

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE
Court of Common Pleas
Charles B. Simmons, Jr., Master-in-Equity

Trial Case No.: 2019-CP-23-05580
Appellate Case No. 2020-000913

RECEIVED
JUL 27 2020
SC Court of Appeals

In re: Samuel Church, Debtor,

James Ray Smith and Suzuki of Anderson, Inc.,.....Respondents,

v.

Samuel Church,.....Appellant.

MEMORANDUM IN OPPOSITION TO MOTION FOR REINSTATEMENT

COMES NOW the Respondents and submit their Memorandum in Opposition to Appellant's Motion for Reinstatement.

STATEMENT OF THE CASE

Judgment was rendered in the above-entitled action on the 17th day of August, 2010 in favor of the Respondents and against Appellant, Samuel Church, in the sum of Two Hundred Thousand and 00/100 (\$200,000.00) Dollars, plus court costs, as awarded by the United States Bankruptcy Court as appears by reference to Consent Order of Nondischargeability Under 11 U.S.C. §523 filed in the Office of the United States Bankruptcy Court and filed in the Office of the Clerk of Court for

Greenville County, South Carolina in the Court of Common Pleas on September 24, 2019. To date, the judgment, with all accrued interest thereon, remains unpaid.

On September 27, 2019 an Execution against the property of the Appellant was issued to the Greenville County Sheriff's Office and same is being, or is expected to be, returned by the Sheriff's Office unsatisfied and marked "*nulla bona.*"

On December 9, 2019, the Honorable Charles B. Simmons, Jr., Master-in-Equity for Greenville County, South Carolina issued an Order requiring the Appellant to present to the Court for the purpose of allowing Respondents to examine the Appellant, under oath, concerning any assets which he may own (or which he once owned) in order to locate and ascertain the financial assets of the Appellant for the purpose of satisfaction of judgment obtained against the said Appellant.

A hearing was held on January 27, 2020 before the Honorable Charles B. Simmons, Jr. Appellant testified under oath at the hearing. Appellant failed to produce prior to the hearing, as required by the Order for Supplemental Proceedings, a number of financial records as directed by the Order. At the conclusion of the hearing, Appellant was Ordered to provide additional records to the Respondents, Respondents were allowed to conduct discovery into the Appellant's assets, and the record was left open by the Court to receive such additional evidence.

During the process of obtaining additional evidence, Respondents caused to be issued subpoenas to Appellant's daughter, Emma Loyal, a resident of Georgia. Appellant moved to quash the subpoenas issued by the Clerk of Court for Fulton County, Georgia. A hearing was held on May 27, 2020 at the conclusion of which Judge Simmons denied Appellant's Motion to Quash. This Appeal followed.

ARGUMENT

I. The Order denying Appellant's Motion to Quash is interlocutory, is a ruling on a discovery motion, and is not immediately appealable.

As cited by this Court in its Order dismissing Appellant's Appeal, the appeal filed by Appellant arises out of an order of the Circuit Court denying Appellant's Motion to Quash a subpoena. It is well settled in South Carolina that discovery orders are interlocutory and are not immediately appealable. *Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241, 439, S.E.2d 852, 853 (1994).

Because the underlying order was issued in regard to a discovery motion, the Court properly dismissed the Appeal.

II. On June 19, 2020 Respondents *withdrew* the subpoenas served upon Appellant's daughter, Emma Loyal, making the Appeal moot.

Due to the limited amount of time within which Respondents have to complete Supplemental Proceedings (i.e., Judgment was entered on August 17, 2010, and the 10-year enforcement period will expire on August 17, 2020...unless extended by this Court), Respondents elected, on June 19, 2020, to withdraw the subpoenas issued by the Clerk of Court for Fulton County, Georgia and served upon Emma Loyal. By letter of said date, copied to Appellant's attorney and the Clerk of Court of Fulton County, Georgia, Respondents withdrew the subpoenas making the Appeal filed by the Appellant moot. See Letter of June 19, 2020 attached hereto as Exhibit A.

III. Appellant's filing of the within Appeal and Motion for Reinstatement were filed for the purpose of delay, were filed in bad faith, and are a purposeful effort by Appellant to run out the time for enforcement of the judgment.

As is more fully set forth above, the Judgment at issue in this matter was entered (by consent of the Appellant) against Appellant on August 17, 2010. The 10-year enforcement period will therefore expire on August 17, 2020 unless same is extended by this Court.

Respondents began what will likely be their final effort to enforce their Judgment against the Appellant in September 2019. Appellant, with the assistance of counsel, has made every effort to delay or frustrate Respondents' ability to determine the assets of the Appellant including the following:

On December 31, 2019, Sam Church created the Samuel T. Church Living Trust.

On December 31, 2019, Sam Church transferred all of his right, title and interest in all of my tangible personal property including, all of my jewelry, clothing, household furniture, furnishings, and fixtures