Morris. Otis	0.00		
57106	TIME	JGS	0.10	285.00	28.50
11/1/2016		Prepared letter	0.00	C@1	
Billed	G:8786	12/1/2016	Mathes Auto Sal	0.00	
Prepared email to John Mathes concerning suggestion to file suit, obtain civil action number, secure documents from all interested parties with subpoenas, depose Otis Morris, and turn over findings to Solicitor's Office.		Morris. Otis	0.00		
57107	TIME	JGS	0.10	285.00	28.50
11/1/2016		Phone fr client	0.00	C@1	
Billed	G:8786	12/1/2016	Mathes Auto Sal	0.00	
Received telephone call from client (authorized me to review NextGear agreement and contact Sr. V.P. at Credit Union).		Morris. Otis	0.00		
57111	TIME	JGS	1.40	285.00	399.00
11/1/2016		Review Corres.	0.00	C@1	
Billed	G:8786	12/1/2016	Mathes Auto Sal	0.00	
Reviewed email from client (authorized me to review NextGear contract); reviewed other emails from client; began review of NextGear agreement.		Morris. Otis	0.00		
57114	TIME	JGS	0.90	285.00	256.50
11/1/2016		Phone to client	0.00	C@1	
Billed	G:8786	12/1/2016	Mathes Auto Sal	0.00	

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Made telephone call to Daniel Harms at S.C. State Credit Union (not available; left message on voice mail); received telephone call from Daniel Harms (discussed his position that he hasn't been harmed other than by loss of collateral since he has a note from Ms. Worthy for sums advanced); made telephone call to Breon Walker (discussed benefit of S.C. Code Ann. S36-2-403 for Ms. Worthy).	Morris. Otis	0.00			
Total: 11/1/2016	Billable	2.70		769.50	769.50
	Unbillable	0.00		0.00	
	Total	2.70		769.50	
Transaction Date: 11/2/2016					
57129	JGS	0.10	285.00	28.50	28.50
11/2/2016	Review Corres.	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
Reviewed email from client regarding call from NextGear and responded to same.	Morris. Otis	0.00			
57118	JGS	0.30	285.00	85.50	85.50
11/2/2016	Review Corres.	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
Reviewed email from client and replied regarding suggestion to persuade Worthy to pursue certificate of title under entrustment statute in an effort to avoid choice of forum in NextGear contract.	Morris. Otis	0.00			
Total: 11/2/2016	Billable	0.40		114.00	114.00
	Unbillable	0.00		0.00	
	Total	0.40		114.00	
Transaction Date: 11/3/2016					
57137	JGS	0.10	285.00	28.50	28.50
11/3/2016	Review Corres.	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
Reviewed email from client (identified Mickey at NextGear and provided phone number); prepared email to client to request clarification on Dixon's account with NextGear.	Morris. Otis	0.00			

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Total: 11/3/2016	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Transaction Date: 11/4/2016					
57160	JGS	0.10	285.00	28.50	28.50
11/4/2016	Meeting	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:8786 12/1/2016 Met with Heyward Bannister at 924 Hampton Street; confirmed that Pro Bowl Motors, Inc. previously operated from that location.					
	Morris. Otis	0.00			
57161	JGS	0.40	285.00	114.00	114.00
11/4/2016	Review document	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:8786 12/1/2016 Resumed reviewing NextGear agreement; prepared email to client concerning status of case.					
	Morris. Otis	0.00			
Total: 11/4/2016	Billable	0.50		142.50	142.50
	Unbillable	0.00		0.00	
	Total	0.50		142.50	
Transaction Date: 11/10/2016					
57208	JGS	4.20	285.00	1197.00	1197.00
11/10/2016	Review document	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:8786 12/1/2016 Resumed review of NextGear agreement; reviewed Uniform Declaratory Judgments Act; began drafting pleadings.					
	Morris. Otis	0.00			
Total: 11/10/2016	Billable	4.20		1197.00	1197.00
	Unbillable	0.00		0.00	
	Total	4.20		1197.00	
Transaction Date: 11/11/2016					
57214	JGS	1.80	285.00	513.00	513.00
11/11/2016	Return call	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:8786 12/1/2016 Returned telephone call to John Mathes to discuss; reviewed and revised pleadings; began drafting subpoenas.					
	Morris. Otis	0.00			

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								Est.	Time	Bill	Status				
								Variance							
57215	TIME			JGS				0.30		285.00		85.50	85.50		
	11/11/2016				Review/Execute			0.00		C@1					
	Billed	G:8786	12/1/2016	Mathes Auto Sal				0.00							
				Morris. Otis				0.00							
			Reviewed and executed pleadings; issued check for filing fee; made telephone call to Mickey at NextGear (not available; left message on voice mail).												
57216	EXP			JGS				1		150.00		150.00	150.00		
	11/11/2016				Filing Fee										
	Billed	G:8786	12/1/2016	Mathes Auto Sal											
			\$150.00 paid to Clerk of Court.												
				Morris. Otis											
Total: 11/11/2016															
				Billable				2.10				748.50	748.50		
				Unbillable				0.00				0.00			
				Total				2.10				748.50			
Transaction Date: 11/14/2016															
57221	TIME			RGS				0.40		150.00		60.00	60.00		
	11/14/2016				Hand-deliver			0.00		C					
	Billed	G:8786	12/1/2016	Mathes Auto Sal				0.00							
			Filed Summons and Complaint at Richland County Clerk's Office.												
				Morris. Otis				0.00							
57224	TIME			JGS				0.50		285.00		142.50	142.50		
	11/14/2016				Phone to client			0.00		C@1					
	Billed	G:8786	12/1/2016	Mathes Auto Sal				0.00							
			Made telephone call to client (discussed NextGear payoff to secure certificates of title and assurances provided by NextGear representative); made telephone call to associate to request filing of pleadings; made telephone call to assistant to request preparation of Acceptance of Service; received telephone call from client (discussed sensitive nature of matter and decision to pause until certificates of title received).												
				Morris. Otis				0.00							
57226	TIME			JGS				0.10		285.00		28.50	28.50		
	11/14/2016				Review Corres.			0.00		C@1					
	Billed	G:8786	12/1/2016	Mathes Auto Sal				0.00							
			Reviewed email from client and responded to same.												
				Morris. Otis				0.00							

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Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
57229	TIME	JGS	0.10	285.00	28.50	28.50
11/14/2016		Prepare documen	0.00	C@1		
Billed	G:8786	Mathes Auto Sal	0.00			
12/1/2016		Morris. Otis	0.00			
Prepared Request For Dealer License Information; issued check for fees.						
57230	EXP	JGS	1	12.00	12.00	12.00
11/14/2016		Misc.				
Billed	G:8786	Mathes Auto Sal				
12/1/2016		Morris. Otis				
\$12.00 paid to SCDMV.						
57232	TIME	JGS	0.10	285.00	28.50	28.50
11/14/2016		Review Corres.	0.00	C@1		
Billed	G:8786	Mathes Auto Sal	0.00			
12/1/2016		Morris. Otis	0.00			
Reviewed email from client concerning status of Morris. Otis payoff and titles.						
Total: 11/14/2016						
		Billable	1.20		300.00	300.00
		Unbillable	0.00		0.00	
		Total	1.20		300.00	
Transaction Date: 11/15/2016						
57242	EXP	JGS	1	30.00	30.00	30.00
11/15/2016		Misc.				
Billed	G:8786	Mathes Auto Sal				
12/1/2016		Morris. Otis				
\$30.00 paid to RCSD for service of subpoenas upon Otis Morris and Pro Bowl Motors, Inc.						
57241	TIME	JGS	2.00	285.00	570.00	570.00
11/15/2016		Review File	0.00	C@1		
Billed	G:8786	Mathes Auto Sal	0.00			
12/1/2016		Morris. Otis	0.00			
Reviewed file; prepared Acceptance of Service for NextGear; reviewed subpoena prepared by assistant; traveled to and from Corporation Service Company and Richland County Sheriffs Department; met with Henry Dukes concerning service of papers; made telephone call to Daniel Harms concerning status of matter; prepared emails to Daniel Harms, Breon Walker, and Kristi Dennis with courtesy copies of suit papers; prepared email to client concerning status of case.						
Total: 11/15/2016						
		Billable	2.00		600.00	600.00

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	2.00		600.00	

Transaction Date: 11/16/2016

57245	TIME	JGS	0.10	285.00	28.50	28.50
11/16/2016		Review Corres.	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed emails from client concerning status of case.		Morris. Otis	0.00			

57253	TIME	JGS	0.50	285.00	142.50	0.00
11/16/2016		Review File	0.50	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00	No Charge		
Reviewed and organized file.		Morris. Otis	0.00			

57244	TIME	JGS	0.40	285.00	114.00	114.00
11/16/2016		Review/Execute	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed and executed correspondence to NextGear; prepared correspondence to Michael Moore to serve subpoena upon Dixon's Automotive, LLC.		Morris. Otis	0.00			

Total: 11/16/2016

Billable	0.50	142.50	142.50
Unbillable	0.50	142.50	
Total	1.00	285.00	

Transaction Date: 11/17/2016

57258	TIME	JGS	0.30	285.00	85.50	85.50
11/17/2016		Review document	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed invoices provided by Philips Auto Tech in response to subpoenas; reviewed email from client and responded to same.		Morris. Otis	0.00			

Total: 11/17/2016

Billable	0.30	85.50	85.50
Unbillable	0.00	0.00	
Total	0.30	85.50	

Transaction Date: 11/18/2016

57280	EXP	JGS	1	185.00	185.00	185.00
11/18/2016		Service Fee				
Billed	G:8786	12/1/2016 Mathes Auto Sal				
\$185.00 paid to Dukes Investigations for service		Morris. Otis				

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
of subpoenas.					
57281	TIME	JGS	0.40	285.00	114.00
11/18/2016		Review document	0.00	C@1	114.00
Billed	G:8786 12/1/2016	Mathes Auto Sal	0.00		
Reviewed affidavits of service upon NextGear, Morris. Otis					
Philips, Tarica Worthy, and State Credit Union					
from Henry Dukes; prepared email to client					
concerning status of case; prepared					
correspondence to Clerk of Court with Affidavit					
of Service upon NextGear for filing.					
57282	TIME	JGS	0.20	285.00	57.00
11/18/2016		Phone fr client	0.00	C@1	57.00
Billed	G:8786 12/1/2016	Mathes Auto Sal	0.00		
Received telephone call from Daniel Harms at Morris. Otis					
State Credit Union (advised that documents					
have been pulled and sent by certified mail).					
57283	TIME	JGS	0.20	285.00	57.00
11/18/2016		Prepared letter	0.00	C@1	57.00
Billed	G:8786 12/1/2016	Mathes Auto Sal	0.00		
Prepared text message to Morris. Otis					
concerning possible interest in matter; prepared					
email to client concerning status of case.					
Total: 11/18/2016					
	Billable	0.80		413.00	413.00
	Unbillable	0.00		0.00	
	Total	0.80		413.00	
Transaction Date: 11/21/2016					
57285	TIME	JGS	0.10	285.00	28.50
11/21/2016		Phone fr client	0.00	C@1	28.50
Billed	G:8786 12/1/2016	Mathes Auto Sal	0.00		
Received telephone call from client concerning Morris. Otis					
status of case and to confirm vacation dates.					
57286	TIME	JGS	0.10	285.00	28.50
11/21/2016		Review Corres.	0.00	C@1	28.50
Billed	G:8786 12/1/2016	Mathes Auto Sal	0.00		
Reviewed correspondence from Darla P. Jirel at Morris. Otis					
State Credit Union with copies of documents.					
57291	TIME	JGS	0.30	285.00	85.50
11/21/2016		Return call	0.00	C@1	85.50
Billed	G:8786 12/1/2016	Mathes Auto Sal	0.00		

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Returned telephone call to (discussed documents provided; suggested that I contact)	Morris. Otis	0.00			

Total: 11/21/2016

Billable	0.50	142.50	142.50
Unbillable	0.00	0.00	
Total	0.50	142.50	

Transaction Date: 11/22/2016

57310	TIME	JGS	0.30	285.00	85.50	85.50
11/22/2016		Phone fr client	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Received telephone call from Robert Goings (discussed status of case).	Morris. Otis	0.00				

57312	TIME	JGS	0.50	285.00	142.50	142.50
11/22/2016		Review Corres.	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed email from Robert Goings with attachments and request for extension of time; reviewed file and responded to same and furnished copies of correspondence, subpoenas, and responsive documents.	Morris. Otis	0.00				

57314	TIME	JGS	0.10	285.00	28.50	28.50
11/22/2016		Review Corres.	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed emails from client concerning Robert Goings' involvement and responded to same.	Morris. Otis	0.00				

Total: 11/22/2016

Billable	0.90	256.50	256.50
Unbillable	0.00	0.00	
Total	0.90	256.50	

Transaction Date: 11/23/2016

57337	TIME	JGS	0.30	285.00	85.50	85.50
11/23/2016		Review Corres.	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed correspondence from Monica Brown of SCDMV with enclosures.	Morris. Otis	0.00				

Total: 11/23/2016

Billable	0.30	85.50	85.50
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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	0.30		85.50	

Transaction Date: 11/29/2016

57365	TIME	JGS	0.10	285.00	28.50	28.50
11/29/2016		Review File	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed file; made telephone call to Deputy Morris. Otis			0.00			
Coleman concerning status of service of subpoenas upon Otis Morris (not available; left message on voice mail).						
57357	TIME	JGS	0.10	285.00	28.50	28.50
11/29/2016		Review Corres.	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Reviewed email from client concerning auction decision to cease allowing him to participate.		Morris. Otis	0.00			

Total: 11/29/2016

Billable	0.20	57.00	57.00
Unbillable	0.00	0.00	
Total	0.20	57.00	

Transaction Date: 11/30/2016

57383	TIME	JGS	0.10	285.00	28.50	28.50
11/30/2016		Return call	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Returned telephone call to Michael Moore (advised that he bought vehicle at auction in Florida, floored with NextGear, and sold at auction in Darlington but denied that Otis Morris bought it for him).		Morris. Otis	0.00			
57382	TIME	JGS	0.10	285.00	28.50	28.50
11/30/2016		Prepared letter	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Prepared email to regarding guy with a on the		Morris. Otis	0.00			

57388	TIME	JGS	0.20	285.00	57.00	57.00
11/30/2016		Phone fr client	0.00	C@1		
Billed	G:8786	12/1/2016 Mathes Auto Sal	0.00			
Received telephone call from Ron Stanley concerning status of matter and potential resolution; prepared email to client concerning same.		Morris. Otis	0.00			

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Total: 11/30/2016					
	Billable	0.40		114.00	114.00
	Unbillable	0.00		0.00	
	Total	0.40		114.00	
Transaction Date: 12/1/2016					
57402 TIME	JGS	0.10	285.00	28.50	28.50
12/1/2016	Phone fr client	0.00	C@1		
Billed G:8824 1/3/2017	Mathes Auto Sal	0.00			
Received telephone call from Breon Walker (requested copy of subpoena served upon Tarica Worthy).		Morris. Otis	0.00		
57396 TIME	JGS	0.30	285.00	85.50	85.50
12/1/2016	Review document	0.00	C@1		
Billed G:8824 1/3/2017	Mathes Auto Sal	0.00			
Reviewed Affidavit of Service of subpoenas upon Otis Morris and ProBowl from RCSD; returned telephone call to John Mathes (discussed request for 10 day payoff from NextGear).		Morris. Otis	0.00		
Total: 12/1/2016					
	Billable	0.40		114.00	114.00
	Unbillable	0.00		0.00	
	Total	0.40		114.00	
Transaction Date: 12/2/2016					
57404 TIME	JGS	1.30	285.00	370.50	370.50
12/2/2016	Review File	0.00	C@1		
Billed G:8824 1/3/2017	Mathes Auto Sal	0.00			
Reviewed file; prepared email to Ron Stanley concerning subpoenas served upon Otis Morris.		Morris. Otis	0.00		
Total: 12/2/2016					
	Billable	1.30		370.50	370.50
	Unbillable	0.00		0.00	
	Total	1.30		370.50	
Transaction Date: 12/4/2016					
57406 TIME	JGS	0.10	285.00	28.50	28.50
12/4/2016	Phone to client	0.00	C@1		
Billed G:8824 1/3/2017	Mathes Auto Sal	0.00			
Made telephone call to Michael Moore (not available; left message on voice mail); received telephone call from Michael Moore (advised that		Morris. Otis	0.00		

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
he was forwarding documents as we spoke).					
Total: 12/4/2016					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Transaction Date: 12/6/2016					
57428 TIME	JGS	0.70	285.00	199.50	199.50
12/6/2016	Prepared letter	0.00	C@1		
Billed G:8824 1/3/2017	Mathes Auto Sal	0.00			
Prepared correspondence and subpoena to	Morris. Otis	0.00			
Reeves Import Motorcars, Inc. and Texas Direct					
Auto; made telephone call to Michael Moore to					
follow up on request for auction slip.					
57432 TIME					
12/6/2016	Review/Execute	0.00	C@1	28.50	28.50
Billed G:8824 1/3/2017	Mathes Auto Sal	0.00			
Reviewed and executed correspondence and	Morris. Otis	0.00			
subpoenas.					
Total: 12/6/2016					
	Billable	0.80		228.00	228.00
	Unbillable	0.00		0.00	
	Total	0.80		228.00	
Transaction Date: 12/7/2016					
57440 EXP	JGS	1	12.94	12.94	12.94
12/7/2016	Service Fee				
Billed G:8824 1/3/2017	Mathes Auto Sal				
\$12.94 paid to Postmaster for service of	Morris. Otis				
subpoenas upon Reeves and Texas Direct by					
certified mail.					
57447 TIME					
12/7/2016	Review Corres.	0.00	C@1	85.50	85.50
Billed G:8824 1/3/2017	Mathes Auto Sal	0.00			
Reviewed email from Breon Walker.	Morris. Otis	0.00			
Total: 12/7/2016					
	Billable	0.30		98.44	98.44
	Unbillable	0.00		0.00	
	Total	0.30		98.44	

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Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
<u>Transaction Date: 12/8/2016</u>						
57455	TIME	JGS	0.10	285.00	28.50	28.50
12/8/2016		Review Corres.	0.00	C@1		
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00			
Reviewed email from Michael Moore with copy of Soft Copy Work Order from Manheim Tampa.						
<u>Total: 12/8/2016</u>						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	
<u>Transaction Date: 12/9/2016</u>						
57467	TIME	JGS	0.10	285.00	28.50	28.50
12/9/2016		Prepared letter	0.00	C@1		
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00			
Prepared email to Ron Stanley concerning status of documents subpoenaed from Otis Morris.						
<u>Total: 12/9/2016</u>						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	
<u>Transaction Date: 12/13/2016</u>						
57509	TIME	JGS	0.10	285.00	28.50	28.50
12/13/2016		Phone fr client	0.00	C@1		
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00			
Received telephone call from Robert Goings (advised that he would respond to subpoena to Manheim by Friday); prepared email to client concerning same.						
57505	EXP	JGS	1	25.00	25.00	25.00
12/13/2016		Filing Fee				
Billed	G:8824	1/3/2017 Mathes Auto Sal				
\$25.00 paid to Clerk of Court.						
57504	TIME	JGS	2.60	285.00	741.00	741.00
12/13/2016		Review File	0.00	C@1		
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00			
Reviewed file; prepared email to client concerning recommendations to seek contempt sanctions against Otis Morris with the goal to secure documents, expose fraud by Morris, and						

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
demonstrate sale in ordinary course by Pro Bowl, terminating any claim by NextGear against client; prepared correspondence to Ron Stanley for service of same; hand-delivered motion for filing and service; issued check for filing fee; prepared correspondence to Judge Benjamin to request hearing.					
Total: 12/13/2016					
	Billable	2.70		794.50	794.50
	Unbillable	0.00		0.00	
	Total	2.70		794.50	
Transaction Date: 12/15/2016					
57528	TIME	JGS	0.30	285.00	85.50
12/15/2016		Review Corres.	0.00	C@1	
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00		
Reviewed email from Robert Goings and responded to same.		Morris. Otis	0.00		
57529	TIME	JGS	0.30	285.00	85.50
12/15/2016		Review Corres.	0.00	C@1	
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00		
Reviewed email from client and responded to same; reviewed American Lease Plans case and forwarded copy of same to client.		Morris. Otis	0.00		
57527	TIME	JGS	0.30	285.00	85.50
12/15/2016		Review Corres.	0.00	C@1	
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00		
Reviewed correspondence from Ron Stanley with copies of buyers order and Buyer's Guide; prepared email to Ron Stanley concerning scheduling Otis Morris' deposition.		Morris. Otis	0.00		
Total: 12/15/2016					
	Billable	0.90		256.50	256.50
	Unbillable	0.00		0.00	
	Total	0.90		256.50	
Transaction Date: 12/16/2016					
57541	TIME	JGS	0.20	285.00	57.00
12/16/2016		Prepare documen	0.00	C@1	
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00		
Prepared Notice of Deposition and correspondence to Ron Stanley.		Morris. Otis	0.00		

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57542	TIME			JGS	0.30	285.00	85.50	85.50
	12/16/2016			Review Corres.	0.00	C@1		
Billed	G:8824	1/3/2017	Mathes Auto Sal		0.00			
Reviewed correspondence from Robert Goings with documents from Manheim; prepared email to client concerning same.				Morris. Otis	0.00			
57545	TIME			JGS	0.10	285.00	28.50	28.50
	12/16/2016			Review/Execute	0.00	C@1		
Billed	G:8824	1/3/2017	Mathes Auto Sal		0.00			
Reviewed and executed correspondence and notice of deposition.				Morris. Otis	0.00			
57551	TIME			JGS	0.20	285.00	57.00	57.00
	12/16/2016			Phone fr client	0.00	C@1		
Billed	G:8824	1/3/2017	Mathes Auto Sal		0.00			
Received telephone call from client concerning status of case.				Morris. Otis	0.00			
Total: 12/16/2016								
				Billable	0.80		228.00	228.00
				Unbillable	0.00		0.00	
				Total	0.80		228.00	
Transaction Date: 12/20/2016								
57579	TIME			JGS	0.10	285.00	28.50	28.50
	12/20/2016			Review Corres.	0.00	C@1		
Billed	G:8824	1/3/2017	Mathes Auto Sal		0.00			
Reviewed copy of correspondence from Ms. Dionne Woods at SCDMV to client regarding completion of investigation of Dixon's Automotive, LLC.				Morris. Otis	0.00			
Total: 12/20/2016								
				Billable	0.10		28.50	28.50
				Unbillable	0.00		0.00	
				Total	0.10		28.50	
Transaction Date: 12/21/2016								
57586	TIME			JGS	0.90	285.00	256.50	256.50
	12/21/2016			Review File	0.00	C@1		
Billed	G:8824	1/3/2017	Mathes Auto Sal		0.00			
Reviewed file; prepared deposition subpoena for Otis Morris; prepared email to client concerning status of matter.				Morris. Otis	0.00			

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
57588	TIME	JGS	0.20	285.00	57.00	57.00
12/21/2016		Review/Execute	0.00	C@1		
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00			
Reviewed and executed subpoena; issued check for witness fee and mileage; reviewed email from client and responded to same.			0.00			
57589	EXP	JGS	1	35.00	35.00	35.00
12/21/2016		Misc.				
Billed	G:8824	1/3/2017 Mathes Auto Sal				
\$35.00 paid to Otis Morris.						
Total: 12/21/2016						
		Billable	1.10		348.50	348.50
		Unbillable	0.00		0.00	
		Total	1.10		348.50	
Transaction Date: 12/28/2016						
57631	TIME	JGS	0.10	285.00	28.50	28.50
12/28/2016		Review document	0.00	C@1		
Billed	G:8824	1/3/2017 Mathes Auto Sal	0.00			
Reviewed documents produced by Reeves Import Motorcross, Inc. in response to subpoena.			0.00			
Total: 12/28/2016						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	
Transaction Date: 12/30/2016						
57647	EXP	JGS	1	55.00	55.00	55.00
12/30/2016		Service Fee				
Billed	G:8824	1/3/2017 Mathes Auto Sal				
\$55 paid to Dukes Investigations for service of subpoena upon Otis Morris.						
Total: 12/30/2016						
		Billable	0.00		55.00	55.00
		Unbillable	0.00		0.00	
		Total	0.00		55.00	
Transaction Date: 1/4/2017						
57681	TIME	JGS	0.50	285.00	142.50	142.50
1/4/2017		Review Corres.	0.00	C@1		

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Activity	Client	Reference	Units	DNB Time	Rate	Rate Info	Slip Value	Billed SV
								Est. Time		Bill Status			Adjustment
								Variance					Markup
Billed	G:8861	2/1/2017	Mathes Auto Sal					0.00					
			Reviewed email from client; reviewed file and responded to same; reviewed file; prepared email to Ron Stanley.					0.00					
Total: 1/4/2017													
			Billable					0.50				142.50	142.50
			Unbillable					0.00				0.00	
			Total					0.50				142.50	
Transaction Date: 1/9/2017													
57726	TIME		JGS					0.20		285.00		57.00	57.00
1/9/2017			Return call					0.00		C@1			
Billed	G:8861	2/1/2017	Mathes Auto Sal					0.00					
			Returned telephone call to John Mathis (discussed status of case).					0.00					
57720	TIME		JGS					0.20		285.00		57.00	57.00
1/9/2017			Review File					0.00		C@1			
Billed	G:8861	2/1/2017	Mathes Auto Sal					0.00					
			Reviewed file; returned telephone call to Joe Patsko (not available; left message on voice mail).					0.00					
Total: 1/9/2017													
			Billable					0.40				114.00	114.00
			Unbillable					0.00				0.00	
			Total					0.40				114.00	
Transaction Date: 1/11/2017													
57748	TIME		JGS					1.00		285.00		285.00	285.00
1/11/2017			Review Corres.					0.00		C@1			
Billed	G:8861	2/1/2017	Mathes Auto Sal					0.00					
			Reviewed email from Ron Stanley with claim that Otis Morris can't appear for deposition because he's starting a new job tomorrow; made telephone call to McDaniels Acura to confirm that Otis was still employed; made telephone call to Linda Mosley, Personnel Manager at McDaniels Acura (not available; left message on voice mail); made telephone call to Linda Moslet (requested her assistance to confirm that Otis was still at McDaniels); prepared email to client to request that he call Otis at McDaniels; reviewed email from client regarding same; prepared email to Ron Stanley					0.00					

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Slip ID		Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
concerning same; reviewed email from client concerning status of matter.						
57749	TIME	JGS	2.00	285.00	570.00	570.00
1/11/2017		Review File	0.00	C@1		
Billed	G:8861	2/1/2017 Mathes Auto Sal	0.00			
Reviewed file; prepared for deposition of Otis Morris; reviewed email from client concerning dilemma with limited number of vacation days to burn for a deposition which may not happen; prepared email to Robert Goings and Breon Walker concerning status of matter.			0.00			
57746	TIME	JGS	0.20	285.00	57.00	57.00
1/11/2017		Review Corres.	0.00	C@1		
Billed	G:8861	2/1/2017 Mathes Auto Sal	0.00			
Reviewed email from Ron Stanley concerning request to reschedule; reviewed file; replied to Ron Stanley's email.			0.00			
Total: 1/11/2017						
		Billable	3.20		912.00	912.00
		Unbillable	0.00		0.00	
		Total	3.20		912.00	
Transaction Date: 1/12/2017						
57754	TIME	JGS	4.10	285.00	1168.50	1168.50
1/12/2017		Review File	0.00	C@1		
Billed	G:8861	2/1/2017 Mathes Auto Sal	0.00			
Resumed review of file and preparation for Otis Morris' deposition; met with client and his parents; prepared email to Ron Stanley concerning rescheduling; made telephone call to Robert Goings (not available; left message on voice mail); prepared proposed consent order; hand-delivered same for consent by opposing counsel.			0.00			
Total: 1/12/2017						
		Billable	4.10		1168.50	1168.50
		Unbillable	0.00		0.00	
		Total	4.10		1168.50	
Transaction Date: 1/13/2017						
57767	TIME	RGS	1.70	150.00	255.00	255.00
1/13/2017		Draft	0.00	C		

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
	Billed	G:8861	2/1/2017	Mathes Auto Sal	0.00			
			Responded to Motion to Dismiss by drafting	Morris. Otis	0.00			
			Memorandum in Opposition.					
57775	TIME			JGS	0.10	285.00	28.50	28.50
	1/13/2017			Review Corres.	0.00	C@1		
	Billed	G:8861	2/1/2017	Mathes Auto Sal	0.00			
			Reviewed text messages between client and	Morris. Otis	0.00			
			Otis Morris.					
Total: 1/13/2017								
				Billable	1.80		283.50	283.50
				Unbillable	0.00		0.00	
				Total	1.80		283.50	
Transaction Date: 1/16/2017								
57778	TIME			RGS	3.10	150.00	465.00	465.00
	1/16/2017			Review/Revise	0.00	C		
	Billed	G:8861	2/1/2017	Mathes Auto Sal	0.00			
			Resumed Response to Motion to Dismiss by	Morris. Otis	0.00			
			drafting Memorandum in Opposition.					
57788	EXP			JGS	1	108.90	108.90	108.90
	1/16/2017			Misc.				
	Billed	G:8861	2/1/2017	Mathes Auto Sal				
			\$108.90 paid to Southern Reporting, Inc. for	Morris. Otis				
			appearance fee on 1/12/17.					
Total: 1/16/2017								
				Billable	3.10		573.90	573.90
				Unbillable	0.00		0.00	
				Total	3.10		573.90	
Transaction Date: 1/17/2017								
57791	TIME			RGS	4.30	150.00	645.00	645.00
	1/17/2017			Review/Revise	0.00	C		
	Billed	G:8861	2/1/2017	Mathes Auto Sal	0.00			
			Resumed Response to Motion to Dismiss by	Morris. Otis	0.00			
			drafting Memorandum in Opposition.					
57795	TIME			JGS	1.30	285.00	370.50	370.50
	1/17/2017			Review File	0.00	C@1		
	Billed	G:8861	2/1/2017	Mathes Auto Sal	0.00			
			Reviewed file; resumed preparation for	Morris. Otis	0.00			
			deposition.					

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57797	TIME			JGS		2.60	285.00	741.00	741.00
	1/17/2017			Conference		0.00	C@1		
	Billed	G:8861	2/1/2017	Mathes Auto Sal		0.00			
			Office conference with client and spouse; conducted deposition of Otis Morris; office conference with Breon Walker (encouraged her to pursue Dixon, Dixon's bonding company, and NextGear).	Morris. Otis		0.00			
Total: 1/17/2017									
				Billable		8.20		1756.50	1756.50
				Unbillable		0.00		0.00	
				Total		8.20		1756.50	
Transaction Date: 1/20/2017									
57809	TIME			RGS		2.00	150.00	300.00	300.00
	1/20/2017			Draft		0.00	C		
	Billed	G:8861	2/1/2017	Mathes Auto Sal		0.00			
			Resumed drafting Memorandum in Opposition.	Morris. Otis		0.00			
57810	TIME			RGS		3.00	150.00	450.00	450.00
	1/20/2017			Research		0.00	C		
	Billed	G:8861	2/1/2017	Mathes Auto Sal		0.00			
			Researched additional law on forum selection clauses and unconscionability; completed drafting Memorandum in Opposition.	Morris. Otis		0.00			
Total: 1/20/2017									
				Billable		5.00		750.00	750.00
				Unbillable		0.00		0.00	
				Total		5.00		750.00	
Transaction Date: 1/22/2017									
57816	TIME			JGS		0.50	285.00	142.50	142.50
	1/22/2017			Review document		0.00	C@1		
	Billed	G:8861	2/1/2017	Mathes Auto Sal		0.00			
			Reviewed draft of Memorandum In Opposition To	Morris. Otis		0.00			
			Defendant's Motion To Dismiss, Or In The Alternative, For Summary Judgment prepared by associate.						
Total: 1/22/2017									
				Billable		0.50		142.50	142.50

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				Unbillable	0.00		0.00	
				Total	0.50		142.50	
<u>Transaction Date: 1/23/2017</u>								
57819	TIME			RGS	1.20	150.00	180.00	180.00
1/23/2017				Conference	0.00	C		
Billed	G:8861	2/1/2017		Mathes Auto Sal	0.00			
Consulted client; drafted Affidavit to offer support for allegations made regarding Nextgear's contacts in S.C. in Memorandum in Opposition.				Morris. Otis	0.00			
57824	TIME			JGS	0.20	285.00	57.00	57.00
1/23/2017				Phone fr client	0.00	C@1		
Billed	G:8861	2/1/2017		Mathes Auto Sal	0.00			
Received telephone call from client concerning status of case (identified Inv. Duckett with Columbia P.D. as point of contact).				Morris. Otis	0.00			
57818	TIME			RGS	0.50	150.00	75.00	75.00
1/23/2017				Review/Revise	0.00	C		
Billed	G:8861	2/1/2017		Mathes Auto Sal	0.00			
Made revisions to Memorandum in Opposition per JGS.				Morris. Otis	0.00			
Total: 1/23/2017								
				Billable	1.90		312.00	312.00
				Unbillable	0.00		0.00	
				Total	1.90		312.00	
<u>Transaction Date: 1/24/2017</u>								
57831	TIME			RGS	0.30	150.00	45.00	45.00
1/24/2017				Review/Revise	0.00	C		
Billed	G:8861	2/1/2017		Mathes Auto Sal	0.00			
Made revisions to Affidavit per JGS; emailed correspondence attaching proposed Memorandum and Affidavit to client.				Morris. Otis	0.00			
57833	TIME			RGS	0.40	150.00	60.00	60.00
1/24/2017				Conference	0.00	C		
Billed	G:8861	2/1/2017		Mathes Auto Sal	0.00			
Consulted with JGS about how to Amend Complaint in lieu of recent discovery and Morris' deposition.				Morris. Otis	0.00			
57834	TIME			RGS	1.20	150.00	180.00	180.00
1/24/2017				Draft	0.00	C		
Billed	G:8861	2/1/2017		Mathes Auto Sal	0.00			

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Began drafting Amended Complaint to include Otis Morris, Dixon's, and Worthy as parties.	Morris. Otis	0.00			
57835	RGS	3.70	150.00	555.00	555.00
1/24/2017	Draft	0.00	C		
Billed	G:8861 2/1/2017 Mathes Auto Sal	0.00			
Drafted Amended Complaint to include declaratory judgment action including Otis Morris, Dixon's, and Worthy.	Morris. Otis	0.00			
57837	JGS	0.60	285.00	171.00	171.00
1/24/2017	Review document	0.00	C@1		
Billed	G:8861 2/1/2017 Mathes Auto Sal	0.00			
Reviewed Affidavit drafted for client by associate Morris. Otis and 2nd draft of Memorandum In Opposition; reviewed and revised same.	Morris. Otis	0.00			
57841	JGS	0.50	285.00	142.50	142.50
1/24/2017	Conference	0.00	C@1		
Billed	G:8861 2/1/2017 Mathes Auto Sal	0.00			
Office conference with associate concerning drafting amended complaint.	Morris. Otis	0.00			
Total: 1/24/2017					
	Billable	6.70		1153.50	1153.50
	Unbillable	0.00		0.00	
	Total	6.70		1153.50	
Transaction Date: 1/25/2017					
57853	RGS	1.00	150.00	150.00	150.00
1/25/2017	Review document	0.00	C		
Billed	G:8861 2/1/2017 Mathes Auto Sal	0.00			
Reviewed Otis Morris' deposition transcript to supplement Amended Complaint with separate causes of action.	Morris. Otis	0.00			
57854	RGS	2.70	150.00	405.00	405.00
1/25/2017	Draft	0.00	C		
Billed	G:8861 2/1/2017 Mathes Auto Sal	0.00			
Drafted Amended Complaint to include claims against Morris under UTPA, Dealers Act, and for conversion, as well as claim against Manheim for negligence.	Morris. Otis	0.00			

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Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
57862	TIME	JGS	0.60	285.00	171.00	171.00
1/25/2017		Review document	0.00	C@1		
Billed	G:8861	2/1/2017 Mathes Auto Sal	0.00			
Reviewed deposition of Otis Morris.			0.00			
Total: 1/25/2017						
		Billable	4.30		726.00	726.00
		Unbillable	0.00		0.00	
		Total	4.30		726.00	
<u>Transaction Date: 1/26/2017</u>						
57873	TIME	JGS	0.20	285.00	57.00	57.00
1/26/2017		Prepared letter	0.00	C@1		
Billed	G:8861	2/1/2017 Mathes Auto Sal	0.00			
Prepared email to		with copy of	0.00			
deposition transcript; made telephone call to		Morris. Otis	0.00			
Breon Walker (not available; left message on voice mail).						
57874	TIME	JGS	1.00	285.00	285.00	285.00
1/26/2017		Phone to client	0.00	C@1		
Billed	G:8861	2/1/2017 Mathes Auto Sal	0.00			
Made telephone call to Investigator Duckett;		Morris. Otis	0.00			
traveled to and from CPD; met with Investigator						
Duckett; made telephone call to						
to secure permission to disclose matters between						
Otis Morris and						
prepared text message to client concerning						
status of matter; prepared email to Investigator						
Duckett with copies of Complaint and						
correspondence regarding						
Total: 1/26/2017						
		Billable	1.20		342.00	342.00
		Unbillable	0.00		0.00	
		Total	1.20		342.00	
<u>Transaction Date: 1/27/2017</u>						
57887	TIME	JGS	0.50	285.00	142.50	142.50
1/27/2017		Review document	0.00	C@1		
Billed	G:8861	2/1/2017 Mathes Auto Sal	0.00			
Reviewed draft of Amended Complaint prepared		Morris. Otis	0.00			
by associate.						

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Total: 1/27/2017	Billable	0.50		142.50	142.50
	Unbillable	0.00		0.00	
	Total	0.50		142.50	
Transaction Date: 1/31/2017					
57917	JGS	0.50	285.00	142.50	142.50
1/31/2017	Review document	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
Reviewed Amended Complaint drafted by Morris. Otis					
associate.					
57902	RGS	0.40	150.00	60.00	60.00
1/31/2017	Review/Revise	0.00	C		
Billed	Mathes Auto Sal	0.00			
Made final revisions to Complaint; revised Summons to add new parties; drafted letter to Clerk of Court to file.					
Total: 1/31/2017	Billable	0.90		202.50	202.50
	Unbillable	0.00		0.00	
	Total	0.90		202.50	
Transaction Date: 2/1/2017					
57920	RGS	0.70	150.00	105.00	105.00
2/1/2017	Review/Revise	0.00	C		
Billed	Mathes Auto Sal	0.00			
Made final revisions to Amended Complaint, Memorandum in Opposition to Defendant's Motion to Dismiss; prepared copies to file with Clerk of Court.					
57921	RGS	0.80	150.00	120.00	120.00
2/1/2017	Preparation	0.00	C		
Billed	Mathes Auto Sal	0.00			
Filed Amended Complaint, Memorandum in Opposition with Richland County Clerk of Court; sent copies to client; served copy of Memorandum in Opposition and Affidavit on counsel for Nextgear.					
57926	JGS	0.80	285.00	228.00	228.00
2/1/2017	Review/Execute	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
Reviewed and executed Amended Summons Morris. Otis					

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
and Amended Complaint; reviewed and executed Plaintiff's Memorandum In Opposition To Defendant's Motion To Dismiss, Or In The Alternative, For Summary Judgment.					
Total: 2/1/2017					
	Billable	2.30		453.00	453.00
	Unbillable	0.00		0.00	
	Total	2.30		453.00	
Transaction Date: 2/2/2017					
57937	TIME	RGS	1.20	150.00	180.00
2/2/2017		Legal Research	0.00	C	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Researched registered agents for added parties so that they may be served with copies of Amended Summons and Complaint; prepared copies of pleadings, and correspondence to serve registered agents.					
57938	TIME	JGS	0.20	285.00	57.00
2/2/2017		Review Corres.	0.00	C@1	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Reviewed email from Robert Goings and responded to same.					
57944	TIME	JGS	0.10	285.00	28.50
2/2/2017		Return call	0.10	C@1	0.00
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00	No Charge	
Returned telephone call to Breon Walker (not available; left message on voice mail).					
Total: 2/2/2017					
	Billable	1.40		237.00	237.00
	Unbillable	0.10		28.50	
	Total	1.50		265.50	
Transaction Date: 2/3/2017					
57945	TIME	RGS	1.00	150.00	150.00
2/3/2017		Hand-deliver	0.00	C	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Served all parties listed in the Amended Summons and Amended Complaint.					

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Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
57950	TIME	JGS	0.30	285.00	85.50	85.50
2/3/2017		Return call	0.00	C@1		
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00			
Returned telephone call to Breon Walker (not available; left message on voice mail); received telephone call from Breon Walker (discussed service of pleadings).						
		Morris. Otis	0.00			
57955	EXP	JGS	1	10.00	10.00	10.00
2/3/2017		Misc.				
Billed	G:8895	3/2/2017 Mathes Auto Sal				
\$10.00 paid to S.C. Dept. of Insurance for service - Auto Owner						
		Morris. Otis				
57956	EXP	JGS	1	10.00	10.00	10.00
2/3/2017		Misc.				
Billed	G:8895	3/2/2017 Mathes Auto Sal				
\$10.00 paid to S.C. Dept. of Insurance for service - Travelers						
		Morris. Otis				
Total: 2/3/2017						
		Billable	1.30		255.50	255.50
		Unbillable	0.00		0.00	
		Total	1.30		255.50	
Transaction Date: 2/6/2017						
57974	EXP	JGS	1	31.26	31.26	31.26
2/6/2017		Service Fee				
Billed	G:8895	3/2/2017 Mathes Auto Sal				
\$31.26 paid to Postmaster for service of process by mail.						
		Morris. Otis				
Total: 2/6/2017						
		Billable	0.00		31.26	31.26
		Unbillable	0.00		0.00	
		Total	0.00		31.26	
Transaction Date: 2/9/2017						
57996	TIME	RGS	0.40	150.00	60.00	60.00
2/9/2017		Review/Revise	0.00	C		
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00			
Amended Affidavits of Personal Service to prove that co-defendants were properly served.						
		Morris. Otis	0.00			

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
	Posting Status	Activity	DNB Time	Rate Info		Adjustment
	Description	Client	Est. Time	Bill Status		Markup
		Reference	Variance			
57999	TIME	JGS	0.20	285.00	57.00	57.00
2/9/2017		Review document	0.00	C@1		
Billed	G:8895	Mathes Auto Sal	0.00			
	3/2/2017	Morris. Otis	0.00			
Reviewed return receipts for S.C. Dept. of Ins. from Postmaster, delegated preparation of certificates of compliance to associate; reviewed correspondence from Director of S.C. Dept. of Ins.						
Total: 2/9/2017						
		Billable	0.60		117.00	117.00
		Unbillable	0.00		0.00	
		Total	0.60		117.00	
Transaction Date: 2/10/2017						
58023	EXP	JGS	1	55.00	55.00	55.00
2/10/2017		Service Fee				
Billed	G:8895	Mathes Auto Sal				
	3/2/2017	Morris. Otis				
\$55.00 paid to Dukes Inv. for service (Otis Morris).						
58020	TIME	JGS	0.20	285.00	57.00	57.00
2/10/2017		Return call	0.00	C@1		
Billed	G:8895	Mathes Auto Sal	0.00			
	3/2/2017	Morris. Otis	0.00			
Returned telephone call to Daniel Harms (discussed status of case).						
58024	EXP	JGS	1	55.00	55.00	55.00
2/10/2017		Service Fee				
Billed	G:8895	Mathes Auto Sal				
	3/2/2017	Morris. Otis				
\$55.00 paid to Dukes Inv. for service (Manheim).						
58013	TIME	JGS	0.10	285.00	28.50	28.50
2/10/2017		Phone to client	0.00	C@1		
Billed	G:8895	Mathes Auto Sal	0.00			
	3/2/2017	Morris. Otis	0.00			
Made telephone call to client (discussed status of case).						
58016	TIME	JGS	0.10	285.00	28.50	28.50
2/10/2017		Phone fr client	0.00	C@1		
Billed	G:8895	Mathes Auto Sal	0.00			
	3/2/2017	Morris. Otis	0.00			
Received telephone call from client (resumed conversation regarding status of matter).						
58014	TIME	JGS	0.10	285.00	28.50	28.50
2/10/2017		Phone to client	0.00	C@1		
Billed	G:8895	Mathes Auto Sal	0.00			
	3/2/2017					

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Made telephone call to Breon Walker concerning acceptance of service (not available; left message on voice mail); returned telephone call to Daniel Harms (not available; left message on voice mail).	Morris. Otis	0.00			
Total: 2/10/2017	Billable	0.50		252.50	252.50
	Unbillable	0.00		0.00	
	Total	0.50		252.50	
Transaction Date: 2/13/2017					
58034	RGS	0.50	150.00	75.00	75.00
2/13/2017	Prepared letter	0.00	C		
Billed	G:8895 3/2/2017 Mathes Auto Sal	0.00			
Prepared correspondence and copy of pleadings to serve Tarica Worthy; contacted process server.)	Morris. Otis	0.00			
58041	JGS	0.10	285.00	28.50	0.00
2/13/2017	Return call	0.10	C@1		
Billed	G:8895 3/2/2017 Mathes Auto Sal	0.00	No Charge		
Returned telephone call to John Mathes	Morris. Otis	0.00			
Total: 2/13/2017	Billable	0.50		75.00	75.00
	Unbillable	0.10		28.50	
	Total	0.60		103.50	
Transaction Date: 2/21/2017					
58072	JGS	0.10	285.00	28.50	28.50
2/21/2017	Review document	0.00	C@1		
Billed	G:8895 3/2/2017 Mathes Auto Sal	0.00			
Reviewed Affidavit of Personal Service upon Tarica Worthy issued by Henry Dukes.	Morris. Otis	0.00			
Total: 2/21/2017	Billable	0.10		28.50	28.50

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
<u>Transaction Date: 2/22/2017</u>					
58083	TIME	JGS	0.10	285.00	28.50
2/22/2017		Review Corres.	0.00	C@1	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Reviewed email from client concerning status of Morris. Otis		0.00			
case and responded to same.					
<u>Total: 2/22/2017</u>					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
<u>Transaction Date: 2/23/2017</u>					
58086	TIME	RGS	0.50	150.00	75.00
2/23/2017		Research	0.00	C	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Gathered information on Michael Moore so		Morris. Otis	0.00		
process server can serve Dixon's Automotive.					
58091	TIME	JGS	0.70	285.00	199.50
2/23/2017		Review document	0.00	C@1	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Reviewed Notice of roster meeting from Clerk of Morris. Otis		0.00			
Court; reviewed file; prepared email to Judge					
Benjamin's law clerk concerning status of case					
and previous grant of request for protection.					
58095	TIME	JGS	0.30	285.00	85.50
2/23/2017		Review Corres.	0.00	C@1	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Reviewed email from client and responded to		Morris. Otis	0.00		
same.					
58097	TIME	JGS	0.10	285.00	28.50
2/23/2017		Review Corres.	0.00	C@1	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Reviewed email from Anne Henley; prepared		Morris. Otis	0.00		
email to Anne Henley with copy of letter signed					
by Judge Benjamin.					
58102	TIME	JGS	0.10	285.00	28.50
2/23/2017		Review document	0.00	C@1	
Billed	G:8895	3/2/2017 Mathes Auto Sal	0.00		
Reviewed Notice of hearing on motion for		Morris. Otis	0.00		

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contempt sanctions from Clerk of Court.					
Total: 2/23/2017					
	Billable	1.70		417.00	417.00
	Unbillable	0.00		0.00	
	Total	1.70		417.00	
Transaction Date: 2/28/2017					
58121 TIME	JGS	0.20	285.00	57.00	57.00
2/28/2017	Review Corres.	0.00	C@1		
Billed G:8895 3/2/2017	Mathes Auto Sal	0.00			
Reviewed correspondence from Robert Goings with copies of motions to dismiss and to strike amended complaint on behalf of Manheim and NextGear.					
Total: 2/28/2017					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 3/1/2017					
58134 EXP	JGS	1	55.00	55.00	55.00
3/1/2017	Service Fee				
Billed G:8926 4/3/2017	Mathes Auto Sal				
\$55 paid to Dukes Investigations for service of pleadings upon Otis Morris.					
Total: 3/1/2017					
	Billable	0.00		55.00	55.00
	Unbillable	0.00		0.00	
	Total	0.00		55.00	
Transaction Date: 3/3/2017					
58154 TIME	JGS	0.10	285.00	28.50	28.50
3/3/2017	Review Corres.	0.00	C@1		
Billed G:8926 4/3/2017	Mathes Auto Sal	0.00			
Reviewed emails from Anne Henley confirming Judge Benjamin's grant of protection for week of March 20, 2017.					
Total: 3/3/2017					
	Billable	0.10	285.00	28.50	28.50
	Unbillable	0.00	C@1		
Billed G:8926 4/3/2017	Mathes Auto Sal	0.00			
Reviewed email from client concerning					
	Morris. Otis	0.00			

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
information found online.								
58166	TIME			JGS	0.10	285.00	28.50	28.50
3/3/2017				Review Corres.	0.00	C@1		
Billed	G:8926	4/3/2017	Mathes Auto Sal		0.00			
Reviewed email from client concerning request for follow up and replied to same.				Morris. Otis	0.00			
58169	TIME			JGS	0.60	285.00	171.00	171.00
3/3/2017				Review Corres.	0.00	C@1		
Billed	G:8926	4/3/2017	Mathes Auto Sal		0.00			
Reviewed copies of correspondence and Answer of Otis Morris, Jr. and Pro Bowl Motors, Inc. emailed by Ron Stanley's assistant; prepared email to client with copy of same; made telephone call to Breon Walker (not available; left message on voice mail).				Morris. Otis	0.00			
Total: 3/3/2017								
				Billable	0.90		256.50	256.50
				Unbillable	0.00		0.00	
				Total	0.90		256.50	
<u>Transaction Date: 3/4/2017</u>								
58171	TIME			JGS	0.10	285.00	28.50	0.00
3/4/2017				Review document	0.10	C@1		
Billed	G:8926	4/3/2017	Mathes Auto Sal		0.00	No Charge		
Reviewed hard copies of correspondence to Clerk of Court and Answer from Ron Stanley.				Morris. Otis	0.00			
58173	TIME			JGS	0.10	285.00	28.50	0.00
3/4/2017				Review Corres.	0.10	C@1		
Billed	G:8926	4/3/2017	Mathes Auto Sal		0.00	No Charge		
Reviewed email from client and responded to same.				Morris. Otis	0.00			
Total: 3/4/2017								
				Billable	0.00		0.00	0.00
				Unbillable	0.20		57.00	
				Total	0.20		57.00	
<u>Transaction Date: 3/7/2017</u>								
58196	TIME			JGS	0.60	285.00	171.00	171.00
3/7/2017				Review File	0.00	C@1		
Billed	G:8926	4/3/2017	Mathes Auto Sal		0.00			
Reviewed file; prepared for meeting with client;				Morris. Otis	0.00			

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Slip ID		Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
made telephone call to Breon Walker (has not been retained by Tarica Worthy).						
58199	TIME	JGS	2.50	285.00	712.50	712.50
3/7/2017		Review File	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Resumed review of file and prepared for meeting Morris. Otis			0.00			
with client; made telephone call to Inv. Duckett (not available; left message on voice mail); returned telephone call to Michael Moore (discussed status of case).						
58202	TIME	JGS	1.30	285.00	370.50	370.50
3/7/2017		Review File	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Resumed review of file; reviewed deposition of Otis Morris.			0.00			
Total: 3/7/2017						
		Billable	4.40		1254.00	1254.00
		Unbillable	0.00		0.00	
		Total	4.40		1254.00	
Transaction Date: 3/8/2017						
58205	TIME	RGS	0.40	150.00	60.00	60.00
3/8/2017		Review document	0.00	C		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Reviewed Defendants Manheim Remarketing, Inc. and Nextgear Capital's Motion to Dismiss and to Strike Plaintiffs Amended Complaint; researched SCRCP 15(a) to determine if motion is well founded.			0.00			
58206	TIME	JGS	4.30	285.00	1225.50	1225.50
3/8/2017		Review File	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Resumed review of file; made telephone call to client to suggest that he speak with Tarica Worthy if opportunity arises when he goes by her residence to check for vehicle; made telephone call to Robert Goings (not available; left message with Katie); prepared correspondence to Robert Goings.			0.00			
58207	TIME	JGS	0.40	285.00	114.00	114.00
3/8/2017		Review/Execute	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			

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			Reviewed and executed correspondence to Robert Goings; hand-delivered same; reviewed and executed correspondence to Michael Moore for service by certified mail.		Morris. Otis	0.00			
58214	EXP			JGS		1	7.50	7.50	7.50
	3/8/2017				Service Fee				
	Billed	G:8926	4/3/2017		Mathes Auto Sal				
			\$7.50 paid to Postmaster for service of Amended Pleadings upon Michael Moore as registered agent for Dixon's.		Morris. Otis				
Total: 3/8/2017									
				Billable		5.10		1407.00	1407.00
				Unbillable		0.00		0.00	
				Total		5.10		1407.00	
Transaction Date: 3/9/2017									
58227	TIME			JGS		0.10	285.00	28.50	28.50
	3/9/2017				Review Corres.	0.00	C@1		
	Billed	G:8926	4/3/2017		Mathes Auto Sal	0.00			
			Reviewed email from Priscilla Jackson with copies of Notice of Service of Process; reviewed email from Priscilla Jackson requesting extension of time.		Morris. Otis	0.00			
58223	TIME			JGS		0.10	285.00	28.50	28.50
	3/9/2017				Phone fr client	0.00	C@1		
	Billed	G:8926	4/3/2017		Mathes Auto Sal	0.00			
			Received telephone call from Priscilla Jackson at Travelers Bond (requested copy of Answer from Morris and ProBowl); scanned and emailed same.		Morris. Otis	0.00			
58220	TIME			JGS		1.00	285.00	285.00	285.00
	3/9/2017				Phone to client	0.00	C@1		
	Billed	G:8926	4/3/2017		Mathes Auto Sal	0.00			
			Made telephone call to Phil Porter at SCDMV per Inv. Pugh's message; reviewed emails from client concerning contact by Auto Owners; returned telephone call to client concerning same; made telephone call to Mitchell Gardner (not available; left message on voice mail); returned telephone call to Daniel Harms concerning status of matter.		Morris. Otis	0.00			

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58217	TIME			JGS	0.40	285.00	114.00	114.00
	3/9/2017			Review File	0.00	C@1		
	Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00			
				Morris. Otis	0.00			
			Reviewed file; made telephone call to Inv. Terry Pugh with SCDMV Dealer License and Audit Unit; made telephone call to Tammy Burns at Palmetto Citizens Federal Credit Union (not available; left message on voice mail); made telephone call to Daniel Harms at SCFCU (not available; left message on voice mail).					
Total: 3/9/2017								
				Billable	1.60		456.00	456.00
				Unbillable	0.00		0.00	
				Total	1.60		456.00	
Transaction Date: 3/10/2017								
58232	TIME			RGS	0.30	150.00	45.00	45.00
	3/10/2017			Research	0.00	C		
	Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00			
				Morris. Otis	0.00			
			Researched negative inference of a Fifth Amendment privilege in civil case; researched authority for the proposition that a thief acquires no title to stolen property and therefore cannot convey title.					
58235	TIME			JGS	0.20	285.00	57.00	57.00
	3/10/2017			Prepare documen	0.00	C@1		
	Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00			
				Morris. Otis	0.00			
			Prepared memo to associate concerning research on inferences arising from taking Fifth Amendment privilege in a civil case; reviewed email from client and responded to same.					
58239	TIME			JGS	0.30	285.00	85.50	85.50
	3/10/2017			Review Corres.	0.00	C@1		
	Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00			
				Morris. Otis	0.00			
			Reviewed emails from client; returned telephone call to client (discussed limits on representation); forwarded copies of pleadings and deposition.					
58241	TIME			JGS	0.50	285.00	142.50	142.50
	3/10/2017			Review Corres.	0.00	C@1		
	Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00			
				Morris. Otis	0.00			
			Reviewed copies of correspondence and Answer to Amended Complaint from Christy C. Jones,					

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Esq. to Clerk of Court; reviewed research materials provided by associate.					
Total: 3/10/2017					
	Billable	1.30		330.00	330.00
	Unbillable	0.00		0.00	
	Total	1.30		330.00	
Transaction Date: 3/14/2017					
58255	TIME	JGS	0.10	285.00	28.50
3/14/2017	Return call	0.10	C@1		0.00
Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00	No Charge
Returned telephone call to Breon Walker (not available; left message on voice mail).					
58258	TIME	JGS	0.10	285.00	28.50
3/14/2017	Review Corres.	0.00	C@1		28.50
Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00	
Reviewed email from client concerning status of Morris. Otis matter and replied to same.					
58263	TIME	JGS	0.20	285.00	57.00
3/14/2017	Return call	0.20	C@1		0.00
Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00	No Charge
Returned telephone call to John Mathes (discussed status of case).					
58266	TIME	JGS	0.10	285.00	28.50
3/14/2017	Review Corres.	0.10	C@1		0.00
Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00	No Charge
Reviewed email from client concerning Terry Pugh's upcoming retirement and replied to same.					
58272	TIME	JGS	0.50	285.00	142.50
3/14/2017	Phone fr client	0.00	C@1		142.50
Billed	G:8926	4/3/2017	Mathes Auto Sal	0.00	
Received telephone call from Breon Walker (discussed status of case; complained about client's request for copy of temporary registration card from Tarica Worthy but still does not represent her); made telephone call to client to suggest that he let matter sit for a while.					

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 3/14/2017					
	Billable	0.60		171.00	171.00
	Unbillable	0.40		114.00	
	Total	1.00		285.00	
Transaction Date: 3/15/2017					
58278	TIME	JGS			
3/15/2017	Review Corres.	2.30	285.00	655.50	655.50
Billed	G:8926 4/3/2017 Mathes Auto Sal	0.00	C@1		
Reviewed email from client and responded to same; made telephone call to Mitchell Gardner at Auto-Owners per client's request (not available; left message on voice mail); reviewed file; made telephone call to client concerning follow up on service on Michael Moore and suggested intervention by DMV; made telephone call to Phil Porter (not available; left message on voice mail); made telephone call to Michael Moore; made telephone call to Christy Jones.		0.00			
58279	TIME	JGS			
3/15/2017	Review File	1.00	285.00	285.00	285.00
Billed	G:8926 4/3/2017 Mathes Auto Sal	0.00	C@1		
Resumed review of file; prepared correspondence to Clerk of Court for filing Affidavits of Service upon Otis Morris, Jr. individually, Otis Morris, Jr. as registered agent for Pro Bowl Motors, Inc., Tarica Worthy, and Manheim Remarketing, Inc.; received telephone call from Mitchell Gardner (could not convince him that we had not filed against our own bond); prepared Affidavits of Compliance for Travelers and Auto-Owners; received telephone call from client concerning Auto-Owners confusion over bond; reviewed and executed correspondence to Clerk of Court with Affidavits of Service.		0.00			
58283	TIME	JGS			
3/15/2017	Review Corres.	0.70	285.00	199.50	199.50
Billed	G:8926 4/3/2017 Mathes Auto Sal	0.00	C@1		
Reviewed email from Leslie Clamp to Justice Toal with copy of Defendant's Memorandum in Support of Motion To Dismiss, or in the Alternative, Summary Judgment and replied to same regarding Judge Benjamin's previous grant of my request for protection.		0.00			

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							DNB Time	Rate Info		Adjustment
							Est. Time	Bill Status		Markup
							Variance			
58285	TIME			JGS			0.10	285.00	28.50	0.00
3/15/2017					Return call		0.10	C@1		
Billed	G:8926	4/3/2017		Mathes Auto Sal			0.00	No Charge		
Returned telephone call to Preston Dawkins at Aiken Bridges (not available; left message on voice mail).										
Total: 3/15/2017										
				Billable			4.00		1140.00	1140.00
				Unbillable			0.10		28.50	
				Total			4.10		1168.50	
Transaction Date: 3/16/2017										
58301	TIME			JGS			0.30	285.00	85.50	85.50
3/16/2017					Review document		0.00	C@1		
Billed	G:8926	4/3/2017		Mathes Auto Sal			0.00			
Reviewed Rule 15, SCRCP; reviewed and executed coversheet; reviewed and executed Affidavits of Compliance.										
58297	TIME			JGS			0.10	285.00	28.50	28.50
3/16/2017					Review/Revise		0.00	C@1		
Billed	G:8926	4/3/2017		Mathes Auto Sal			0.00			
Reviewed and revised motion coversheet; reviewed and executed Affidavits of Compliance.										
58302	TIME			JGS			0.20	285.00	57.00	57.00
3/16/2017					Review Corres.		0.00	C@1		
Billed	G:8926	4/3/2017		Mathes Auto Sal			0.00			
Reviewed email from client concerning potential consequences of payment into court by Auto-Owners; made telephone call to Preston Dawkins (not available); prepared email to Preston Dawkins concerning status of default.										
58288	TIME			JGS			1.00	285.00	285.00	285.00
3/16/2017					Preparation		0.00	C@1		
Billed	G:8926	4/3/2017		Mathes Auto Sal			0.00			
Forwarded copy of NextGear's memo to Christy Jones along with emails regarding protection; received telephone call from client concerning status of case.										
58293	TIME			JGS			0.20	285.00	57.00	57.00
3/16/2017					Review Corres.		0.00	C@1		
Billed	G:8926	4/3/2017		Mathes Auto Sal			0.00			
Reviewed email from client regarding										

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Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
Auto-Owners' bond for Dixon's and responded to same.						
58292	TIME	JGS	0.30	285.00	85.50	85.50
3/16/2017		Phone fr client	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Received telephone call from Preston Dawkins concerning status of case (may be willing to pay Auto-Owens' bond); prepared email to client concerning same.						
58294	TIME	JGS	0.10	285.00	28.50	28.50
3/16/2017		Review/Revise	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Reviewed and revised motion to amend and certificates of compliance.						
Total: 3/16/2017						
		Billable	2.20		627.00	627.00
		Unbillable	0.00		0.00	
		Total	2.20		627.00	
Transaction Date: 3/20/2017						
58314	TIME	RGS	0.50	150.00	75.00	75.00
3/20/2017		Research	0.00	C		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Researched whether a motion to dismiss is a responsive pleading under Rule 15, SCRCP.						
Total: 3/20/2017						
		Billable	0.50		75.00	75.00
		Unbillable	0.00		0.00	
		Total	0.50		75.00	
Transaction Date: 3/21/2017						
58317	TIME	RGS	0.30	150.00	45.00	45.00
3/21/2017		Conference	0.00	C		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Consulted JGS regarding filing Motion to Amend in light of the research indicating that Motion to Dismiss is not a responsive pleading under Rule 15, SCRCP.						
Total: 3/21/2017						
		Billable	0.30		45.00	45.00

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	0.10		28.50	

Transaction Date: 3/28/2017

58372	TIME	JGS	1.70	285.00	484.50	484.50
3/28/2017		Prepared letter	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Replied to email from client; reviewed and organized file to prepare for call from Robert Goings; made telephone call to Michael Moore concerning status of case (advised that he picked up pleadings from Post Office yesterday and delivered to Twana Burris in Rock Hill); received telephone call from client concerning status of case.						
58374	TIME	JGS	1.90	285.00	541.50	541.50
3/28/2017		Review File	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Resumed review of file and prepared for call from Morris. Otis						
Robert Goings; received telephone call from Robert Goings and Gary Hoke (discussed NextGear's proposal); made telephone call to client to convey substance of conversation; prepared notes for proposed Release.						
58375	TIME	JGS	0.60	285.00	171.00	171.00
3/28/2017		Review Corres.	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Reviewed email from Robert Goings and replied to same with my understanding of NextGear's proposal.						
58370	TIME	JGS	0.10	285.00	28.50	0.00
3/28/2017		Review Corres.	0.10	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00	No Charge		
Reviewed email from client; returned telephone call to client (not available; left message on voice mail).						
58369	TIME	RGS	4.50	150.00	675.00	675.00
3/28/2017		Research	0.00	C		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Researched applicability of forum selection clause to non-signatories to underlying contract; drafted summary of research.						

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	0.30		45.00	
<u>Transaction Date: 3/24/2017</u>					
58324	TIME	JGS	0.20	285.00	57.00
3/24/2017		Review Corres.	0.00	C@1	57.00
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00		
Reviewed email from Robert Goings concerning Morris. Otis interest in scheduling a conference to discuss settlement; made telephone call to client to advise.					
			0.00		
58325	TIME	JGS	0.30	285.00	85.50
3/24/2017		Review document	0.00	C@1	85.50
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00		
Reviewed cases identified by associate addressing definition of "a responsive pleading" under Rule 15, SCRCP.					
		Morris. Otis	0.00		
58326	TIME	JGS	0.10	285.00	28.50
3/24/2017		Review Corres.	0.00	C@1	28.50
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00		
Reviewed copy of correspondence from Ron Stanley to Judge Benjamin requesting continuance of contempt hearing.					
		Morris. Otis	0.00		
<u>Total: 3/24/2017</u>					
	Billable	0.60		171.00	171.00
	Unbillable	0.00		0.00	
	Total	0.60		171.00	
<u>Transaction Date: 3/27/2017</u>					
58358	TIME	JGS	0.10	285.00	28.50
3/27/2017		Review Corres.	0.00	C@1	28.50
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00		
Reviewed email from Robert Goings concerning scheduling conference call to discuss options to resolve dispute; made telephone call to Robert Goings (not available; scheduled call for tomorrow at 2:00); prepared email to client concerning same.					
		Morris. Otis	0.00		
<u>Total: 3/27/2017</u>					
	Billable	0.10		28.50	28.50

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Total: 3/28/2017					
	Billable	8.70		1872.00	1872.00
	Unbillable	0.10		28.50	
	Total	8.80		1900.50	
Transaction Date: 3/29/2017					
58387	TIME	JGS	0.50	285.00	142.50
3/29/2017	Review document		0.00	C@1	142.50
Billed	G:8926 4/3/2017	Mathes Auto Sal	0.00		
Reviewed Memorandum prepared by associate on enforceability of forum selection clause; reviewed email from Robert Goings concerning substance of agreement; made telephone call to client (secured his consent to resolution with NextGear to remove any possibility of defeat at motion hearing next week and any liability to NextGear).		Morris. Otis	0.00		
58390	TIME	JGS	0.40	285.00	114.00
3/29/2017	Review Corres.		0.00	C@1	
Billed	G:8926 4/3/2017	Mathes Auto Sal	0.00		
Reviewed email from client and responded to same; office conference with associate concerning status of matter.		Morris. Otis	0.00		
58392	TIME	JGS	1.00	285.00	285.00
3/29/2017	Review File		0.00	C@1	
Billed	G:8926 4/3/2017	Mathes Auto Sal	0.00		
Reviewed file; began drafting settlement documents for claims concerning NextGear.		Morris. Otis	0.00		
58394	TIME	JGS	3.90	285.00	1111.50
3/29/2017	Review File		0.00	C@1	
Billed	G:8926 4/3/2017	Mathes Auto Sal	0.00		
Resumed review of file and preparation of settlement documents; received telephone call from Preston Dawkins concerning status of matter, prepared email to client concerning status of case.		Morris. Otis	0.00		
Total: 3/29/2017					
	Billable	5.80		1653.00	1653.00
	Unbillable	0.00		0.00	
	Total	5.80		1653.00	

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Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
<u>Transaction Date: 3/30/2017</u>						
58405	TIME	JGS	0.70	285.00	199.50	199.50
3/30/2017		Review/Revise	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Reviewed and revised final draft of Settlement Agreement And Mutual Release; made telephone call to Christy Jones (not available; left message on voice mail); made telephone call to client to request that he contact Worthy to advise that matter was proceeding toward resolution.						
58409	TIME	JGS	0.30	285.00	85.50	85.50
3/30/2017		Review document	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Reviewed final draft of proposed Settlement Agreement And Release.						
Total: 3/30/2017						
		Billable	1.00		285.00	285.00
		Unbillable	0.00		0.00	
		Total	1.00		285.00	
<u>Transaction Date: 3/31/2017</u>						
58420	TIME	JGS	0.20	285.00	57.00	57.00
3/31/2017		Review Corres.	0.00	C@1		
Billed	G:8926	4/3/2017 Mathes Auto Sal	0.00			
Reviewed email from Robert Goings with proposed modifications to Settlement Agreement.						
Total: 3/31/2017						
		Billable	0.20		57.00	57.00
		Unbillable	0.00		0.00	
		Total	0.20		57.00	
<u>Transaction Date: 4/3/2017</u>						
58424	TIME	JGS	0.10	285.00	28.50	28.50
4/3/2017		Review Corres.	0.00	C@1		
Billed	G:8957	5/2/2017 Mathes Auto Sal	0.00			
Reviewed email from client concerning NextGear's proposed changes to settlement agreement and replied to same concerning status of case.						

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58427	TIME			JGS				1.80		285.00		513.00		513.00	
4/3/2017					Travel			0.00		C@1					
Billed	G:8957		5/2/2017	Mathes Auto Sal				0.00							
			Traveled to and from Richland County Judicial Center, attended roster meeting; reviewed Rule 40, SCRCP; prepared correspondence to Judge Benjamin concerning status of matter and 120 day provision of Rule 40(h), SCRCP; reviewed email from client concerning NextGear's proposed modifications.	Morris. Otis				0.00							
58429	TIME			JGS				0.10		285.00		28.50		28.50	
4/3/2017					Review/Revise			0.00		C@1					
Billed	G:8957		5/2/2017	Mathes Auto Sal				0.00							
			Reviewed and revised correspondence to Judge Benjamin.	Morris. Otis				0.00							
58431	TIME			JGS				0.10		285.00		28.50		28.50	
4/3/2017					Review/Execute			0.00		C@1					
Billed	G:8957		5/2/2017	Mathes Auto Sal				0.00							
			Reviewed and executed correspondence.	Morris. Otis				0.00							
58434	TIME			JGS				0.10		285.00		28.50		0.00	
4/3/2017					Review Corres.			0.10		C@1					
Billed	G:8957		5/2/2017	Mathes Auto Sal				0.00		No Charge					
			Reviewed email from client concerning payment sent and progress with Manheim and responded to same; reviewed copy of email from Ron Stanley to Judge Benjamin concerning previous request for continuance and replied to same.	Morris. Otis				0.00							
58436	TIME			JGS				0.10		285.00		28.50		28.50	
4/3/2017					Phone fr client			0.00		C@1					
Billed	G:8957		5/2/2017	Mathes Auto Sal				0.00							
			Received telephone call from Twana Burris-Aleide (advised that she does not represent Mr. Moore or his LLC).	Morris. Otis				0.00							
Total: 4/3/2017															
				Billable				2.20				627.00		627.00	
				Unbillable				0.10				28.50			
				Total				2.30				655.50			
Transaction Date: 4/4/2017															
58447	TIME			JGS				0.30		285.00		85.50		85.50	
4/4/2017					Prepared letter			0.00		C@1					
Billed	G:8957		5/2/2017	Mathes Auto Sal				0.00							

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Prepared email to client concerning status of matter.	Morris. Otis	0.00			
58446	JGS	0.20	285.00	57.00	57.00
4/4/2017	Conference	0.00	C@1		
Billed	G:8957 5/2/2017 Mathes Auto Sal	0.00			
Office conference with associate concerning research on "waiver" and other proposed modifications to Settlement Agreement.	Morris. Otis	0.00			
58441	JGS	0.60	285.00	171.00	171.00
4/4/2017	Review document	0.00	C@1		
Billed	G:8957 5/2/2017 Mathes Auto Sal	0.00			
Reviewed proposed Settlement Agreement And Release and modified document submitted by Robert Goings.	Morris. Otis	0.00			
58440	RGS	1.30	150.00	195.00	195.00
4/4/2017	Review document	0.00	C		
Billed	G:8957 5/2/2017 Mathes Auto Sal	0.00			
Reviewed original proposed Settlement Agreement between Mathes and Nextgear prepared by JGS, as well as revised version produced by Nextgear; researched exculpatory language, particularly the proposed substitution of the word "waive" instead of "delete".	Morris. Otis	0.00			
Total: 4/4/2017	Billable	2.40		508.50	508.50
	Unbillable	0.00		0.00	
	Total	2.40		508.50	
<u>Transaction Date: 4/5/2017</u>					
58451	JGS	0.10	285.00	28.50	28.50
4/5/2017	Review Corres.	0.00	C@1		
Billed	G:8957 5/2/2017 Mathes Auto Sal	0.00			
Reviewed email from client concerning status of settlement agreement and responded to same.	Morris. Otis	0.00			
Total: 4/5/2017	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	

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<u>Transaction Date: 4/7/2017</u>								
58461	TIME			JGS	0.10	285.00	28.50	28.50
4/7/2017				Phone fr client	0.00	C@1		
Billed	G:8957	5/2/2017	Mathes Auto Sal		0.00			
Received telephone call from client (discussed claim against Dixon's bond and principle of judicial estoppel).								
Morris. Otis								
Total: 4/7/2017								
				Billable	0.10		28.50	28.50
				Unbillable	0.00		0.00	
				Total	0.10		28.50	
<u>Transaction Date: 4/12/2017</u>								
58496	TIME			JGS	0.40	285.00	114.00	114.00
4/12/2017				Review Corres.	0.00	C@1		
Billed	G:8957	5/2/2017	Mathes Auto Sal		0.00			
Reviewed correspondence from Leland B. Greeley, Esq. with copy of Answer; reviewed copy of correspondence from Leland Greeley to Clerk of Court; compared Answer with Amended Complaint; prepared email to Robert Goings concerning proposed changes to Settlement Agreement.								
Morris. Otis								
Total: 4/12/2017								
				Billable	0.40		114.00	114.00
				Unbillable	0.00		0.00	
				Total	0.40		114.00	
<u>Transaction Date: 4/19/2017</u>								
58558	TIME			JGS	1.30	285.00	370.50	370.50
4/19/2017				Review Corres.	0.00	C@1		
Billed	G:8957	5/2/2017	Mathes Auto Sal		0.00			
Reviewed email from Robert Goings and responded to same; prepared email to client concerning planned call with Robert Goings at 4:30; reviewed file; prepared for call.								
Morris. Otis								
Total: 4/19/2017								
				Billable	1.30		370.50	370.50
				Unbillable	0.00		0.00	
				Total	1.30		370.50	

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
<u>Transaction Date: 4/20/2017</u>					
58566	JGS	0.20	285.00	57.00	57.00
4/20/2017	Review document	0.00	C@1		
Billed	G:8957 5/2/2017 Mathes Auto Sal	0.00			
Reviewed Notices of hearing from Clerk of Court Morris. Otis concerning Manheim's and NextGear's motions; prepared email to Ann Henley to remind her that motions had been withdrawn.		0.00			
Total: 4/20/2017					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
<u>Transaction Date: 5/3/2017</u>					
58684	JGS	0.40	285.00	114.00	114.00
5/3/2017	Review Corres.	0.00	C@1		
Billed	G:8988 6/1/2017 Mathes Auto Sal	0.00			
Reviewed email from Robert Goings with final Settlement Agreement.		0.00			
Total: 5/3/2017					
	Billable	0.40		114.00	114.00
	Unbillable	0.00		0.00	
	Total	0.40		114.00	
<u>Transaction Date: 5/7/2017</u>					
58721	JGS	0.70	285.00	199.50	199.50
5/7/2017	Review document	0.00	C@1		
Billed	G:8988 6/1/2017 Mathes Auto Sal	0.00			
Reviewed triplicate originals of settlement agreement signed, dated, and returned by client; prepared email to Robert Goings concerning same; prepared proposed Order of Dismissal; prepared correspondence to Robert Goings with same.		0.00			
Total: 5/7/2017					
	Billable	0.70		199.50	199.50
	Unbillable	0.00		0.00	
	Total	0.70		199.50	

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
<u>Transaction Date: 5/8/2017</u>						
58733	TIME	JGS	0.10	285.00	28.50	28.50
5/8/2017		Review/Execute	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Reviewed and executed correspondence.			Morris. Otis	0.00		
Total: 5/8/2017						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	
<u>Transaction Date: 5/15/2017</u>						
58754	TIME	JGS	0.20	285.00	57.00	57.00
5/15/2017		Return call	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Returned telephone call to Sabrina Burgess concerning status of motions; prepared email to Robert Goings concerning status of case.			Morris. Otis	0.00		
58760	TIME	JGS	0.30	285.00	85.50	85.50
5/15/2017		Review Corres.	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Reviewed email from Robert Goings; reviewed file; responded to email from Robert Goings; prepared email to Breon Walker regarding same.			Morris. Otis	0.00		
Total: 5/15/2017						
		Billable	0.50		142.50	142.50
		Unbillable	0.00		0.00	
		Total	0.50		142.50	
<u>Transaction Date: 5/16/2017</u>						
58774	TIME	JGS	0.10	285.00	28.50	28.50
5/16/2017		Review Corres.	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Reviewed email from Breon Walker and responded to same.			Morris. Otis	0.00		
Total: 5/16/2017						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
<u>Transaction Date: 5/23/2017</u>						
58833	TIME	JGS	0.10	285.00	28.50	28.50
5/23/2017		Review Corres.	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Reviewed email from Preston Dawkins concerning status of case; made telephone call to Sabrina Davis (not available; left message on voice mail); returned telephone call to Preston Dawkins (not available; left message on voice mail).						
		Morris. Otis	0.00			
58835	TIME	JGS	0.30	285.00	85.50	85.50
5/23/2017		Phone fr client	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Received telephone call from Preston Dawkins (raised "owner of an automobile" issue).						
		Morris. Otis	0.00			
Total: 5/23/2017						
		Billable	0.40		114.00	114.00
		Unbillable	0.00		0.00	
		Total	0.40		114.00	
<u>Transaction Date: 5/25/2017</u>						
58854	TIME	JGS	0.10	285.00	28.50	28.50
5/25/2017		Review Corres.	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Reviewed copies of correspondence and Notice of Appearance from Preston Dawkins to Clerk of Court.						
		Morris. Otis	0.00			
Total: 5/25/2017						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	
<u>Transaction Date: 5/30/2017</u>						
58866	TIME	JGS	0.10	285.00	28.50	28.50
5/30/2017		Review Corres.	0.00	C@1		
Billed	G:8988	6/1/2017 Mathes Auto Sal	0.00			
Reviewed email from client concerning status of Morris. Otis case and responded to same.						
		Morris. Otis	0.00			
Total: 5/30/2017						
		Billable	0.10		28.50	28.50

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	0.10		28.50	

Transaction Date: 6/6/2017

58910	TIME	JGS	0.10	285.00	28.50	28.50
6/6/2017		Review Corres.	0.00	C@1		
Billed	G:9025	7/2/2017 Mathes Auto Sal	0.00			
Reviewed correspondence from Robert Goings with Order of Dismissal bearing his consent and a Settlement Agreement And Mutual Releases with an original signature page for Next Gear and Manheim.			0.00			

Total: 6/6/2017

Billable	0.10	28.50	28.50
Unbillable	0.00	0.00	
Total	0.10	28.50	

Transaction Date: 6/8/2017

58938	TIME	JGS	0.30	285.00	85.50	85.50
6/8/2017		Prepared letter	0.00	C@1		
Billed	G:9025	7/2/2017 Mathes Auto Sal	0.00			
Prepared correspondence to Judge Benjamin with proposed consent Order for execution and filing; made telephone call to client (confirmed that auction had restored his privileges to buy cars).			0.00			

58939	TIME	JGS	0.20	285.00	57.00	57.00
6/8/2017		Review/Revise	0.00	C@1		
Billed	G:9025	7/2/2017 Mathes Auto Sal	0.00			
Reviewed and revised correspondence; prepared order information form and cover sheet; issued check for filing fee.			0.00			

58940	EXP	JGS	1	25.00	25.00	25.00
6/8/2017		Filing Fee				
Billed	G:9025	7/2/2017 Mathes Auto Sal				
\$25.00 paid to Clerk of Court for filing fee.						

58941	TIME	JGS	2.40	285.00	684.00	684.00
6/8/2017		Phone to client	0.00	C@1		
Billed	G:9025	7/2/2017 Mathes Auto Sal	0.00			
Made telephone call to Preston Dawkins (not available; left message on voice mail); reviewed and organized file; made telephone call to Breon Walker (not available; left message on voice			0.00			

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
mail); made telephone call to Tarica Worthy (discussed proposed assignment of claim against Auto Owners); made telephone call to Christy Jones (not available; left message on voice mail); received telephone call from client regarding status of case; made telephone call to Sabrina Burgess (advised that Christy Jones is handling matter again); returned telephone call to Preston Dawkins (not available; left message on voice mail).					
Total: 6/8/2017	Billable	2.90		851.50	851.50
	Unbillable	0.00		0.00	
	Total	2.90		851.50	
Transaction Date: 6/9/2017					
58949	TIME	JGS	0.20	285.00	57.00
6/9/2017		Review Corres.	0.00	C@1	
Billed	G:9025	7/2/2017 Mathes Auto Sal	0.00		
Reviewed email from client concerning Next Gear's failure to provide certificate of title to credit union and impact on our claim against Dixon's bond; reviewed email from Christy Jones and responded to same.		Morris. Otis	0.00		
Total: 6/9/2017	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 6/12/2017					
58964	TIME	JGS	0.10	285.00	28.50
6/12/2017		Prepared letter	0.00	C@1	
Billed	G:9025	7/2/2017 Mathes Auto Sal	0.00		
Prepared email to Robert Goings regarding delivery of certificate of title to credit union.		Morris. Otis	0.00		
58973	TIME	JGS	0.10	285.00	28.50
6/12/2017		Review Corres.	0.00	C@1	
Billed	G:9025	7/2/2017 Mathes Auto Sal	0.00		
Reviewed email from Robert Goings regarding certificate of title; forwarded same to client.		Morris. Otis	0.00		

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Total: 6/12/2017					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 6/13/2017					
58981 TIME	JGS	0.10	285.00	28.50	28.50
6/13/2017	Review Corres.	0.00	C@1		
Billed G:9025 7/2/2017	Mathes Auto Sal	0.00			
Reviewed email from Clerk of Court regarding non-jury roster meeting; forwarded same to client.					
	Morris. Otis	0.00			
58985 TIME	JGS	0.30	285.00	85.50	85.50
6/13/2017	Phone fr client	0.00	C@1		
Billed G:9025 7/2/2017	Mathes Auto Sal	0.00			
Received telephone call from Preston Dawkins (discussed assignment of claim against bond); prepared email to client regarding same.					
	Morris. Otis	0.00			
Total: 6/13/2017					
	Billable	0.40		114.00	114.00
	Unbillable	0.00		0.00	
	Total	0.40		114.00	
Transaction Date: 6/14/2017					
58994 TIME	JGS	0.10	285.00	28.50	28.50
6/14/2017	Prepare documen	0.00	C@1		
Billed G:9025 7/2/2017	Mathes Auto Sal	0.00			
Prepared email to client regarding preparation for non-jury hearing on July 10, 2017.					
	Morris. Otis	0.00			
Total: 6/14/2017					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Transaction Date: 6/15/2017					
59008 TIME	JGS	0.50	285.00	142.50	142.50
6/15/2017	Return call	0.00	C@1		
Billed G:9025 7/2/2017	Mathes Auto Sal	0.00			
Returned telephone call to John Mathes (discussed status of case and trial preparation).					
	Morris. Otis	0.00			

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59013 6/15/2017 Billed G:9025 7/2/2017 Reviewed email from client regarding using Don Morris. Otis Deese as a witness and responded to same.	JGS Review Corres. Mathes Auto Sal	0.10 0.00 0.00 0.00	285.00 C@1	28.50	28.50
Total: 6/15/2017	Billable Unbillable Total	0.60 0.00 0.60		171.00 0.00 171.00	171.00
<u>Transaction Date: 6/19/2017</u>					
59044 6/19/2017 Billed G:9025 7/2/2017 Reviewed financial statements from Munn & Associates, PC faxed by client.	JGS Review document Mathes Auto Sal Morris. Otis	0.10 0.00 0.00 0.00	285.00 C@1	28.50	28.50
59040 6/19/2017 Billed G:9025 7/2/2017 Reviewed correspondence, interrogatories, and request for production from Ron Stanley; prepared email to client regarding same.	JGS Review Corres. Mathes Auto Sal Morris. Otis	0.20 0.00 0.00 0.00	285.00 C@1	57.00	57.00
Total: 6/19/2017	Billable Unbillable Total	0.30 0.00 0.30		85.50 0.00 85.50	85.50
<u>Transaction Date: 6/20/2017</u>					
59071 6/20/2017 Billed G:9025 7/2/2017 Received telephone call from Robert Goings regarding receipt of certificate of title; declined his request to deliver it to me and suggested that he deliver to Christy Jones; prepared email to client regarding same.	JGS Phone fr client Mathes Auto Sal Morris. Otis	0.30 0.00 0.00 0.00	285.00 C@1	85.50	85.50
Total: 6/20/2017	Billable Unbillable Total	0.30 0.00 0.30		85.50 0.00 85.50	85.50

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
<u>Transaction Date: 6/21/2017</u>									
59082	TIME			JGS		0.10	285.00	28.50	28.50
	6/21/2017			Review Corres.		0.00	C@1		
Billed	G:9025	7/2/2017		Mathes Auto Sal		0.00			
Reviewed email from client concerning Tarica Morris. Otis									
Worthy's plans to be out of the country the week of July 10 and responded to same.									
59084	TIME			JGS		0.10	285.00	28.50	28.50
	6/21/2017			Review document		0.00	C@1		
Billed	G:9025	7/2/2017		Mathes Auto Sal		0.00			
Reviewed Notice of ADR from Clerk of Court. Morris. Otis									
Total: 6/21/2017									
				Billable		0.20		57.00	57.00
				Unbillable		0.00		0.00	
				Total		0.20		57.00	
<u>Transaction Date: 6/27/2017</u>									
59127	TIME			JGS		0.30	285.00	85.50	85.50
	6/27/2017			Review Corres.		0.00	C@1		
Billed	G:9025	7/2/2017		Mathes Auto Sal		0.00			
Reviewed email from Preston Dawkins and responded to same.									
Total: 6/27/2017									
				Billable		0.30		85.50	85.50
				Unbillable		0.00		0.00	
				Total		0.30		85.50	
<u>Transaction Date: 6/29/2017</u>									
59151	TIME			JGS		0.80	285.00	228.00	228.00
	6/29/2017			Review Corres.		0.00	C@1		
Billed	G:9025	7/2/2017		Mathes Auto Sal		0.00			
Reviewed correspondence from Robert F. Morris. Otis									
Goings with Certificate of Title; prepared email to Robert Goings regarding hot potato; made telephone call to Christy Jones (not available; left message on voice mail); forwarded copy of email to Christy Jones; prepared email to client regarding same.									
Total: 6/29/2017									
				Billable		0.80		228.00	228.00

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
	Unbillable	0.00		0.00	
	Total	0.80		228.00	
<u>Transaction Date: 6/30/2017</u>					
59161 TIME	JGS	3.60	285.00	1026.00	1026.00
6/30/2017	Review File	0.00	C@1		
Billed G:9025 7/2/2017	Mathes Auto Sal	0.00			
Reviewed and organized file; prepared email to Robert Goings to request copy of affidavit from Tarica Worthy; made telephone call to Leland Greeley regarding status of matter.		0.00			
59167 TIME	JGS	1.20	285.00	342.00	342.00
6/30/2017	Review Corres.	0.00	C@1		
Billed G:9025 7/2/2017	Mathes Auto Sal	0.00			
Reviewed email from Robert Goings and responded to same; resumed review of file.		0.00			
<u>Total: 6/30/2017</u>					
	Billable	4.80		1368.00	1368.00
	Unbillable	0.00		0.00	
	Total	4.80		1368.00	
<u>Transaction Date: 7/3/2017</u>					
59177 TIME	JGS	3.70	285.00	1054.50	1054.50
7/3/2017	Phone fr client	0.00	C@1		
Billed G:9062 8/4/2017	Mathes Auto Sal	0.00			
Received telephone call from client (discussed status of case); resumed review of file; received telephone call from Christy Jones (discussed status of title).		0.00			
<u>Total: 7/3/2017</u>					
	Billable	3.70		1054.50	1054.50
	Unbillable	0.00		0.00	
	Total	3.70		1054.50	
<u>Transaction Date: 7/5/2017</u>					
59180 TIME	RGS	0.50	150.00	75.00	75.00
7/5/2017	Review Corres.	0.00	C		
Billed G:9062 8/4/2017	Mathes Auto Sal	0.00			
Reviewed email from JGS regarding theory of liability against Dixon for Otis Morris' conduct; prepared email advising JGS of opinion.		0.00			

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Total: 7/5/2017					
	Billable	0.50		75.00	75.00
	Unbillable	0.00		0.00	
	Total	0.50		75.00	
Transaction Date: 7/6/2017					
59189	TIME	RGS	0.20	150.00	30.00
7/6/2017		Research	0.00	C	30.00
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00		
Researched propriety of assigning a cause of action per JGS.		Morris. Otis	0.00		
59190	TIME	RGS	3.80	150.00	570.00
7/6/2017		Research	0.00	C	570.00
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00		
Resumed researching propriety of assigning a cause of action, possibility of making Tarica Worthy a plaintiff and receiving proceeds of her judgment; drafted extensive email to JGS summarizing research.		Morris. Otis	0.00		
59193	TIME	JGS	0.80	285.00	228.00
7/6/2017		Phone to client	0.00	C@1	228.00
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00		
Made telephone call to client regarding proposed assignment from Worthy (authorized me to contact her); prepared email to Tarica Worthy concerning assignment.		Morris. Otis	0.00		
59195	TIME	JGS	3.30	285.00	940.50
7/6/2017		Review Corres.	0.00	C@1	940.50
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00		
Reviewed email from client; resumed review of file and preparation of Pre-trial Brief; prepared discovery requests to Ron Stanley and Leland Greeley.		Morris. Otis	0.00		
Total: 7/6/2017					
	Billable	8.10		1768.50	1768.50
	Unbillable	0.00		0.00	
	Total	8.10		1768.50	
Transaction Date: 7/7/2017					
59203	TIME	JGS	3.00	285.00	855.00
7/7/2017		Review/Revise	0.00	C@1	855.00
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00		

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Activity	Client	Reference	Units	DNB Time	Est. Time	Variance	Rate	Rate Info	Bill Status	Slip Value	Billed SV	Adjustment	Markup
			Reviewed and revised draft of Pre-trial Brief, reviewed and revised correspondence to Phil Porter.				Morris. Otis				0.00							
59206	TIME			JGS				0.10				285.00			28.50		28.50	
	7/7/2017				Review/Execute			0.00					C@1					
	Billed	G:9062	8/4/2017		Mathes Auto Sal			0.00										
			Reviewed and executed correspondence to Phil Porter.				Morris. Otis	0.00										
59205	TIME			JGS				0.10				285.00			28.50		28.50	
	7/7/2017				Review document			0.00					C@1					
	Billed	G:9062	8/4/2017		Mathes Auto Sal			0.00										
			Reviewed memo regarding assignability prepared by associate.				Morris. Otis	0.00										
59202	TIME			JGS				0.10				285.00			28.50		0.00	
	7/7/2017				Return call			0.10					C@1					
	Billed	G:9062	8/4/2017		Mathes Auto Sal			0.00					No Charge					
			Returned telephone call to Tarica Worthy (not available; left message on voice mail).				Morris. Otis	0.00										
59201	TIME			JGS				4.80				285.00			1368.00		1368.00	
	7/7/2017				Review/Revise			0.00					C@1					
	Billed	G:9062	8/4/2017		Mathes Auto Sal			0.00										
			Reviewed and revised interrogatories and requests to produce; prepared correspondence to Ron Stanley and Leland Greeley to serve copies of same; resumed preparation of Pre-trial Brief; prepared email to Tarica Worthy; prepared correspondence to Phil Porter with title documents.				Morris. Otis	0.00										
59199	TIME			RGS				1.50				150.00			225.00		225.00	
	7/7/2017				Review document			0.00					C					
	Billed	G:9062	8/4/2017		Mathes Auto Sal			0.00										
			Reviewed <u>Charleston Lincoln Mercury v. Ferguson</u> in light of previous research; drafted follow-up memo and emailed to JGS.				Morris. Otis	0.00										
Total: 7/7/2017																		
				Billable				9.50							2505.00		2505.00	
				Unbillable				0.10							28.50			
				Total				9.60							2533.50			

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Transaction Date: 7/10/2017								
59209	TIME			JGS	2.30	285.00	655.50	655.50
	7/10/2017			Travel	0.00	C@1		
	Billed	G:9062	8/4/2017	Mathes Auto Sal	0.00			
Traveled to and from Richland County Judicial Center, attended roster meeting and status conference.				Morris. Otis	0.00			
59210	TIME			JGS	1.60	285.00	456.00	456.00
	7/10/2017			Review/Revise	0.00	C@1		
	Billed	G:9062	8/4/2017	Mathes Auto Sal	0.00			
Reviewed and revised correspondence to Bank of America; made telephone call to client (discussed status of case); reviewed Order of Dismissal of NextGear and Manheim emailed by Paul Gunter; prepared proposed Order per Judge Manning's request; prepared subpoena to Auction Access; prepared subpoena to State Credit Union.				Morris. Otis	0.00			
59212	TIME			JGS	0.10	285.00	28.50	0.00
	7/10/2017			Review Corres.	0.10	C@1		
	Billed	G:9062	8/4/2017	Mathes Auto Sal	0.00	No Charge		
Reviewed email from Robert Goings and responded to same.				Morris. Otis	0.00			
59213	TIME			JGS	0.20	285.00	57.00	57.00
	7/10/2017			Review/Execute	0.00	C@1		
	Billed	G:9062	8/4/2017	Mathes Auto Sal	0.00			
Reviewed and executed correspondence to Judge Manning with proposed Order; reviewed and executed correspondence and subpoena to Auction Access.				Morris. Otis	0.00			
59215	TIME			JGS	0.20	285.00	57.00	57.00
	7/10/2017			Review Corres.	0.00	C@1		
	Billed	G:9062	8/4/2017	Mathes Auto Sal	0.00			
Reviewed email from Robert Goings and responded to same.				Morris. Otis	0.00			
Total: 7/10/2017								
					Billable	4.30	1225.50	1225.50
					Unbillable	0.10	28.50	
					Total	4.40	1254.00	

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Activity	Client	Reference	Units	DNB Time	Est. Time	Variance	Rate	Rate Info	Bill Status	Slip Value	Billed SV	Adjustment	Markup
<u>Transaction Date: 7/11/2017</u>																		
59220	TIME			JGS				0.10				285.00			28.50	28.50		
	7/11/2017				Review/Execute			0.00				C@1						
	Billed	G:9062	8/4/2017	Mathes Auto Sal				0.00										
	Reviewed and executed correspondence and subpoena to S.C. State Federal Credit Union; issued check to Postmaster.			Morris. Otis				0.00										
59221	EXP			JGS				1				34.62			34.62	34.62		
	7/11/2017				Certified Mail													
	Billed	G:9062	8/4/2017	Mathes Auto Sal														
	\$34.62 paid to Postmaster for service of subpoenas by certified mail.			Morris. Otis														
<u>Total: 7/11/2017</u>																		
				Billable				0.10							63.12	63.12		
				Unbillable				0.00							0.00			
				Total				0.10							63.12			
<u>Transaction Date: 7/17/2017</u>																		
59260	TIME			JGS				0.20				285.00			57.00	0.00		
	7/17/2017				Return call			0.20				C@1						
	Billed	G:9062	8/4/2017	Mathes Auto Sal				0.00				No Charge						
	Returned telephone call to client (discussed status of case).			Morris. Otis				0.00										
59261	TIME			JGS				0.20				285.00			57.00	57.00		
	7/17/2017				Review Corres.			0.00				C@1						
	Billed	G:9062	8/4/2017	Mathes Auto Sal				0.00										
	Reviewed correspondence from Phil Porter with Florida title documents; prepared email to Christy Jones regarding status of title.			Morris. Otis				0.00										
59263	TIME			JGS				0.30				285.00			85.50	85.50		
	7/17/2017				Review Corres.			0.00				C@1						
	Billed	G:9062	8/4/2017	Mathes Auto Sal				0.00										
	Reviewed email from Christy Jones requesting title documents and responded to same; prepared correspondence to Christy Jones with same.			Morris. Otis				0.00										
59266	TIME			JGS				0.20				285.00			57.00	0.00		
	7/17/2017				Travel			0.20				C@1						
	Billed	G:9062	8/4/2017	Mathes Auto Sal				0.00				No Charge						
	Traveled to and from another client's home in nearby area.			Morris. Otis				0.00										

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 7/17/2017					
	Billable	0.50		142.50	142.50
	Unbillable	0.40		114.00	
	Total	0.90		256.50	
Transaction Date: 7/18/2017					
59275 EXP	JGS	1	6.00	6.00	6.00
7/18/2017	Misc.				
Billed G:9062	8/4/2017 Mathes Auto Sal				
\$6.00 paid to SCDMV.	Morris. Otis				
59274 TIME	JGS	0.30	285.00	85.50	85.50
7/18/2017	Review File	0.00	C@1		
Billed G:9062	8/4/2017 Mathes Auto Sal	0.00			
Reviewed and organized file; prepared Request	Morris. Otis	0.00			
For Dealer License Information on Pro Bowl per client's request.					
59272 TIME	JGS	0.10	285.00	28.50	28.50
7/18/2017	Prepared letter	0.00	C@1		
Billed G:9062	8/4/2017 Mathes Auto Sal	0.00			
Prepared email to Leland Greeley concerning deposition of Michael Moore and 30(b)(6) deposition of Dixon's Automotive.	Morris. Otis	0.00			
59270 TIME	JGS	0.30	285.00	85.50	85.50
7/18/2017	Review Corres.	0.00	C@1		
Billed G:9062	8/4/2017 Mathes Auto Sal	0.00			
Reviewed email from client regarding Sunshine Group, et al; made telephone call to client (discussed deposition of a witness from the auction who can describe the process from A-Z concerning log in numbers, etc. and deposition of Michael Moore to determine if we can also reach Gerald Dixon).	Morris. Otis	0.00			
Total: 7/18/2017					
	Billable	0.70		205.50	205.50
	Unbillable	0.00		0.00	
	Total	0.70		205.50	
Transaction Date: 7/25/2017					
59303 TIME	JGS	0.10	285.00	28.50	28.50
7/25/2017	Review File	0.00	C@1		
Billed G:9062	8/4/2017 Mathes Auto Sal	0.00			
Reviewed file; returned telephone call to Jacob	Morris. Otis	0.00			

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status	Description	Activity	DNB Time	Rate Info		Adjustment
		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
	at Auction Access (addressed his questions about subpoena).					
59305	TIME	JGS	0.10	285.00	28.50	28.50
7/25/2017		Phone fr client	0.00	C@1		
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00			
	Received telephone call from Jacob at Auction Access (discussed connection between Dixon and Moore and Pro Bowl).					
		Morris. Otis	0.00			
Total: 7/25/2017						
		Billable	0.20		57.00	57.00
		Unbillable	0.00		0.00	
		Total	0.20		57.00	
<u>Transaction Date: 7/26/2017</u>						
59321	TIME	JGS	0.40	285.00	114.00	114.00
7/26/2017		Review File	0.00	C@1		
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00			
	Reviewed file; prepared email to Judge Manning's clerk concerning status of Order; prepared email to Leland Greeley regarding scheduling deposition.					
		Morris. Otis	0.00			
59323	TIME	JGS	0.20	285.00	57.00	57.00
7/26/2017		Phone fr client	0.00	C@1		
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00			
	Received telephone call from Jacob Fleming at Auction Access regarding subpoena (will email documents to me); reviewed email from client concerning status of case; reviewed email from Christy Jones with copy of credit union's check; reviewed email from Leland Greeley concerning scheduling depositions.					
		Morris. Otis	0.00			
59328	TIME	JGS	0.30	285.00	85.50	85.50
7/26/2017		Review Corres.	0.00	C@1		
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00			
	Reviewed email from Jacob Fleming at Auction Access with attachments; prepared email to Jacob Fleming to request copies by mail.					
		Morris. Otis	0.00			
59329	TIME	JGS	0.10	285.00	28.50	0.00
7/26/2017		Review Corres.	0.10	C@1		
Billed	G:9062	8/4/2017 Mathes Auto Sal	0.00	No Charge		
	Reviewed correspondence from SCDMV with copies of bond information.					
		Morris. Otis	0.00			

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 7/26/2017					
	Billable	0.90		256.50	256.50
	Unbillable	0.10		28.50	
	Total	1.00		285.00	
Transaction Date: 7/27/2017					
59337 TIME	JGS	0.10	285.00	28.50	28.50
7/27/2017	Review Corres.	0.00	C@1		
Billed G:9062 8/4/2017	Mathes Auto Sal	0.00			
Reviewed email from Scott Pierce regarding	Morris. Otis	0.00			
status of proposed Order and replied to same;					
reviewed email from client concerning DLA-1.					
59340 TIME	JGS	0.50	285.00	142.50	142.50
7/27/2017	Return call	0.00	C@1		
Billed G:9062 8/4/2017	Mathes Auto Sal	0.00			
Returned telephone call to client concerning	Morris. Otis	0.00			
status of case; traveled to and from Clerk of					
Court's office to search for Order submitted to					
Judge Manning.					
59342 TIME	JGS	1.10	285.00	313.50	313.50
7/27/2017	Review File	0.00	C@1		
Billed G:9062 8/4/2017	Mathes Auto Sal	0.00			
Reviewed file; prepared 2nd DLA-11 for Pro Bow/Morris. Otis		0.00			
Motors, Inc.; reviewed and organized file;					
reviewed and executed correspondence for					
service of Order; prepared correspondence and					
subpoena to South State Bank.					
59343 EXP	JGS	1	6.00	6.00	6.00
7/27/2017	Misc.				
Billed G:9062 8/4/2017	Mathes Auto Sal				
\$6.00 paid to SCDMV.	Morris. Otis				
59348 TIME	JGS	0.10	285.00	28.50	28.50
7/27/2017	Review/Revise	0.00	C@1		
Billed G:9062 8/4/2017	Mathes Auto Sal	0.00			
Reviewed and revised correspondence and	Morris. Otis	0.00			
subpoena to South State Bank.					
Total: 7/27/2017					
	Billable	1.80		519.00	519.00
	Unbillable	0.00		0.00	
	Total	1.80		519.00	

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
<u>Transaction Date: 7/28/2017</u>					
59357 EXP 7/28/2017 Billed G:9062 8/4/2017 \$4.75 paid to Postmaster for certified mail (subpoena to South State Bank).	JGS Certified Mail Mathes Auto Sal Morris. Otis	1	4.75	4.75	4.75
Total: 7/28/2017	Billable	0.00		4.75	4.75
	Unbillable	0.00		0.00	
	Total	0.00		4.75	
<u>Transaction Date: 7/31/2017</u>					
59397 TIME 7/31/2017 Billed G:9062 8/4/2017 Reviewed documents produced by Auto Tec, LLC/Auction Access pursuant to subpoena.	JGS Review document Mathes Auto Sal Morris. Otis	0.50 0.00 0.00 0.00	285.00 C@1	142.50	142.50
59388 TIME 7/31/2017 Billed G:9062 8/4/2017 Reviewed correspondence from Bank of America in response to subpoena for front and back of Tarica Worthy's check.	JGS Review Corres. Mathes Auto Sal Morris. Otis	0.10 0.00 0.00 0.00	285.00 C@1	28.50	28.50
Total: 7/31/2017	Billable	0.60		171.00	171.00
	Unbillable	0.00		0.00	
	Total	0.60		171.00	
<u>Transaction Date: 8/1/2017</u>					
59402 TIME 8/1/2017 Billed G:9092 9/4/2017 Prepared email to Leland Greeley regarding noticing depositions; reviewed email from client concerning Representative Authorization Letter for Otis Morris by Dixon Automotive; reviewed York County Bar listing; made telephone call to Joe Raad to arrange to use his conference room; prepared email to Joe Raad regarding potential dates.	JGS Prepared letter Mathes Auto Sal Morris. Otis	0.50 0.00 0.00 0.00	285.00 C@1	142.50	142.50

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
59404	TIME	JGS	0.40	285.00	114.00	114.00
8/1/2017		Phone fr client	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Received telephone call from client regarding status of case; received telephone call from Joe Raad; prepared Notices of Deposition for Michael T. Moore, Gerald Scott Dixon, and Dixon's Automotive, LLC and cover letter to Leland B. Greeley, Esq. to serve with copies of same.		Morris. Otis	0.00			
59407	TIME	JGS	0.60	285.00	171.00	171.00
8/1/2017		Review/Revise	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed and revised correspondence and notices of deposition; reviewed email from client concerning scheduling depositions and responded to same.		Morris. Otis	0.00			
59410	TIME	JGS	0.10	285.00	28.50	28.50
8/1/2017		Review/Execute	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed and executed correspondence and notices of deposition.		Morris. Otis	0.00			
Total: 8/1/2017						
		Billable	1.60		456.00	456.00
		Unbillable	0.00		0.00	
		Total	1.60		456.00	
<u>Transaction Date: 8/6/2017</u>						
59448	EXP	JGS	1	24.74	24.74	24.74
8/6/2017		Misc.				
Billed	G:9092	9/4/2017 Mathes Auto Sal				
\$24.74 paid to Bank of America for documents.		Morris. Otis				
59449	EXP	JGS	1	75.00	75.00	75.00
8/6/2017		Misc.				
Billed	G:9092	9/4/2017 Mathes Auto Sal				
\$75.00 paid to Auction ACCESS for documents.		Morris. Otis				
Total: 8/6/2017						
		Billable	0.00		99.74	99.74
		Unbillable	0.00		0.00	
		Total	0.00		99.74	

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Slip ID		Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
<u>Transaction Date: 8/14/2017</u>						
59452	TIME	JGS	0.10	285.00	28.50	28.50
8/14/2017		Return call	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Returned telephone call to Janice Pitts at SouthMorris. Otis						
State Bank (not available; left message on voice						
mail); returned telephone call to Robert Sword						
(not available; left message on voice mail).						
59455	TIME	JGS	0.20	285.00	57.00	57.00
8/14/2017		Review Corres.	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed correspondence from Ron Stanley						
regarding discovery responses and replied by						
email.						
Total: 8/14/2017		Billable	0.30		85.50	85.50
		Unbillable	0.00		0.00	
		Total	0.30		85.50	
<u>Transaction Date: 8/16/2017</u>						
59486	TIME	JGS	0.20	285.00	57.00	57.00
8/16/2017		Review File	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed file; prepared for depositions.						
59488	TIME	JGS	3.40	285.00	969.00	969.00
8/16/2017		Phone to client	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Made telephone call to John Mathes (not						
available; left message on voice mail); resumed						
review of file and preparation for depositions of						
Dixon and Moore; made telephone call to						
Leland Greeley regarding status of discovery						
responses (not available; left message with						
Andrea).						
Total: 8/16/2017		Billable	3.60		1026.00	1026.00
		Unbillable	0.00		0.00	
		Total	3.60		1026.00	
<u>Transaction Date: 8/17/2017</u>						
59491	TIME	JGS	6.50	285.00	1852.50	1852.50
8/17/2017		Review document	0.00	C@1		

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Billed	G:9092	9/4/2017	Mathes Auto Sal		0.00			
			Reviewed Complaint and Exhibits; traveled to and from Rock Hill, S.C.; attended depositions.	Morris. Otis	0.00			
Total: 8/17/2017								
			Billable		6.50		1852.50	1852.50
			Unbillable		0.00		0.00	
			Total		6.50		1852.50	
<u>Transaction Date: 8/18/2017</u>								
59493	TIME		JGS		0.60	285.00	171.00	171.00
	8/18/2017		Prepared letter		0.00	C@1		
Billed	G:9092	9/4/2017	Mathes Auto Sal		0.00			
			Prepared email to client regarding results of depositions.	Morris. Otis	0.00			
Total: 8/18/2017								
			Billable		0.60		171.00	171.00
			Unbillable		0.00		0.00	
			Total		0.60		171.00	
<u>Transaction Date: 8/20/2017</u>								
59501	TIME		JGS		0.10	285.00	28.50	28.50
	8/20/2017		Review Corres.		0.00	C@1		
Billed	G:9092	9/4/2017	Mathes Auto Sal		0.00			
			Reviewed correspondence from SCDMV with copy of ProBowl's Application For A Dealer Or Wholesaler License; prepared email to client regarding same.	Morris. Otis	0.00			
Total: 8/20/2017								
			Billable		0.10		28.50	28.50
			Unbillable		0.00		0.00	
			Total		0.10		28.50	
<u>Transaction Date: 8/27/2017</u>								
59585	EXP		JGS		1	57.00	57.00	57.00
	8/27/2017		Photocopies					
Billed	G:9092	9/4/2017	Mathes Auto Sal					
			\$57.00 paid to South State Bank for copies.	Morris. Otis				
Total: 8/27/2017								
			Billable		0.00		57.00	57.00

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	0.00		57.00	

Transaction Date: 8/30/2017

59624	TIME	JGS	0.10	285.00	28.50	28.50
8/30/2017		Review Corres.	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed email from client regarding location for Morris. Otis deposition; reviewed Rule 30(a)(2), SCRCP and replied to same.			0.00			

59618	TIME	JGS	0.10	285.00	28.50	28.50
8/30/2017		Review Corres.	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed email from Ron Stanley and replied to Morris. Otis same.			0.00			

Total: 8/30/2017

Billable	0.20	57.00	57.00
Unbillable	0.00	0.00	
Total	0.20	57.00	

Transaction Date: 8/31/2017

59636	TIME	JGS	0.10	285.00	28.50	28.50
8/31/2017		Review Corres.	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed email from client regarding Michael Moore's deposition and responded to same.			0.00			

59633	TIME	JGS	0.30	285.00	85.50	85.50
8/31/2017		Review Corres.	0.00	C@1		
Billed	G:9092	9/4/2017 Mathes Auto Sal	0.00			
Reviewed email from client; made telephone call to John Mathes to discuss status of case and scheduling his deposition; prepared email to Ron Stanley regarding same.			0.00			

Total: 8/31/2017

Billable	0.40	114.00	114.00
Unbillable	0.00	0.00	
Total	0.40	114.00	

Transaction Date: 9/3/2017

59659	TIME	JGS	0.10	285.00	28.50	28.50
9/3/2017		Review Corres.	0.00	C@1		
Billed	G:9119	10/3/2017 Mathes Auto Sal	0.00			

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Reviewed copies of correspondence and motion to compel from Ron Stanley.	Morris. Otis	0.00			
Total: 9/3/2017					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
<u>Transaction Date: 9/7/2017</u>					
59675	EXP	JGS	1	1052.04	1052.04
9/7/2017	Depo. Cost				
Billed	G:9119	10/3/2017			
\$1052.04 paid to Southern Reporting, Inc. for Morris. Otis depositions of Gerald Dixon and Michael Moore.					
59686	TIME	JGS	0.10	285.00	28.50
9/7/2017	Review Corres.				
Billed	G:9119	10/3/2017		C@1	
Reviewed email from Ron Stanley concerning scheduling client's deposition and responded to same; prepared email to client regarding same.					
	Morris. Otis	0.00			
Total: 9/7/2017					
	Billable	0.10		1080.54	1080.54
	Unbillable	0.00		0.00	
	Total	0.10		1080.54	
<u>Transaction Date: 9/8/2017</u>					
59694	TIME	JGS	2.70	285.00	769.50
9/8/2017	Review document				
Billed	G:9119	10/3/2017		C@1	
Reviewed deposition of Gerald Dixon; reviewed deposition of Michael Moore; prepared email to client regarding same.					
	Morris. Otis	0.00			
Total: 9/8/2017					
	Billable	2.70		769.50	769.50
	Unbillable	0.00		0.00	
	Total	2.70		769.50	
<u>Transaction Date: 9/11/2017</u>					
59700	TIME	JGS	0.10	285.00	0.00
9/11/2017	Review Corres.				
Billed	G:9119	10/3/2017		C@1	
Reviewed email from Leland Greeley regarding Morris. Otis					
	Morris. Otis	0.00	No Charge		

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
			availability for client's deposition.						
Total: 9/11/2017									
				Billable		0.00		0.00	0.00
				Unbillable		0.10		28.50	
				Total		0.10		28.50	
Transaction Date: 9/14/2017									
59739	TIME			JGS		0.10	285.00	28.50	28.50
9/14/2017				Review Corres.		0.00	C@1		
Billed	G:9119	10/3/2017		Mathes Auto Sal		0.00			
Reviewed email from Ron Stanley regarding scheduling Plaintiff's deposition and responded to same.									
				Morris. Otis		0.00			
59752	TIME			JGS		0.20	285.00	57.00	57.00
9/14/2017				Return call		0.00	C@1		
Billed	G:9119	10/3/2017		Mathes Auto Sal		0.00			
Returned telephone call to John Mathes (discussed scheduling deposition for 9/27/17; also discussed article regarding preparation for deposition).									
				Morris. Otis		0.00			
Total: 9/14/2017									
				Billable		0.30		85.50	85.50
				Unbillable		0.00		0.00	
				Total		0.30		85.50	
Transaction Date: 9/20/2017									
59795	TIME			JGS		0.10	285.00	28.50	28.50
9/20/2017				Review Corres.		0.00	C@1		
Billed	G:9119	10/3/2017		Mathes Auto Sal		0.00			
Reviewed email from client and replied concerning discovery responses.									
				Morris. Otis		0.00			
Total: 9/20/2017									
				Billable		0.10		28.50	28.50
				Unbillable		0.00		0.00	
				Total		0.10		28.50	
Transaction Date: 9/21/2017									
59813	TIME			JGS		1.60	285.00	456.00	456.00
9/21/2017				Prepare documen		0.00	C@1		
Billed	G:9119	10/3/2017		Mathes Auto Sal		0.00			
Resumed preparation of discovery responses;									
				Morris. Otis		0.00			

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
			made telephone call to Don Deese regarding listing him as a witness; made telephone call to Paul Hoefer (not available; left message on voice mail).					
Total: 9/21/2017								
				Billable	1.60		456.00	456.00
				Unbillable	0.00		0.00	
				Total	1.60		456.00	
Transaction Date: 9/22/2017								
59827	TIME			JGS	0.70	285.00	199.50	199.50
9/22/2017				Review File	0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal		0.00			
Reviewed file; reviewed responses to subpoenas Morris. Otis to South State Bank and Bank of America; made telephone call to client to discuss preparation for deposition.					0.00			
59831	TIME			JGS	0.10	285.00	28.50	28.50
9/22/2017				Phone fr client	0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal		0.00			
Received telephone call from client regarding discovery of wire transfers to Greg Bryant for \$56,000 each.					0.00			
59820	TIME			JGS	0.70	285.00	199.50	199.50
9/22/2017				Review/Revise	0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal		0.00			
Reviewed and revised discovery responses; prepared correspondence to Ron Stanley with same; received telephone call from Paul Hoefer concerning status of his case against Otis Morris and ProBowl.					0.00			
59824	TIME			JGS	0.10	285.00	28.50	28.50
9/22/2017				Review/Execute	0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal		0.00			
Reviewed and executed correspondence and discovery responses.					0.00			
Total: 9/22/2017								
				Billable	1.60		456.00	456.00
				Unbillable	0.00		0.00	
				Total	1.60		456.00	

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Transaction Date: 9/26/2017									
59848	TIME			JGS		0.10	285.00	28.50	28.50
	9/26/2017			Review Corres.		0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal			0.00			
	Reviewed emails from client regarding David Hall's review of Otis' banking records and replied to same.			Morris. Otis		0.00			
59854	TIME			JGS		2.10	285.00	598.50	598.50
	9/26/2017			Review File		0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal			0.00			
	Reviewed file; prepared for client's deposition.			Morris. Otis		0.00			
Total: 9/26/2017									
				Billable		2.20		627.00	627.00
				Unbillable		0.00		0.00	
				Total		2.20		627.00	
Transaction Date: 9/27/2017									
59858	TIME			JGS		1.30	285.00	370.50	370.50
	9/27/2017			Conference		0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal			0.00			
	Office conference with client; made telephone call to Ron Stanley regarding confusion over start time.			Morris. Otis		0.00			
59861	TIME			JGS		2.30	285.00	655.50	655.50
	9/27/2017			Travel		0.00	C@1		
Billed	G:9119	10/3/2017	Mathes Auto Sal			0.00			
	Traveled to and from Ron Stanley's office; participated in client's deposition.			Morris. Otis		0.00			
Total: 9/27/2017									
				Billable		3.60		1026.00	1026.00
				Unbillable		0.00		0.00	
				Total		3.60		1026.00	
Transaction Date: 10/2/2017									
59885	TIME			JGS		0.10	285.00	28.50	28.50
	10/2/2017			Prepared letter		0.00	C@1		
Billed	G:9148	11/3/2017	Mathes Auto Sal			0.00			
	Prepared email to Ron Stanley regarding roster meeting next week and request for protection.			Morris. Otis		0.00			

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status	Description	Activity	DNB Time	Rate Info		Adjustment
		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
59898	TIME	JGS	0.70	285.00	199.50	199.50
10/2/2017		Review Corres.	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
	Reviewed correspondence from Ben McCoy with Morris. Otis		0.00			
	Mediation Agreement; prepared email to Kylie Keesley regarding Leland Greeley's participation; received telephone call from Ron Stanley concerning status of matter.					
Total: 10/2/2017						
		Billable	0.80		228.00	228.00
		Unbillable	0.00		0.00	
		Total	0.80		228.00	
Transaction Date: 10/3/2017						
59915	TIME	JGS	0.10	285.00	28.50	28.50
10/3/2017		Review Corres.	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
	Reviewed copy of email from Ron Stanley to Kylie Keesley regarding "cancelled" mediation; reviewed copy of correspondence from Ron Stanley to Judge Manning faxed by Earnestine Austin.	Morris. Otis	0.00			
59910	TIME	JGS	0.10	285.00	28.50	28.50
10/3/2017		Review Corres.	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
	Reviewed email from Leland Greeley; reviewed copy of email from Earnestine Austin regarding letter to Judge Manning; reviewed emails from client regarding expectations for mediation; reviewed email from Kylie Keesley concerning "postponement" of mediation; prepared email to Earnestine Austin regarding missing attachment.	Morris. Otis	0.00			
Total: 10/3/2017						
		Billable	0.20		57.00	57.00
		Unbillable	0.00		0.00	
		Total	0.20		57.00	
Transaction Date: 10/9/2017						
59967	TIME	JGS	1.30	285.00	370.50	370.50
10/9/2017		Travel	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
	Traveled to and from Richland County Judicial Center; attended roster meeting.	Morris. Otis	0.00			

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 10/9/2017					
	Billable	1.30		370.50	370.50
	Unbillable	0.00		0.00	
	Total	1.30		370.50	
Transaction Date: 10/10/2017					
59980	TIME				
10/10/2017	JGS	0.30	285.00	85.50	85.50
Billed	Return call	0.00	C@1		
11/3/2017	Mathes Auto Sal	0.00			
Returned telephone call to client (discussed status of case and what to expect at mediation).					
	Morris. Otis	0.00			
Total: 10/10/2017					
	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	
Transaction Date: 10/12/2017					
60010	TIME				
10/12/2017	JGS	0.20	285.00	57.00	57.00
Billed	Review Corres.	0.00	C@1		
11/3/2017	Mathes Auto Sal	0.00			
Reviewed correspondence from Jim Lybrand with Agreement To Mediate And Confidentiality Agreement; reviewed draft of Pre-trial Brief.					
	Morris. Otis	0.00			
Total: 10/12/2017					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 10/17/2017					
60048	TIME				
10/17/2017	JGS	0.30	285.00	85.50	85.50
Billed	Review Corres.	0.00	C@1		
11/3/2017	Mathes Auto Sal	0.00			
Reviewed email from client regarding having read his deposition; made telephone call to client to discuss how NextGear charged his floor plan for car Otis purchased from Manheim.					
	Morris. Otis	0.00			
Total: 10/17/2017					
	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Activity	Client Reference	Units	DNB Time	Rate	Slip Value	Billed SV
							Est. Time	Est. Time	Rate Info		Adjustment
							Variance		Bill Status		Markup
<u>Transaction Date: 10/19/2017</u>											
60093	TIME			JGS			0.70		285.00	199.50	199.50
	10/19/2017				Prepared letter		0.00		C@1		
Billed	G:9148	11/3/2017		Mathes Auto Sal			0.00				
			Prepared correspondence to Jim Lybrand for mediation.	Morris. Otis			0.00				
Total: 10/19/2017											
				Billable			0.70			199.50	199.50
				Unbillable			0.00			0.00	
				Total			0.70			199.50	
<u>Transaction Date: 10/20/2017</u>											
60098	TIME			JGS			1.60		285.00	456.00	456.00
	10/20/2017				Prepared letter		0.00		C@1		
Billed	G:9148	11/3/2017		Mathes Auto Sal			0.00				
			Resumed preparation of letter to mediator.	Morris. Otis			0.00				
60101	TIME			JGS			0.30		285.00	85.50	85.50
	10/20/2017				Review/Execute		0.00		C@1		
Billed	G:9148	11/3/2017		Mathes Auto Sal			0.00				
			Reviewed and executed correspondence to mediator; received telephone call from John Mathes and discussed briefly.	Morris. Otis			0.00				
Total: 10/20/2017											
				Billable			1.90			541.50	541.50
				Unbillable			0.00			0.00	
				Total			1.90			541.50	
<u>Transaction Date: 10/24/2017</u>											
60129	TIME			JGS			3.00		285.00	855.00	855.00
	10/24/2017				Review document		0.00		C@1		
Billed	G:9148	11/3/2017		Mathes Auto Sal			0.00				
			Reviewed depositions of Morris, Dixon, Moore, and client and prepared for mediation.	Morris. Otis			0.00				
Total: 10/24/2017											
				Billable			3.00			855.00	855.00
				Unbillable			0.00			0.00	
				Total			3.00			855.00	
<u>Transaction Date: 10/25/2017</u>											
60138	TIME			JGS			4.00		285.00	1140.00	1140.00
	10/25/2017				Conference		0.00		C@1		

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Slip ID			Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time			Activity	DNB Time	Rate Info		Adjustment
Posting Status			Client	Est. Time	Bill Status		Markup
Description			Reference	Variance			
Billed	G:9148	11/3/2017	Mathes Auto Sal	0.00			
Office conference with client to prepare for mediation conference; attended mediation conference.			Morris. Otis	0.00			
60134	TIME		JGS	1.30	285.00	370.50	370.50
10/25/2017			Review File	0.00	C@1		
Billed	G:9148	11/3/2017	Mathes Auto Sal	0.00			
Resumed review of file and preparation for mediation conference.			Morris. Otis	0.00			
Total: 10/25/2017							
			Billable	5.30		1510.50	1510.50
			Unbillable	0.00		0.00	
			Total	5.30		1510.50	
<u>Transaction Date: 10/26/2017</u>							
60142	TIME		JGS	0.30	285.00	85.50	85.50
10/26/2017			Phone to client	0.00	C@1		
Billed	G:9148	11/3/2017	Mathes Auto Sal	0.00			
Made telephone call to client regarding proceeding with bench trial; reviewed email from client; prepared email to opposing counsel regarding same.			Morris. Otis	0.00			
60143	TIME		JGS	0.70	285.00	199.50	199.50
10/26/2017			Review document	0.00	C@1		
Billed	G:9148	11/3/2017	Mathes Auto Sal	0.00			
Reviewed Rule 45; reviewed and revised Pre-trial Brief; prepared subpoena and correspondence to Tarica Worthy; reviewed emails from client and Leland Greeley; reviewed and revised subpoena.			Morris. Otis	0.00			
60146	TIME		JGS	0.10	285.00	28.50	28.50
10/26/2017			Review/Execute	0.00	C@1		
Billed	G:9148	11/3/2017	Mathes Auto Sal	0.00			
Reviewed and executed correspondence and subpoena to Tarica Worthy.			Morris. Otis	0.00			
60148	TIME		JGS	0.50	285.00	142.50	142.50
10/26/2017			Review Corres.	0.00	C@1		
Billed	G:9148	11/3/2017	Mathes Auto Sal	0.00			
Reviewed emails from Ron Stanley and Leland Greeley concerning referring case to Master; made telephone call to client to discuss; responded to emails with copies to Judge			Morris. Otis	0.00			

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	Posting Status	Activity	DNB Time	Rate Info		Adjustment
	Description	Client	Est. Time	Bill Status		Markup
		Reference	Variance			
	Manning and his clerk; made telephone call to Judge Strickland to determine his availability (not available; left message on voice mail).					
60157	TIME	JGS	0.30	285.00	85.50	85.50
10/26/2017		Phone to client	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
Made telephone call to Judge Strickland's office (spoke with John Scott concerning referring matter to him; suggested that I send him an email); prepared correspondence to Judge Strickland.			0.00			
Total: 10/26/2017						
		Billable	1.90		541.50	541.50
		Unbillable	0.00		0.00	
		Total	1.90		541.50	
Transaction Date: 10/27/2017						
60160	TIME	JGS	0.10	285.00	28.50	28.50
10/27/2017		Phone fr client	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
Received telephone call from client regarding Lexis/Nexis report on Morris.			0.00			
60161	EXP	JGS	1	203.60	203.60	203.60
10/27/2017		Depo. Cost				
Billed	G:9148	11/3/2017 Mathes Auto Sal				
\$203.60 paid to Garber Reporting Service for copy of client's deposition transcript.						
60162	TIME	JGS	0.20	285.00	57.00	57.00
10/27/2017		Phone fr client	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
Received telephone call from John Scott in Master's office concerning reference and scheduling.			0.00			
60163	TIME	JGS	1.50	285.00	427.50	427.50
10/27/2017		Review document	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
Reviewed forms; reviewed Rule 53, SCRCP; prepared Order of Reference; prepared correspondence to Judge Manning with same; issued checks for filing fee and reference fee; hand-delivered same to Richland County Judicial Center; received telephone call from			0.00			

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Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
services rendered, and copies of correspondence and Mediation Results Report from Jim Lybrand to Clerk of Court.						
Total: 10/31/2017						
		Billable	0.10		343.50	343.50
		Unbillable	0.00		0.00	
		Total	0.10		343.50	
Transaction Date: 11/6/2017						
60226	TIME	JGS	0.20	285.00	57.00	57.00
11/6/2017		Phone fr client	0.00	C@1		
Billed	G:9182 12/4/2017	Mathes Auto Sal	0.00			
Received telephone call from John Scott in Master office regarding status of case; received telephone call from John Scott (discussed checks submitted to Judge Manning).						
		Morris. Otis	0.00			
60227	TIME	JGS	0.10	285.00	28.50	0.00
11/6/2017		Phone to client	0.10	C@1		
Billed	G:9182 12/4/2017	Mathes Auto Sal	0.00	No Charge		
Made telephone call to Sabrina in Clerk of Court's office (not available; left message on voice mail).						
		Morris. Otis	0.00			
Total: 11/6/2017						
		Billable	0.20		57.00	57.00
		Unbillable	0.10		28.50	
		Total	0.30		85.50	
Transaction Date: 11/7/2017						
60233	TIME	JGS	0.10	285.00	28.50	0.00
11/7/2017		Phone fr client	0.10	C@1		
Billed	G:9182 12/4/2017	Mathes Auto Sal	0.00	No Charge		
Received telephone call from Sabrina (her records indicate receipt of \$25.00 for filing fee).						
		Morris. Otis	0.00			
Total: 11/7/2017						
		Billable	0.00		0.00	0.00
		Unbillable	0.10		28.50	
		Total	0.10		28.50	
Transaction Date: 11/13/2017						
60277	TIME	JGS	0.10	285.00	28.50	28.50
11/13/2017		Phone to client	0.00	C@1		

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Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
John Scott in Master's office regarding status of matter.						
60164	EXP	JGS	1	25.00	25.00	25.00
10/27/2017		Filing Fee				
Billed	G:9148	11/3/2017 Mathes Auto Sal				
\$25.00 paid to Clerk of Court.						
60165	EXP	JGS	1	50.00	50.00	50.00
10/27/2017		Misc.				
Billed	G:9148	11/3/2017 Mathes Auto Sal				
\$50.00 paid to Master-In-Equity.						
60166	TIME	JGS	1.10	285.00	313.50	313.50
10/27/2017		Phone to client	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
Made telephone call to Judge Manning's chambers (spoke with Ray and confirmed excuse from roster meeting); made telephone call to Tarica Worthy to advise that hearing was rescheduled for January and discussed details with her; made telephone call to client to advise; prepared correspondence to Clerk of Court for filing Affidavit of Compliance regarding service upon Travelers; reviewed Amended Complaint.						
60168	EXP	JGS	1	55.00	55.00	55.00
10/27/2017		Service Fee				
Billed	G:9148	11/3/2017 Mathes Auto Sal				
\$55 paid to Dukes Investigations for service of subpoena upon Tarica Worthy.						
Total: 10/27/2017						
		Billable	2.90		1160.10	1160.10
		Unbillable	0.00		0.00	
		Total	2.90		1160.10	
Transaction Date: 10/31/2017						
60189	EXP	JGS	1	315.00	315.00	315.00
10/31/2017		Misc.				
Billed	G:9148	11/3/2017 Mathes Auto Sal				
\$315.00 paid to Jim Lybrand for mediation fees.						
60188	TIME	JGS	0.10	285.00	28.50	28.50
10/31/2017		Review Corres.	0.00	C@1		
Billed	G:9148	11/3/2017 Mathes Auto Sal	0.00			
Reviewed correspondence, statement for						
		Morris. Otis	0.00			

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Slip ID Dates and Time Posting Status Description status of case).	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 11/16/2017	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	
Transaction Date: 11/28/2017					
60397 TIME	JGS	0.10	285.00	28.50	28.50
11/28/2017	Review Corres.	0.00	C@1		
Billed G:9182 12/4/2017	Mathes Auto Sal	0.00			
Reviewed copies of correspondence to Leland Morris. Otis		0.00			
Greeley with subpoena for Michael Moore; prepared email to Leland Greeley to follow up.					
60403 TIME	JGS	0.50	285.00	142.50	0.00
11/28/2017	Review document	0.50	C@1		
Billed G:9182 12/4/2017	Mathes Auto Sal	0.00	No Charge		
Reviewed 2nd Reminder Invoice from Jim Lybrand; reviewed check register; made telephone call to Wells Fargo to confirm check had cleared; prepared email to Jim Lybrand to advise; reviewed email from Jim Lybrand regarding mistake.	Morris. Otis	0.00			
Total: 11/28/2017	Billable	0.10		28.50	28.50
	Unbillable	0.50		142.50	
	Total	0.60		171.00	
Transaction Date: 12/13/2017					
60571 TIME	JGS	0.80	285.00	228.00	228.00
12/13/2017	Review document	0.00	C@1		
Billed G:9214 1/6/2018	Mathes Auto Sal	0.00			
Reviewed clocked copy of Affidavit of Compliance from Clerk of Court; reviewed Rule 55, SCRCP; prepared Affidavit of Default for Travelers; prepared correspondence to Clerk of Court for filing same; reviewed Rule 5(a), SCRCP and S.C Code Ann. S15-9-270; made telephone call to Tarica Worthy (not available; left message on voice mail); reviewed and revised Acceptance of Service.		0.00			

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	Billed	G:9182	12/4/2017	Mathes Auto Sal	Morris. Otis	0.00			
	Made telephone call to John Scott in Master-In-Equity's office regarding substitute check.					0.00			
60278	EXP			JGS		1	50.00	50.00	50.00
	11/13/2017			Filing Fee					
	Billed	G:9182	12/4/2017	Mathes Auto Sal	Morris. Otis				
	\$50 paid to Master-In-Equity.								
60283	TIME			JGS		0.20	285.00	57.00	57.00
	11/13/2017			Review document		0.00	C@1		
	Billed	G:9182	12/4/2017	Mathes Auto Sal	Morris. Otis	0.00			
	Reviewed scanned notice of hearing from John Scott in Master's office; prepared subpoenas for Tarica Worthy and Michael Moore.					0.00			
Total: 11/13/2017									
				Billable		0.30		135.50	135.50
				Unbillable		0.00		0.00	
				Total		0.30		135.50	
Transaction Date: 11/15/2017									
60309	TIME			JGS		0.60	285.00	171.00	171.00
	11/15/2017			Prepared letter		0.00	C@1		
	Billed	G:9182	12/4/2017	Mathes Auto Sal	Morris. Otis	0.00			
	Prepared email to client regarding status of matter; prepared correspondence to Leland Greeley with subpoena for Michael Moore.					0.00			
60311	TIME			JGS		0.10	285.00	28.50	0.00
	11/15/2017			Review/Execute		0.10	C@1		
	Billed	G:9182	12/4/2017	Mathes Auto Sal	Morris. Otis	0.00	No Charge		
	Reviewed and executed correspondence to Leland Greeley.					0.00			
Total: 11/15/2017									
				Billable		0.60		171.00	171.00
				Unbillable		0.10		28.50	
				Total		0.70		199.50	
Transaction Date: 11/16/2017									
60318	TIME			JGS		0.30	285.00	85.50	85.50
	11/16/2017			Return call		0.00	C@1		
	Billed	G:9182	12/4/2017	Mathes Auto Sal	Morris. Otis	0.00			
	Returned telephone call to client (discussed					0.00			

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
60573	TIME			JGS	0.10	285.00	28.50	28.50
	12/13/2017			Review/Execute	0.00	C@1		
	Billed	G:9214	1/6/2018	Mathes Auto Sal	0.00			
	Reviewed and executed correspondence and Affidavit of Default.				0.00			
Total: 12/13/2017								
				Billable	0.90		256.50	256.50
				Unbillable	0.00		0.00	
				Total	0.90		256.50	
Transaction Date: 12/18/2017								
60602	TIME			JGS	0.20	285.00	57.00	57.00
	12/18/2017			Return call	0.00	C@1		
	Billed	G:9214	1/6/2018	Mathes Auto Sal	0.00			
	Returned telephone call to client regarding status of case.				0.00			
60600	EXP			JGS	1	30.00	30.00	30.00
	12/18/2017			Misc.				
	Billed	G:9214	1/6/2018	Mathes Auto Sal				
	\$30 paid to Tarica Worthy.							
60599	TIME			JGS	1.10	285.00	313.50	313.50
	12/18/2017			Review File	0.00	C@1		
	Billed	G:9214	1/6/2018	Mathes Auto Sal	0.00			
	Reviewed file; prepared email to client regarding status of case; reviewed Rule 55, SCRCP; issued check to Tarica Worthy for witness fee and mileage; reviewed email from Priscilla Jackson dated March 9, 2017.				0.00			
Total: 12/18/2017								
				Billable	1.30		400.50	400.50
				Unbillable	0.00		0.00	
				Total	1.30		400.50	
Transaction Date: 12/20/2017								
60628	TIME			JGS	0.30	285.00	85.50	85.50
	12/20/2017			Phone fr client	0.00	C@1		
	Billed	G:9214	1/6/2018	Mathes Auto Sal	0.00			
	Received telephone call from Tarica Worthy on phone identifying Lindirish Worthy (claims she recently lost \$1500 in a scam and believed call from Heyward Douglas was related to scam); office conference with Henry Dukes (identified				0.00			

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Heyward Douglas as an employee); made telephone call to Tarica Worthy (mailbox full); prepared email to Tarica Worthy to advise that contact by Mr. Douglas had been authorized.					
Total: 12/20/2017					
	Billable	0.30		85.50	85.50
	Unbillable	0.00		0.00	
	Total	0.30		85.50	
Transaction Date: 12/31/2017					
60697	TIME	JGS	0.10	285.00	28.50
12/31/2017		Review document	0.10	C@1	0.00
Billed	G:9214	1/6/2018 Mathes Auto Sal	0.00	No Charge	
Reviewed 3rd Reminder Invoice from McDonald, McKenzie, et al; prepared email to Jim Lybrand regarding same.					
Total: 12/31/2017					
	Billable	0.00		0.00	0.00
	Unbillable	0.10		28.50	
	Total	0.10		28.50	
Transaction Date: 1/1/2018					
60701	TIME	JGS	1.70	285.00	484.50
1/1/2018		Review File	0.00	C@1	
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00		
Reviewed and organized file; prepared motion for judgment by default; prepared email to Ron Stanley and Leland Greeley regarding discovery responses.					
Total: 1/1/2018					
	Billable	1.70		484.50	484.50
	Unbillable	0.00		0.00	
	Total	1.70		484.50	
Transaction Date: 1/2/2018					
60706	TIME	JGS	0.60	285.00	171.00
1/2/2018		Review/Revise	0.00	C@1	
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00		
Reviewed and revised motion for judgment by default; prepared correspondence to Clerk of Court for filing; issued check for filing fee.					

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60707	1/2/2018	EXP		JGS	Filing Fee			1				25.00			25.00	25.00		
	Billed	G:9245	2/1/2018	Mathes Auto Sal														
			\$25.00 paid to Clerk of Court.	Morris. Otis														
60709	1/2/2018	TIME		JGS	Review/Execute			0.10				285.00			28.50	28.50		
	Billed	G:9245	2/1/2018	Mathes Auto Sal				0.00				C@1						
			Reviewed and executed correspondence and motion for judgment by default.	Morris. Otis				0.00										
Total: 1/2/2018				Billable				0.70							224.50	224.50		
				Unbillable				0.00							0.00			
				Total				0.70							224.50			
Transaction Date: 1/3/2018																		
60726	1/3/2018	TIME		JGS	Phone fr client			0.10				285.00			28.50	28.50		
	Billed	G:9245	2/1/2018	Mathes Auto Sal				0.00				C@1						
			Received telephone call from John Scott regarding necessity to schedule hearing on motion for judgment by default (discussed asking Judge Strickland to hear it before hearing on the merits on February 8).	Morris. Otis				0.00										
Total: 1/3/2018				Billable				0.10							28.50	28.50		
				Unbillable				0.00							0.00			
				Total				0.10							28.50			
Transaction Date: 1/5/2018																		
60746	1/5/2018	TIME		JGS	Review document			0.40				285.00			114.00	114.00		
	Billed	G:9245	2/1/2018	Mathes Auto Sal				0.00				C@1						
			Reviewed clocked copies of motion for judgment by default provided by Clerk of Court; reviewed S.C. Code Ann. S15-9-270; prepared correspondence to Director of S.C. Dept. of Ins. as attorney for Travelers for service; issued check for fees.	Morris. Otis				0.00										

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Slip ID		Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
60747	EXP	JGS	1	10.00	10.00	10.00
1/5/2018		Misc.				
Billed	G:9245	2/1/2018 Mathes Auto Sal				
\$10.00 paid to Director, S.C. Dept. of Ins. Morris. Otis						
Total: 1/5/2018						
		Billable	0.40		124.00	124.00
		Unbillable	0.00		0.00	
		Total	0.40		124.00	
Transaction Date: 1/8/2018						
60758	TIME	JGS	0.80	285.00	228.00	228.00
1/8/2018		Review Corres.	0.00	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00			
Reviewed email from Christy Jones (identified Daniel Harms and April Settle as designated witnesses for S.C. State FCU); reviewed Pre-trial Brief and Discovery sub-file. Morris. Otis						
60763	TIME	JGS	0.10	285.00	28.50	28.50
1/8/2018		Review/Execute	0.00	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00			
Reviewed and executed subpoena from Daniel Harms and correspondence to Christy Jones. Morris. Otis						
60764	TIME	JGS	0.30	285.00	85.50	85.50
1/8/2018		Review File	0.00	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00			
Reviewed file; drafted motion to compel discovery. Morris. Otis						
Total: 1/8/2018						
		Billable	1.20		342.00	342.00
		Unbillable	0.00		0.00	
		Total	1.20		342.00	
Transaction Date: 1/10/2018						
60793	TIME	JGS	0.10	285.00	28.50	28.50
1/10/2018		Review Corres.	0.00	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00			
Reviewed correspondence from Steven R. DuBois at S.C. Dept. of Ins. regarding inability to accept service of motion. Morris. Otis						

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Total: 1/10/2018					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Transaction Date: 1/11/2018					
60810 TIME	JGS	0.30	285.00	85.50	85.50
1/11/2018	Phone to client	0.00	C@1		
Billed G:9245 2/1/2018	Mathes Auto Sal	0.00			
Made telephone call to client regarding receipt of report from Henry Dukes concerning registration on Infiniti and lienholder and recommendation to submit another request to SCDMV for title history; reviewed file; prepared Form 5027-A.					
	Morris. Otis	0.00			
60808 EXP	JGS	1	95.00	95.00	95.00
1/11/2018	Misc.				
Billed G:9245 2/1/2018	Mathes Auto Sal				
\$95 paid to Dukes Investigations.					
	Morris. Otis				
60807 TIME	JGS	0.40	285.00	114.00	114.00
1/11/2018	Review document	0.00	C@1		
Billed G:9245 2/1/2018	Mathes Auto Sal	0.00			
Reviewed statement for services rendered, Affidavit of Personal Service, and report from Dukes Investigations; issued check.					
	Morris. Otis	0.00			
Total: 1/11/2018					
	Billable	0.70		294.50	294.50
	Unbillable	0.00		0.00	
	Total	0.70		294.50	
Transaction Date: 1/12/2018					
60817 TIME	JGS	0.20	285.00	57.00	57.00
1/12/2018	Review Corres.	0.00	C@1		
Billed G:9245 2/1/2018	Mathes Auto Sal	0.00			
Reviewed email from Tarica Worthy and forwarded to client; received telephone call from client (discussed status of matter).					
	Morris. Otis	0.00			
Total: 1/12/2018					
	Billable	0.20		57.00	57.00

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Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
		Unbillable	0.00		0.00	
		Total	0.20		57.00	
<u>Transaction Date: 1/15/2018</u>						
60829	TIME	JGS	0.50	285.00	142.50	142.50
1/15/2018		Review Corres.	0.00	C@1		
Billed	G:9245	Mathes Auto Sal	0.00			
	2/1/2018	Morris. Otis	0.00			
Reviewed email from Priscilla Jackson and responded to same; received telephone call from Bill Warnock at Womble Carlyle in Charleston regarding status of case.						
60832	TIME	JGS	0.20	285.00	57.00	57.00
1/15/2018		Review/Revise	0.00	C@1		
Billed	G:9245	Mathes Auto Sal	0.00			
	2/1/2018	Morris. Otis	0.00			
Reviewed and revised correspondence and motion to compel; issued check for filing fee.						
60833	EXP	JGS	1	25.00	25.00	25.00
1/15/2018		Filing Fee				
Billed	G:9245	Mathes Auto Sal				
	2/1/2018	Morris. Otis				
\$25.00 paid to Clerk of Court.						
Total: 1/15/2018						
		Billable	0.70		224.50	224.50
		Unbillable	0.00		0.00	
		Total	0.70		224.50	
<u>Transaction Date: 1/16/2018</u>						
60836	TIME	JGS	0.10	285.00	28.50	28.50
1/16/2018		Phone fr client	0.00	C@1		
Billed	G:9245	Mathes Auto Sal	0.00			
	2/1/2018	Morris. Otis	0.00			
Received telephone call from client (discussed email from Priscilla Jackson and subsequent phone call from Bill Warnock).						
Total: 1/16/2018						
		Billable	0.10		28.50	28.50
		Unbillable	0.00		0.00	
		Total	0.10		28.50	
<u>Transaction Date: 1/23/2018</u>						
60881	TIME	RGS	2.30	150.00	345.00	345.00
1/23/2018		Research	0.00	C		
Billed	G:9245	Mathes Auto Sal	0.00			
	2/1/2018	Morris. Otis	0.00			
Researched rule regarding relief from default,						

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Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
what evidence if any a party who is in default may introduce at trial; drafted email summarizing law to JGS.						
60889	TIME	JGS	0.30	285.00	85.50	85.50
1/23/2018		Return call	0.00	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00			
Returned telephone call to Bill Warnock (discussed status of case and balance of penal sum).		Morris. Otis	0.00			
60895	TIME	JGS	1.90	285.00	541.50	541.50
1/23/2018		Phone to client	0.00	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00			
Made telephone call to client regarding call from Morris. Otis			0.00			
Bill Warnock (discussed need to review case law on extent of Travelers' liability; authorized same); reviewed Amended Complaint and bond cases; prepared correspondence to Bill Warnock regarding notice of hearing.						
Total: 1/23/2018						
		Billable	4.50		972.00	972.00
		Unbillable	0.00		0.00	
		Total	4.50		972.00	
Transaction Date: 1/24/2018						
60902	TIME	JGS	0.30	285.00	85.50	85.50
1/24/2018		Review Corres.	0.00	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00			
Reviewed email from Bill Warnock with offer of \$20,857 from Travelers; made telephone call to client (not available; left message on voice mail); forwarded email from Bill Warnock with recommendation to accept offer.		Morris. Otis	0.00			
Total: 1/24/2018						
		Billable	0.30		85.50	85.50
		Unbillable	0.00		0.00	
		Total	0.30		85.50	
Transaction Date: 1/25/2018						
60911	TIME	JGS	0.10	285.00	28.50	0.00
1/25/2018		Return call	0.10	C@1		
Billed	G:9245	2/1/2018 Mathes Auto Sal	0.00	No Charge		
Returned telephone call to Bill Warnock (not		Morris. Otis	0.00			

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								Est. Time	Variance	Bill Status			Adjustment Markup
			available; left message on voice mail).										
60916	TIME			JGS				0.90		285.00		256.50	256.50
1/25/2018				Review document				0.00		C@1			
Billed	G:9245	2/1/2018		Mathes Auto Sal				0.00					
			Reviewed title history provided by SCDMV;	Morris. Otis				0.00					
			forwarded same to client; reviewed file; made										
			telephone call to Phil Porter (not available; left										
			message on voice mail); prepared email to Phil										
			Porter; prepared email to Ron Stanley and										
			Leland Greeley with copy of title history to										
			supplement discovery responses.										
60919	TIME			JGS				0.10		285.00		28.50	0.00
1/25/2018				Return call				0.10		C@1			
Billed	G:9245	2/1/2018		Mathes Auto Sal				0.00		No Charge			
			Returned telephone call to Phil Porter (not	Morris. Otis				0.00					
			available; left message on voice mail).										
60920	TIME			JGS				0.10		285.00		28.50	28.50
1/25/2018				Phone fr client				0.00		C@1			
Billed	G:9245	2/1/2018		Mathes Auto Sal				0.00					
			Received telephone call from Phil Porter	Morris. Otis				0.00					
			regarding status of matter.										
Total: 1/25/2018													
				Billable				1.00				285.00	285.00
				Unbillable				0.20				57.00	
				Total				1.20				342.00	
Transaction Date: 1/26/2018													
60929	TIME			JGS				0.30		285.00		85.50	85.50
1/26/2018				Phone fr client				0.00		C@1			
Billed	G:9245	2/1/2018		Mathes Auto Sal				0.00					
			Received telephone call from Phil Porter	Morris. Otis				0.00					
			(discussed status of case; requested that I										
			send subpoena for Robert Shelley to him).										
60927	TIME			JGS				0.10		285.00		28.50	28.50
1/26/2018				Review Corres.				0.00		C@1			
Billed	G:9245	2/1/2018		Mathes Auto Sal				0.00					
			Reviewed copies of correspondence and notice	Morris. Otis				0.00					
			of appearance from Bill Warnock to Clerk of										
			Court.										

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Total: 1/26/2018					
	Billable	0.40		114.00	114.00
	Unbillable	0.00		0.00	
	Total	0.40		114.00	
Transaction Date: 1/30/2018					
60968 TIME	JGS	0.50	285.00	142.50	142.50
1/30/2018	Review Corres.	0.00	C@1		
Billed G:9245 2/1/2018	Mathes Auto Sal	0.00			
Reviewed email from Leland Greeley with copy of Trial Brief of Dixon's Automotive, LLC; forwarded same to client; reviewed and revised Pre-trial Brief, prepared subpoena for Robert Shelley at SCDMV.	Morris. Otis	0.00			
Total: 1/30/2018					
	Billable	0.50		142.50	142.50
	Unbillable	0.00		0.00	
	Total	0.50		142.50	
Transaction Date: 1/31/2018					
60979 TIME	JGS	3.20	285.00	912.00	912.00
1/31/2018	Review document	0.00	C@1		
Billed G:9245 2/1/2018	Mathes Auto Sal	0.00			
Reviewed Gerald Dixon and Michael Moore's depositions; reviewed and revised Pre-trial Brief.	Morris. Otis	0.00			
60984 TIME	JGS	0.40	285.00	114.00	114.00
1/31/2018	Review/Revise	0.00	C@1		
Billed G:9245 2/1/2018	Mathes Auto Sal	0.00			
Reviewed and revised Pretrial Brief, reviewed and executed Pretrial Brief, prepared email to Judge Strickland with same.	Morris. Otis	0.00			
60988 TIME	JGS	0.20	285.00	57.00	57.00
1/31/2018	Review/Execute	0.00	C@1		
Billed G:9245 2/1/2018	Mathes Auto Sal	0.00			
Reviewed and executed subpoena for Robert Shelley; forwarded copy of pre-trial brief to Phil Porter; emailed subpoena for Robert Shelley to Phil Porter.	Morris. Otis	0.00			
Total: 1/31/2018					
	Billable	3.80		1083.00	1083.00

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client Reference	Est. Time	Bill Status		Markup
			Variance			
		Unbillable	0.00		0.00	
		Total	3.80		1083.00	
<u>Transaction Date: 2/1/2018</u>						
60990	TIME	JGS	0.50	285.00	142.50	142.50
2/1/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed Rule 45, SCRCP; reviewed recent title history from SCDMV; prepared email to Phil Porter; issued check for witness fee and mileage to Robert Shelley; prepared correspondence to Phil Porter with hard copy of subpoena and check.			0.00			
60991	EXP	JGS	1	150.00	150.00	150.00
2/1/2018		Misc.				
Billed	G:9274	3/1/2018 Mathes Auto Sal				
\$150 paid to Robert Shelley.						
60997	TIME	JGS	0.10	285.00	28.50	28.50
2/1/2018		Review Corres.	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed email from Phil Porter and replied regarding possible meeting with Robert Shelley on Monday in Blythewood.			0.00			
Total: 2/1/2018						
		Billable	0.60		321.00	321.00
		Unbillable	0.00		0.00	
		Total	0.60		321.00	
<u>Transaction Date: 2/2/2018</u>						
61002	TIME	RGS	1.70	150.00	255.00	255.00
2/2/2018		Research	0.00	C		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Researched Rules of Evidence and case law for justification to introduce testimony of Don Deese and the police officer who investigated the case at trial.			0.00			
61003	TIME	JGS	0.30	285.00	85.50	85.50
2/2/2018		Return call	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Returned telephone call to client (scheduled meeting for Wednesday at 2:00); made telephone call to Don Deese regarding testifying at trial; prepared subpoenas for Don Deese and			0.00			

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Slip ID		Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time		Activity	DNB Time	Rate Info		Adjustment
Posting Status		Client	Est. Time	Bill Status		Markup
Description		Reference	Variance			
Inv. Duckett.						
61004	TIME	JGS	0.10	285.00	28.50	28.50
2/2/2018		Review/Execute	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed and executed subpoenas for Inv. Duckett and Don Deese.			0.00			
61012	TIME	JGS	0.20	285.00	57.00	57.00
2/2/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed research on punitive damages and prior bad acts provided by associate.			0.00			
Total: 2/2/2018						
		Billable	2.30		426.00	426.00
		Unbillable	0.00		0.00	
		Total	2.30		426.00	
<u>Transaction Date: 2/4/2018</u>						
61018	TIME	JGS	2.20	285.00	627.00	627.00
2/4/2018		Review File	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed file; prepared for trial.			0.00			
61019	TIME	JGS	0.60	285.00	171.00	171.00
2/4/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed Otis Morris' deposition.			0.00			
Total: 2/4/2018						
		Billable	2.80		798.00	798.00
		Unbillable	0.00		0.00	
		Total	2.80		798.00	
<u>Transaction Date: 2/5/2018</u>						
61024	TIME	JGS	0.50	285.00	142.50	142.50
2/5/2018		Travel	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Traveled to and from Richland County Judicial Center; hand-delivered Otis Morris' deposition for filing; hand-delivered original Pre-trial Brief to Judge Strickland's chambers.			0.00			

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	Description	Client	Est. Time	Bill Status		Markup
		Reference	Variance			
61025	TIME	JGS	0.70	285.00	199.50	199.50
2/5/2018		Review File	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Resumed review of file and preparation for trial; reviewed email from Christy Jones and responded to same.			0.00			
61023	TIME	JGS	1.00	285.00	285.00	285.00
2/5/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed Rule 32, SCRCP; prepared correspondence to Judge Strickland to designate excerpts of Otis Morris' deposition and exhibits for use at trial.			0.00			
61022	TIME	JGS	2.00	285.00	570.00	570.00
2/5/2018		Travel	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Traveled to and from SCDMV; met with Phil Porter and Robert Shelley.			0.00			
Total: 2/5/2018						
		Billable	4.20		1197.00	1197.00
		Unbillable	0.00		0.00	
		Total	4.20		1197.00	
<u>Transaction Date: 2/6/2018</u>						
61030	TIME	JGS	2.40	285.00	684.00	684.00
2/6/2018		Review File	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Resumed review of file and preparation for trial; prepared correspondence to Judge Strickland designating excerpts of Moore deposition.			0.00			
61031	TIME	JGS	2.00	285.00	570.00	570.00
2/6/2018		Review/Execute	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed and executed correspondence to Judge Strickland; resumed review of file and preparation for trial; traveled to and from Richland County Judicial Center (hand-delivered Moore and Dixon transcripts); reviewed Court's file regarding Sharpe v. Morris.			0.00			
61033	TIME	JGS	0.10	285.00	28.50	28.50
2/6/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			

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			Reviewed affidavits of service of subpoenas upon Deese and Duckett; issued check for service of process.		0.00			
61034	EXP			JGS	1	110.00	110.00	110.00
	2/6/2018			Service Fee				
	Billed	G:9274	3/1/2018	Mathes Auto Sal				
			\$110 paid to Dukes Investigations.					
61037	TIME			JGS	0.30	285.00	85.50	85.50
	2/6/2018			Phone fr client	0.00	C@1		
	Billed	G:9274	3/1/2018	Mathes Auto Sal	0.00			
			Received telephone call from Andrew Walden at Womble Bond Dickinson in Charleston regarding status of settlement; prepared email to Judge Strickland to confirm settlement with Travelers only.		0.00			
61041	TIME			JGS	0.80	285.00	228.00	228.00
	2/6/2018			Review document	0.00	C@1		
	Billed	G:9274	3/1/2018	Mathes Auto Sal	0.00			
			Reviewed client's deposition.		0.00			
Total: 2/6/2018								
				Billable	5.60		1706.00	1706.00
				Unbillable	0.00		0.00	
				Total	5.60		1706.00	
<u>Transaction Date: 2/7/2018</u>								
61042	TIME			RGS	4.20	150.00	630.00	630.00
	2/7/2018			Review document	0.00	C		
	Billed	G:9274	3/1/2018	Mathes Auto Sal	0.00			
			Reviewed depositions of Otis Morris, Gerald Dixon, and Michael Moore to read at hearing the following day; retrieved case law requested by JGS to show that an employee of dealership can violate the Dealers Act; researched basis for introducing deposition testimony of Michael Moore and Gerald Dixon.		0.00			
61045	TIME			JGS	0.70	285.00	199.50	199.50
	2/7/2018			Phone to client	0.00	C@1		
	Billed	G:9274	3/1/2018	Mathes Auto Sal	0.00			
			Made telephone call to Tarica Worthy (not available; left message on voice mail); reviewed file; gathered documents for Tarica Worthy; prepared email to Tarica Worthy with same.		0.00			

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61048	TIME			JGS	3.60	285.00	1026.00	1026.00
2/7/2018				Review File	0.00	C@1		
Billed	G:9274	3/1/2018	Mathes Auto Sal		0.00			
Resumed review of file and preparation for trial; issued check for witness fee to Daniel Harms; office conference with client to prepare for trial.					0.00			
61049	EXP			JGS	1	25.00	25.00	25.00
2/7/2018				Misc.				
Billed	G:9274	3/1/2018	Mathes Auto Sal					
\$25.00 paid to Daniel Harms for witness fee.								
Total: 2/7/2018								
				Billable	8.50		1880.50	1880.50
				Unbillable	0.00		0.00	
				Total	8.50		1880.50	
Transaction Date: 2/8/2018								
61052	TIME			RGS	7.20	150.00	1080.00	1080.00
2/8/2018				Attend hearing	0.00	C		
Billed	G:9274	3/1/2018	Mathes Auto Sal		0.00			
Attended trial and read deposition transcripts for publication.					0.00			
61053	TIME			JGS	9.20	285.00	2622.00	2622.00
2/8/2018				Preparation	0.00	C@1		
Billed	G:9274	3/1/2018	Mathes Auto Sal		0.00			
Resumed preparation for trial; traveled to and from Richland County Judicial Center for trial.					0.00			
Total: 2/8/2018								
				Billable	16.40		3702.00	3702.00
				Unbillable	0.00		0.00	
				Total	16.40		3702.00	
Transaction Date: 2/9/2018								
61063	TIME			JGS	0.50	285.00	142.50	142.50
2/9/2018				Review Corres.	0.00	C@1		
Billed	G:9274	3/1/2018	Mathes Auto Sal		0.00			
Reviewed email from Christy Jones; prepared correspondence to Daniel Harms with check for witness fee.					0.00			
61056	TIME			JGS	0.30	285.00	85.50	85.50
2/9/2018				Review Corres.	0.00	C@1		
Billed	G:9274	3/1/2018	Mathes Auto Sal		0.00			

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Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Reviewed emails from client; received telephone call from client regarding status of case.		0.00			
61055	JGS	0.80	285.00	228.00	228.00
2/9/2018	Prepare documen	0.00	C@1		
Billed	3/1/2018 Mathes Auto Sal	0.00			
Prepared email to Christy Jones to express appreciation for her cooperation with credit union; prepared summary of carnage caused by Otis and email to client.		0.00			
Total: 2/9/2018					
	Billable	1.60		456.00	456.00
	Unbillable	0.00		0.00	
	Total	1.60		456.00	
Transaction Date: 2/10/2018					
61067	JGS	2.00	285.00	570.00	570.00
2/10/2018	Prepare documen	0.00	C@1		
Billed	3/1/2018 Mathes Auto Sal	0.00			
Prepared argument in response to Dixon's anticipated motion for directed verdict; prepared proposed direct examination for C. B. Duckett.		0.00			
Total: 2/10/2018					
	Billable	2.00		570.00	570.00
	Unbillable	0.00		0.00	
	Total	2.00		570.00	
Transaction Date: 2/11/2018					
61069	JGS	5.20	285.00	1482.00	1482.00
2/11/2018	Preparation	0.00	C@1		
Billed	3/1/2018 Mathes Auto Sal	0.00			
Resumed preparation for trial.		0.00			
Total: 2/11/2018					
	Billable	5.20		1482.00	1482.00
	Unbillable	0.00		0.00	
	Total	5.20		1482.00	
Transaction Date: 2/12/2018					
61070	RGS	4.20	150.00	630.00	630.00
2/12/2018	Attend hearing	0.00	C		
Billed	3/1/2018 Mathes Auto Sal	0.00			
Attended trial and read deposition transcripts for		0.00			

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	Posting Status	Activity	DNB Time	Rate Info		Adjustment
	Description	Client	Est. Time	Bill Status		Markup
	publication.	Reference	Variance			
61071	TIME	JGS	4.30	285.00	1225.50	1225.50
2/12/2018		Preparation	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Resumed preparation for trial; traveled to and from Richland County Judicial Center; attended 2nd day of trial.			0.00			
61075	TIME	JGS	1.20	285.00	342.00	342.00
2/12/2018		Review File	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed file; began drafting proposed Order For Judgment.			0.00			
Total: 2/12/2018						
		Billable	9.70		2197.50	2197.50
		Unbillable	0.00		0.00	
		Total	9.70		2197.50	
Transaction Date: 2/13/2018						
61077	TIME	RGS	4.00	150.00	600.00	600.00
2/13/2018		Review document	0.00	C		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed Rule 15(b), <u>Jackson v. Speed</u> , Pre-Trial Brief and depositions of Moore and Dixon; drafted Motion to Conform Pleadings to the Evidence.			0.00			
61078	TIME	JGS	5.70	285.00	1624.50	1624.50
2/13/2018		Review File	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Resumed review of file and drafting proposed Order.			0.00			
61080	TIME	JGS	0.40	285.00	114.00	114.00
2/13/2018		Review/Revise	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed and revised first portion of proposed Order; prepared email to client with draft in progress.			0.00			
61081	TIME	JGS	0.50	285.00	142.50	142.50
2/13/2018		Review Corres.	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed email from Andrew Walden with proposed Settlement Agreement And Release			0.00			

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	for Travelers; reviewed supplemental motion to conform pleadings to the evidence drafted by associate; prepared email to Andrew Walden regarding modifying Settlement Agreement And Release.					
Total: 2/13/2018						
		Billable	10.60		2481.00	2481.00
		Unbillable	0.00		0.00	
		Total	10.60		2481.00	
Transaction Date: 2/14/2018						
61082	TIME	RGS	0.30	150.00	45.00	45.00
2/14/2018		Review/Revise	0.00	C		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Per JGS, made edits to Motion to Conform Pleadings to the Evidence.			0.00			
61085	TIME	JGS	1.60	285.00	456.00	456.00
2/14/2018		Draft	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Resumed drafting Analysis portion of proposed Order.			0.00			
61086	TIME	JGS	0.20	285.00	57.00	57.00
2/14/2018		Return call	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Returned telephone call to client (discussed benefits of ordering a partial transcript; also discussed progress on proposed Order).			0.00			
61089	TIME	JGS	0.20	285.00	57.00	57.00
2/14/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed Order of Proof, prepared email to court reporter to request a partial transcript of trial.			0.00			
61092	TIME	JGS	0.40	285.00	114.00	114.00
2/14/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Redlined settlement agreement with Travelers per Andrew Walden's request.			0.00			
Total: 2/14/2018						
		Billable	2.70		729.00	729.00

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								Est. Time		Bill Status		Adjustment
								Variance				Markup
					Unbillable			0.00			0.00	
					Total			2.70			729.00	
<u>Transaction Date: 2/15/2018</u>												
61102	TIME			JGS			1.90		285.00		541.50	541.50
2/15/2018					Prepare documen		0.00		C@1			
Billed	G:9274	3/1/2018			Mathes Auto Sal		0.00					
Resumed preparation of proposed Order.								0.00				
61101	EXP			JGS			1		750.00		750.00	750.00
2/15/2018					Transcript							
Billed	G:9274	3/1/2018			Mathes Auto Sal							
\$750 paid to Verbatim, Inc. for court reporter services.												
61095	TIME			JGS			2.10		285.00		598.50	598.50
2/15/2018					Review document		0.00		C@1			
Billed	G:9274	3/1/2018			Mathes Auto Sal		0.00					
Resumed review of Dealers Act and preparation of proposed Order.								0.00				
61099	TIME			JGS			0.20		285.00		57.00	57.00
2/15/2018					Review Corres.		0.00		C@1			
Billed	G:9274	3/1/2018			Mathes Auto Sal		0.00					
Reviewed email from Andrew Walden regarding statute applicable to RV dealers and replied to same.								0.00				
61097	TIME			JGS			0.30		285.00		85.50	85.50
2/15/2018					Review Corres.		0.00		C@1			
Billed	G:9274	3/1/2018			Mathes Auto Sal		0.00					
Reviewed email from Andrew Walden and replied to same.								0.00				
<u>Total: 2/15/2018</u>												
					Billable		4.50				2032.50	2032.50
					Unbillable		0.00				0.00	
					Total		4.50				2032.50	

Transaction Date: 2/16/2018

61105	EXP			JGS			1		25.00		25.00	25.00
2/16/2018					Filing Fee							
Billed	G:9274	3/1/2018			Mathes Auto Sal							
\$25.00 paid to Clerk of Court for filing fee.												

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	Posting Status	Activity	DNB Time	Rate Info		Adjustment
	Description	Client	Est. Time	Bill Status		Markup
		Reference	Variance			
61106	TIME	JGS	0.50	285.00	142.50	142.50
2/16/2018		Review/Revise	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Issued check for filing fee; reviewed and revised supplemental motion to amend.			0.00			
61107	TIME	JGS	1.20	285.00	342.00	342.00
2/16/2018		Review/Execute	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed and executed motion; resumed drafting order; hand-delivered motion for filing.			0.00			
61109	TIME	JGS	0.10	285.00	28.50	28.50
2/16/2018		Prepared letter	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Prepared email to Leland Greeley with copy of supplemental motion to conform the pleadings to the evidence.			0.00			
61111	TIME	JGS	0.80	285.00	228.00	228.00
2/16/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed SCDMV Dealer and Wholesaler Manual.			0.00			
Total: 2/16/2018						
		Billable	2.60		766.00	766.00
		Unbillable	0.00		0.00	
		Total	2.60		766.00	
Transaction Date: 2/17/2018						
61112	TIME	RGS	4.80	150.00	720.00	720.00
2/17/2018		Research	0.00	C		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Researched basis for holding member of an LLC personally liable; drafted brief for Judge Strickland regarding why Dixon and Moore should be treated as a partnership subject to individual liability.			0.00			
61114	TIME	JGS	2.20	285.00	627.00	627.00
2/17/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Resumed harvesting facts from excerpts of deposition of Michael Moore; resumed drafting Order.			0.00			

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61115	TIME			JGS	3.50	285.00	997.50	997.50
2/17/2018				Review document	0.00	C@1		
Billed	G:9274	3/1/2018		Mathes Auto Sal	0.00			
Resumed harvesting facts from excerpts of Michael Moore's deposition; resumed drafting Order.					0.00			
Total: 2/17/2018								
				Billable	10.50		2344.50	2344.50
				Unbillable	0.00		0.00	
				Total	10.50		2344.50	
Transaction Date: 2/18/2018								
61116	TIME			JGS	0.60	285.00	171.00	171.00
2/18/2018				Review document	0.00	C@1		
Billed	G:9274	3/1/2018		Mathes Auto Sal	0.00			
Began harvesting facts from Gerald Dixon's deposition.					0.00			
Total: 2/18/2018								
				Billable	0.60		171.00	171.00
				Unbillable	0.00		0.00	
				Total	0.60		171.00	
Transaction Date: 2/19/2018								
61125	TIME			JGS	0.60	285.00	171.00	171.00
2/19/2018				Review document	0.00	C@1		
Billed	G:9274	3/1/2018		Mathes Auto Sal	0.00			
Reviewed Memorandum in support of motions to conform pleadings to the evidence drafted by associate; reviewed and revised draft of proposed Order.					0.00			
61124	EXP			JGS	1	91.73	91.73	91.73
2/19/2018				Misc.				
Billed	G:9274	3/1/2018		Mathes Auto Sal				
\$91.73 paid to C. B. Duckett.								
61123	EXP			JGS	1	38.19	38.19	38.19
2/19/2018				Misc.				
Billed	G:9274	3/1/2018		Mathes Auto Sal				
\$38.19 paid to Donald W. Deese.								
61121	TIME			JGS	0.70	285.00	199.50	199.50
2/19/2018				Prepare document	0.00	C@1		
Billed	G:9274	3/1/2018		Mathes Auto Sal	0.00			

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			Issued checks to witnesses for witness fee and mileage.								0.00							
61122	2/19/2018	EXP	Billed \$37.73 paid to Tarica Worthy.	JGS	Misc.		3/1/2018 Mathes Auto Sal	1				37.73			37.73			37.73
61120	2/19/2018	TIME	Billed Resumed drafting Order.	JGS	Draft		3/1/2018 Mathes Auto Sal	1.80				285.00	C@1		513.00			513.00
								0.00										
								0.00										
								0.00										
61118	2/19/2018	TIME	Billed Made revisions and additions to Memorandum in Support per JGS.	RGS	Review/Revise		3/1/2018 Mathes Auto Sal	1.10				150.00	C		165.00			165.00
								0.00										
								0.00										
								0.00										
Total: 2/19/2018																		
					Billable			4.20							1216.15			1216.15
					Unbillable			0.00							0.00			
					Total			4.20							1216.15			
Transaction Date: 2/21/2018																		
61134	2/21/2018	TIME	Billed Resumed harvesting facts from deposition excerpts; resumed drafting proposed Order.	JGS	Prepare documen		3/1/2018 Mathes Auto Sal	4.60				285.00	C@1		1311.00			1311.00
								0.00										
								0.00										
								0.00										
Total: 2/21/2018																		
					Billable			4.60							1311.00			1311.00
					Unbillable			0.00							0.00			
					Total			4.60							1311.00			
Transaction Date: 2/22/2018																		
61140	2/22/2018	TIME	Billed Per JGS, made final revisions to Memorandum in Support of Motions to Conform Pleadings to the Evidence.	RGS	Review/Revise		3/1/2018 Mathes Auto Sal	0.20				150.00	C		30.00			30.00
								0.00										
								0.00										
								0.00										

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Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client	Est. Time	Bill Status		Markup
		Reference	Variance			
61147	TIME	JGS	0.30	285.00	85.50	85.50
2/22/2018		Review document	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed Memorandum drafted by associate; reviewed and revised same.			0.00			
61158	TIME	JGS	0.20	285.00	57.00	57.00
2/22/2018		Review Corres.	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed email from Andrew Walden regarding bond number; reviewed file and responded to same.			0.00			
Total: 2/22/2018						
		Billable	0.70		172.50	172.50
		Unbillable	0.00		0.00	
		Total	0.70		172.50	
Transaction Date: 2/23/2018						
61162	TIME	RGS	0.20	150.00	30.00	30.00
2/23/2018		Research	0.00	C		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Per JGS, researched cases addressing S36-2-403.			0.00			
61166	TIME	JGS	0.40	285.00	114.00	114.00
2/23/2018		Review/Execute	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed and executed Plaintiffs Memorandum In Support Of Motions To Conform Pleadings To The Evidence; prepared correspondence to Clerk of Court for filing.			0.00			
61168	TIME	JGS	0.10	285.00	28.50	28.50
2/23/2018		Review/Execute	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed and executed correspondence.			0.00			
61171	TIME	JGS	1.90	285.00	541.50	541.50
2/23/2018		Review/Revise	0.00	C@1		
Billed	G:9274	3/1/2018 Mathes Auto Sal	0.00			
Reviewed and revised proposed Order For Judgment.			0.00			
Total: 2/23/2018						
		Billable	2.60		714.00	714.00

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
	Unbillable	0.00		0.00	
	Total	2.60		714.00	
<u>Transaction Date: 2/25/2018</u>					
61172	JGS	1.70	285.00	484.50	484.50
2/25/2018	Prepare documen	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:9274 3/1/2018		0.00			
Resumed preparation of Order; reviewed case					
law on entrustment provisions of U.C.C.					
Total: 2/25/2018	Billable	1.70		484.50	484.50
	Unbillable	0.00		0.00	
	Total	1.70		484.50	
<u>Transaction Date: 2/26/2018</u>					
61183	JGS	1.00	285.00	285.00	285.00
2/26/2018	Review/Revise	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:9274 3/1/2018		0.00			
Reviewed and revised draft of Order.					
Total: 2/26/2018	Billable	1.00		285.00	285.00
	Unbillable	0.00		0.00	
	Total	1.00		285.00	
<u>Transaction Date: 2/27/2018</u>					
61200	JGS	0.80	285.00	228.00	228.00
2/27/2018	Review document	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:9274 3/1/2018		0.00			
Began review of Bench Trial Testimony					
Excerpts.					
Total: 2/27/2018	Billable	0.80		228.00	228.00
	Unbillable	0.00		0.00	
	Total	0.80		228.00	
<u>Transaction Date: 2/28/2018</u>					
61210	JGS	4.80	285.00	1368.00	1368.00
2/28/2018	Review document	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:9274 3/1/2018		0.00			
Resumed review of Transcript; prepared email to					
Andrew Walden regarding availability of					
settlement check; reviewed Criminal Offenses in					

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
South Carolina Third Edition by John R. Ferguson; resumed drafting Order.					
Total: 2/28/2018					
	Billable	4.80		1368.00	1368.00
	Unbillable	0.00		0.00	
	Total	4.80		1368.00	
Transaction Date: 3/1/2018					
61222 TIME	JGS	1.30	285.00	370.50	370.50
3/1/2018	Review/Revise	0.00	C@1		
Billed G:9309	Mathes Auto Sal	0.00			
Reviewed and revised draft of Order.	Morris. Otis	0.00			
Total: 3/1/2018					
	Billable	1.30		370.50	370.50
	Unbillable	0.00		0.00	
	Total	1.30		370.50	
Transaction Date: 3/2/2018					
61227 TIME	JGS	0.50	285.00	142.50	142.50
3/2/2018	Review document	0.00	C@1		
Billed G:9309	Mathes Auto Sal	0.00			
Reviewed client's tax returns; resumed review and revision of proposed Order.		0.00			
Total: 3/2/2018					
	Billable	1.30		370.50	370.50
	Unbillable	0.00		0.00	
	Total	1.30		370.50	
Transaction Date: 3/9/2018					
61274 TIME	JGS	0.20	285.00	57.00	57.00
3/9/2018	Review Corres.	0.00	C@1		
Billed G:9309	Mathes Auto Sal	0.00			
Reviewed copies of email and Defendant's Memorandum opposing Plaintiffs Motions To Conform Pleadings To The Evidence By Adding Parties from Leland Greeley to Judge Strickland.	Morris. Otis	0.00			

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Slip ID	Timekeeper	Units	Rate	Slip Value	Billed SV
Dates and Time	Activity	DNB Time	Rate Info		Adjustment
Posting Status	Client	Est. Time	Bill Status		Markup
Description	Reference	Variance			
Total: 3/9/2018					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 3/12/2018					
61280	JGS	0.20	285.00	57.00	57.00
TIME					
3/12/2018	Review Corres.	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:9309					
4/3/2018	Morris. Otis	0.00			
Reviewed copies of email and proposed Order from Leland Greeley to Judge Strickland.					
Total: 3/12/2018					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	
Transaction Date: 3/13/2018					
61289	JGS	0.10	285.00	28.50	28.50
TIME					
3/13/2018	Review Corres.	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:9309					
4/3/2018	Morris. Otis	0.00			
Reviewed email from client regarding timing of issuance of order and potential changes and responded to same.					
Total: 3/13/2018					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Transaction Date: 3/14/2018					
61313	JGS	0.20	285.00	57.00	57.00
TIME					
3/14/2018	Review Corres.	0.00	C@1		
Billed	Mathes Auto Sal	0.00			
G:9309					
4/3/2018	Morris. Otis	0.00			
Reviewed copies of correspondence, Settlement Agreement and Release, and check emailed by Andrew Walden.					
Total: 3/14/2018					
	Billable	0.20		57.00	57.00
	Unbillable	0.00		0.00	
	Total	0.20		57.00	

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value	Billed SV
Posting Status		Activity	DNB Time	Rate Info		Adjustment
Description		Client Reference	Est. Time	Bill Status		Markup
			Variance			
<u>Transaction Date: 3/16/2018</u>						
61332	TIME	JGS	0.40	285.00	114.00	114.00
3/16/2018		Review document	0.00	C@1		
Billed	G:9309	4/3/2018 Mathes Auto Sal	0.00			
Reviewed proposed Order e-filed by Ron Stanley; prepared email to Judge Strickland regarding status of matter.						
61339	TIME	JGS	0.30	285.00	85.50	85.50
3/16/2018		Review document	0.00	C@1		
Billed	G:9309	4/3/2018 Mathes Auto Sal	0.00			
Reviewed executed original of Settlement Agreement And Release; prepared correspondence to Andrew Walden with same.						
<u>Total: 3/16/2018</u>						
		Billable	0.70		199.50	199.50
		Unbillable	0.00		0.00	
		Total	0.70		199.50	
<u>Transaction Date: 3/19/2018</u>						
61359	EXP	JGS	1	31.74	31.74	31.74
3/19/2018		Filing Fee				
Billed	G:9309	4/3/2018 Mathes Auto Sal				
\$31.74 paid to Richland County for e-filing proposed Order For Judgment.						
<u>Total: 3/19/2018</u>						
		Billable	0.00		31.74	31.74
		Unbillable	0.00		0.00	
		Total	0.00		31.74	
<u>Transaction Date: 5/14/2018</u>						
61809	TIME	JGS	1.50	285.00	427.50	427.50
5/14/2018		Review File	0.00	C@1		
Billed	G:9369	6/1/2018 Mathes Auto Sal	0.00			
Reviewed file; began preparation of correspondence to Judge Strickland.						
61810	TIME	JGS	0.10	285.00	28.50	28.50
5/14/2018		Prepared letter	0.00	C@1		
Billed	G:9369	6/1/2018 Mathes Auto Sal	0.00			
Prepared email to Noelle regarding preparation of enclosures for Judge Strickland.						

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
Total: 5/14/2018					
	Billable	1.60		456.00	456.00
	Unbillable	0.00		0.00	
	Total	1.60		456.00	
Transaction Date: 5/16/2018					
61828 TIME	JGS	1.30	285.00	370.50	370.50
5/16/2018	Review document	0.00	C@1		
Billed G:9369 6/1/2018	Mathes Auto Sal	0.00			
Reviewed proposed Order For Judgment; reviewed and revised proposed correspondence to Judge Strickland.		Morris. Otis	0.00		
61835 TIME	JGS	0.80	285.00	228.00	228.00
5/16/2018	Review/Revise	0.00	C@1		
Billed G:9369 6/1/2018	Mathes Auto Sal	0.00			
Reviewed and revised correspondence to Judge Strickland; hand-delivered correspondence and supporting documents to Judge Strickland.		Morris. Otis	0.00		
Total: 5/16/2018					
	Billable	2.10		598.50	598.50
	Unbillable	0.00		0.00	
	Total	2.10		598.50	
Transaction Date: 6/4/2018					
61930 TIME	JGS	0.10	285.00	28.50	28.50
6/4/2018	Review Corres.	0.00	C@1		
WIP	Mathes Auto Sal	0.00			
Reviewed correspondence from Ron Stanley.			0.00		
Total: 6/4/2018					
	Billable	0.10		28.50	28.50
	Unbillable	0.00		0.00	
	Total	0.10		28.50	
Grand Total					
	Billable	362.20		97237.24	97237.24
	Unbillable	3.80		1083.00	
	Total	366.00		98320.24	

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STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND) CASE NO. 2016-CP-40-06794

MATHES AUTO SALES, INC.,)
))
Plaintiff,)

v.)

OTIS MORRIS, JR., PRO BOWL MO-)
TORS, INC., GERALD SCOTT DIXON,)
MICHAEL TYRONE MOORE, and)
DIXON'S AUTOMOTIVE, LLC,)

Defendants.)

**ORDER GRANTING MOTION FOR
ATTORNEY'S FEES AND COSTS**

This matter came before me on January 3, 2019, pursuant to a motion for attorney's fees and costs filed by the Plaintiff on July 2, 2018. Present for the hearing were J. Gregory Studemeyer and Ryan G. Studemeyer, attorneys for the Plaintiff; H. Ronald Stanley, attorney for Defendants, Otis Morris, Jr. and Pro Bowl Motors, Inc.; and Leland B. Greeley, attorney for Gerald Scott Dixon, Michael Tyrone Moore and Dixon Automotive, LLC. For the reasons set forth below, the Plaintiff's motion for attorney's fees and costs is GRANTED.

A bench trial in this matter came before me on February 8, 2018, and February 12, 2018. On June 20, 2018, I issued a detailed order for judgment with findings of fact and conclusions of law supporting an award in favor of the Plaintiff under the Dealers Act, S.C. Code Ann. §56-15-10, et. seq.

An award under the Dealers Act mandates an award of attorney's fees. The Dealers Act provides that in addition to temporary or permanent injunctive relief as provided in §56-15-40(3)(c), any person who shall be injured in his business or property by reason of anything forbidden in this chapter may sue therefor in the court of common pleas and *shall* recover double the actual damages by him sustained, and the costs of suit, including a reasonable attorney's fee. S.C. Code Ann. §56-15-110(1). (emphasis added).

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The specific amount of attorney's fees awarded pursuant to a statute authorizing reasonable attorney's fees is left to the discretion of the trial judge and will not be disturbed absent an abuse of discretion. South Carolina Dept. of Transp. v. Revels, 411 S.C. 1, 766 S.E.2d 700 (2014). When awarding attorney's fees, the trial court must consider the following six factors: (1) the nature, extent, and difficulty of the legal services rendered; (2) the time and labor necessarily devoted to the case; (3) the professional standing of counsel; (4) the contingency of compensation; (5) the fee customarily charged in the locality for similar legal services; and (6) the beneficial results obtained. Williamson v. Middleton, 374 S.C. 419, 640 S.E.2d 57 (Ct. App. 2007).

FINDINGS OF FACT

The Nature, Extent, and Difficulty of the Case¹

This case involved the entrustment statute, Section 36-2-403 of the Uniform Commercial Code, and its interpretation. It also involved several provisions of Article 3 of Chapter 19 of Title 56 concerning Protection of Titles and Interests in Motor Vehicles. It also involved the Act Regulating Manufacturers, Distributors and Dealers in Chapter 15 of Title 56.

Otis Morris, Jr., owner of Pro Bowl Motors, sold an expensive used car to Ms. Tarica Worthy, a friend of a former investor in Pro Bowl, John Abraham. Morris did not own the car. He did not have possession of the car. In fact, he had never seen it.

Worthy had purchased several previous vehicles from Morris. She contacted him about her interest in an Infiniti QX60 after her Audi Q7 was damaged in a flood. Morris located the Infiniti through an online vehicle exchange at an auction in Florida.

¹ Detailed findings of fact are set forth in the Order for Judgment.

Morris had no money to buy the Infiniti for Worthy. At that time, he was working for McDaniels Acura in Northeast Columbia. He had sold the property where Pro Bowl previously operated and no longer conducted a retail automobile business of his own.

Morris met with Worthy at an office building on Hampton Street in Columbia. There were no vehicles displayed for sale. The two of them executed documents for the sale of the Infiniti that neither of them had ever seen.

Morris arranged financing for Worthy through State Credit Union. The credit union issued a check dated May 12, 2016, for \$16,026.00 made payable to Pro Bowl bearing a restrictive endorsement guaranteeing the credit union that it would be listed as first lienholder on the title for the Infiniti. Morris pocketed that money and never recorded the lien as promised.

Several days later, on May 16, 2016, Morris and Worthy met at a McDonald's restaurant in Northeast Columbia near McDaniels Acura. At that time, Worthy tendered her check in the amount of \$20,000.00 to Morris for the balance of the balance of the purchase price. Morris pocketed that money too.

On the following day, Dixon's partner, Moore, purchased the vehicle online from the auction in Florida and arranged to have it shipped to Morris. Dixon was also a former investor in Pro Bowl. Although Dixon and Moore had previously engaged in the retail automobile business, they were no longer licensed to do so and only had a wholesaler license. Moore and Dixon authorized the auction to access their line of credit with NextGear Capital for \$34,147.79 to pay for the Infiniti.

Morris delivered the vehicle to Worthy. At the time of delivery, Morris told Worthy that he would need to get the vehicle back from her at some point in time to have it serviced, make minor repairs, and to arrange to have it registered in her name. Thereafter, on several occasions, Morris provided loaner vehicles from McDaniels Acura to Worthy while representing that he was having the Infiniti serviced, repaired, or registered.

On at least two of those occasions, the vehicle was returned to Dixon's home for inspection by NextGear for floor plan audits. Neither Moore nor Dixon ever told NextGear that the vehicle had been entrusted to Morris.

Morris arranged to have the vehicle that he had already sold to Worthy transported to an auction in Darlington, South Carolina to sell again. This time, Morris was the *buyer* rather than the seller. Morris misappropriated Mathes' line of credit with NextGear to bid on the vehicle in Mathes' name.

After the *sale*, Morris arranged to have the vehicle returned to Worthy. NextGear deducted \$35,275.00 from Mathes' line of credit and applied it to Dixon and Moore's line of credit. When the dust finally settled, Worthy had the car, Morris had pocketed over \$36,000, Dixon and Moore's line of credit with NextGear for the purchase of the vehicle had been satisfied, and Mathes had no car but NextGear claimed that it owed \$35,275.00 for a car that it had never agreed to purchase.

As reflected in the time records attached to the attorney's fee affidavit, the foregoing activity required counsel for the Plaintiff to engage in extensive investigation. Because Morris, Moore, Dixon, and Worthy were all acquainted with one another, counsel for the Plaintiff encountered considerable reluctance by them to cooperate in the investigation. As a result, Requests For Dealer Licenses and a Request For Vehicle Information were submitted to the South Carolina Department of Motor Vehicles. Numerous subpoenas were issued to secure documents establishing the detailed facts of this matter.

Depositions of Morris², Dixon, and Moore were required. Mathes was also required to submit to a deposition. All the while, Mathes was fighting a war on several fronts, i.e., defending itself against claims by NextGear, attempting to survive without access to inventory financing and access to auctions to purchase inventory, and prosecuting its claims against the Defendants.

The trial of this matter lasted two days. The Plaintiff presented testimony from Worthy; Daniel Harms, a representative of the credit union; excerpts of the deposition of Morris; testimony from

² In his deposition, Morris asserted his rights against self-incrimination under the Fifth Amendment no less than 19 times, necessitating the depositions of Dixon and Moore.

Donald W. Deese, a victim of a similar episode involving dishonesty by Morris; excerpts of the depositions of Dixon and Moore; and testimony from Officer C.B. Duckett of the Columbia Police Department.

Post-trial motions were filed on behalf of Morris, and on behalf of Dixon, Moore and Dixon Automotive. A hearing on those motions was conducted on January 3, 2019. Both of them were denied.

Given all of the foregoing, I conclude that this was a difficult case.

The Time Necessarily Devoted to the Case

According to the attorney's fee affidavit, counsel for the Plaintiff devoted a total of 362.20 hours prosecuting this case. In addition, counsel incurred costs and expenses of \$4,283.74.

Having carefully reviewed the slip listing attached to the attorney's fee affidavit, I find that the time spent was necessarily devoted to the case.

Professional Standing of Counsel

Lead counsel for the Plaintiff has been admitted to the Bar of the State of South Carolina for over 36 years and counsel for the Defendants did not question his professional standing. I find that counsel for the Plaintiff enjoys excellent professional standing.

Contingency of Compensation

No contingency arrangement was involved in this litigation. Counsel's fees were billed on an hourly basis.

Beneficial Results Obtained

Having obtained an award of double actual damages and punitive damages under the Dealers Act, I find that beneficial results were obtained.

Customary Legal Fees for Similar Services

The fees billed by lead counsel for the Plaintiff were based upon a rate of \$285 per hour. His associate's fees were based upon a rate of \$150 per hour. I find that these rates are reasonable and customary.

CONCLUSIONS OF LAW

I conclude that the Plaintiff is entitled to a reasonable award of attorney's fees. I further conclude that the sum of \$98,206.24 in attorney's fees and \$4,283.74 in costs is a proper award under the circumstances.

IT IS THEREFORE ORDERED that judgment be entered in favor of the Plaintiff against the Defendants for the further sum of \$102,489.98 in attorney's fees and costs.

AND IT IS SO ORDERED.

Joseph M. Strickland
Richland County Master in Equity

Columbia, South Carolina

This ____ day of January, 2019



Richland Common Pleas

Case Caption: Mathes Auto Sales Inc vs Nextgear Capital Inc , defendant, et al
Case Number: 2016CP4006794
Type: Order/Attorney Fees

It is so Ordered

s/Joseph M. Strickland, 3055

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IN THE STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

MATHES AUTO SALES, INC.)

Plaintiff,)

v.)

OTIS MORRIS, JR., PRO BOWL)
MOTORS, INC. and DIXON'S)
AUTOMOTIVE, LLC., GERALD)
DIXON, and MICHAEL MOORE.)

Defendants.)

IN THE COURT OF COMMON PLEAS

Civil Action No.: 2016CP4006794

DEFENDANTS' DIXON AUTOMATIVE,
LLC, GERALD DIXON, AND
MICHAEL MOORE'S MEMORANDUM
IN SUPPORT OF MOTION TO RECONSIDER

This matter came before this Court by reference from the Richland County Court of Common Pleas for a hearing on the merits. Following Plaintiff resting his case, the Defendant Dixon Automotive, LLC moved this Court for a directed verdict in its favor on the basis that Plaintiff had presented insufficient evidence for the Court to reach a factual determination as to whether Dixon would be liable under the single cause action alleged against Dixon under the S.C. Automobile Dealers Act. The Court entered an Order awarding a Judgment for the Plaintiff against the Defendant Dixon Motors, LLC, Gerald Dixon and Michael Moore after granting Plaintiff's motion to conform the pleadings by adding them as Defendants in the case. It is respectfully submitted that the Order should be reconsidered and reformed to remove all of these Defendants as parties to the Order of Judgement.

The Plaintiff instituted this action against the Defendants after Otis Morris, Jr. purchased the subject vehicle on behalf of the Plaintiff via OVE (Online Vehicle Exchange) in August 2016 at the Darlington Automobile Auction. Unknown to the Plaintiff, Defendant Morris had sold the vehicle to a purchaser in May, 2016 and had received the sales price and

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converted it to his own use. Prior to the Plaintiff's purchase by way of Mr. Morris, Dixon Automotive, LLC had purchased the vehicle via OVE from an auction in Florida and had the car delivered to Pro Bowl Motors, Inc. at the request of Mr. Morris on the representation that Mr. Morris believed he had a buyer for the car. Subsequently Mr. Morris had the car returned to Dixon Automotive, LLC misrepresenting to Dixon that the buyer had not been able to secure financing of the automobile.

Plaintiff's cause of action against Dixon Automotive, LLC is based on the South Carolina Dealers Act and alleges that Dixon's actions were "an unfair and deceptive act that was also arbitrary, in bad faith and unconscionable". Although arbitrary conduct is not defined in the Dealers Act, our supreme court has defined it for purposes of the Act to include "acts which are unreasonable, capricious or nonrational; not done according to reason or judgment; depending on will alone." *Taylor v. Nix*, 307 S.C. 551, 555, 416 S.E.2d 619, 621 (1992). Furthermore, our supreme court has defined bad faith as: The opposite of good faith, generally implying or involving actual or constructive fraud, or a design to deceive or mislead another, or a neglect or refusal to [fulfill] some duty or some contractual obligation, not prompted by an honest mistake as to one's rights or duties, but by some interested or sinister motive. *State v. Griffin*, 100 S.C. 331, 333, 84 S.E. 876, 877 (1915) (quoting Black's Law Dictionary). The Dealers Act defines "fraud" to include its "normal legal connotation" as well as "misrepresentation in any manner. *DeBondt v. Carlton Motorcars, Inc.*, 342 S.C. 254, 264, 536 S.E.2d 399 (S.C. App., 2000)

There is no evidence in the record that any agent of Dixon Automotive, LLC knew of the sale to Ms. Worthy. The sale was the fraud committed in this case. Mr. Morris evidently wanted the proceeds from the sale to Worthy. Mr. Morris would know that Dixon Automotive, LLC

wouldn't transfer title for the sale until its floor plan had been paid. For Mr. Morris to be able keep the money at that time he would have to keep the sale to Worthy a secret from Dixon Motors, LLC as well, as shown by the evidence. Mere allegations that Dixon Automotive, LLC didn't follow all the regulations and laws pertaining to sales doesn't come close to rising to the level of participating in a fraud. Dixon Motors, LLC was a wholesaler and Pro Bowl Motors, Inc. was a retailer. Retailers are the only entities with whom wholesalers deal.

Once again, the record is devoid of any evidence of such knowledge or actions on the part of Dixon Automotive, LLC, Dixon or Moore.

Plaintiff's first witness, Tamika Worthy, never offered any evidence regarding Dixon Automotive, LLC, Dixon or Moore.

Plaintiff then read from the deposition of defendant Otis Morris, Jr. and it offered no evidence against Dixon Automotive, LLC, Dixon or Moore regarding the matter before this court.

Plaintiff then read portions of the deposition of Mr. Michael Moore. Mr. Moore deposition read that Mr. Odom, in fact, Mr. Morris had lied to him saying that the buyer had been unable to procure financing. So not only did Mr. Moore not know of the sale to Ms. Worthy, Mr. Morris lied to him about it. Lastly, Mr. Moore stated no one at Dixon Automotive knew of the previous sale by Morris to Worthy until October, 2016, two months after the sale to the Plaintiff.

Plaintiff then called Donald Dease of Capital City Rides, in Columbia, South Carolina. Mr. Dease offered testimony or evidence regarding Dixon Automotive, LLC, Dixon or Moore.

Plaintiff read portions of the deposition of Mr. Dixon which showed that he was an owner of Dixon Automotive, LLC; that he knew little, if anything, about the transaction involved in this matter, and that he is retired as a player from the National Football League.

Plaintiff then called as a witness Investigator Chauncey Duckett of the Columbia Police Department who offered no testimony or evidence regarding Dixon Automotive, LLC, Dixon or Moore.

The last witness for the Plaintiff's case was the Plaintiff. He too offered no testimony or evidence as to any participation in, or knowledge of, Dixon Automotive, LLC, Dixon or Moore, and Mr. Morris's actions.

Finally, Plaintiff entered into evidence over 50 pieces of documentary evidence consisting of various records and transaction documents. None of that evidence in any way linked Dixon Automotive, LLC, Dixon or Moore to the wrongdoing perpetrated by Mr. Morris.

In the case *Collins Entertainment, Inc. v. White*, the South Carolina Supreme Court ruled that when the record is devoid of evidence whereby the [factfinder] would have to speculate or conject to reach a decision, then a directed verdict should be granted. 611 S.E.2d 262, 363 S.C. 546 (SC, 2005).

For this Court to find any connection between Mr. Morris' wrongdoing in this case and Dixon Automotive, LLC, Dixon or Moore, it would need to be based on more than mere speculation and conjecture of theories propounded by the Plaintiff.

It is respectfully submitted that the current Order of Judgment is based solely on the speculation and conjecture of the Plaintiff and should be reconsidered and amended to rule in favor of the Defendant Dixon Motors, LLC and the now, the Defendants Gerald Dixon and Michael Moore.

Further, individual Defendants Dixon and Moore respectfully request that the Order be amended to release them as Defendants in this matter. The Plaintiff moved to conform the pleadings to include them as parties following the resting of the Plaintiff's case.

Defendants reassert the arguments contained in Defendants' Memorandum in Opposition to the Conforming of the Pleadings filed in this case. Additionally, Rule 15(C)(2) provides, "...and (2) knew or should have known that, but for a mistake concerning the identity of the proper party, the action would have been brought against him. In this case there was never a mistake by the Plaintiff of the identity of Mr. Dixon and Mr. Moore. In fact, when the Plaintiff instituted this action, he included Mr. Otis Morris, individually, as well as the company he owned, Pro Bowl Motors, Inc. The Plaintiff knew Mr. Dixon and Mr. Moore were the owners of Dixon Automotive, LLC and yet at no time during the pendency of this action did he move to include them individually until he had concluded presenting his case at the trial of matter. Therefore, Rule 15(c)(2) disallows the Plaintiff to add the individual defendants at the striking of midnight following the presentation of case at trial.

For the previous reason argued and this reason, the Defendants should be removed as Defendants from the Order of Judgment.

Respectfully submitted,

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Rock Hill, South Carolina

December 18, 2018.

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master in Equity

Case No.: 2016-CP-49-6794

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SC Court of Appeals

Mathes Auto Sales, Inc.

Respondent/Appellant

v.

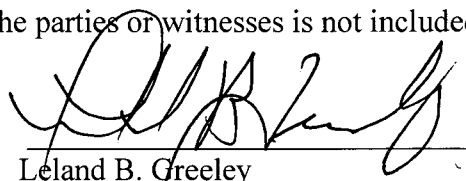
Otis Morris, Jr., Pro Bowl Motors, Inc., Travelers Casualty & Surety Co., of America, Inc.; Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC, Defendants, of whom Otis Moore, Jr., Pro Bowl Motors, Inc., Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC are the Appellants/Respondents.

CERTIFICATION OF CONTENT AND OMISSION OF PERSONAL CONTENT

The undersigned does hereby, in compliance with Rule 210(g), certify that the Record on Appeal includes only that information requested by the parties and not any other material.

Further, personal information of the parties or witnesses is not included in the Record on Appeal.

October 28, 2019



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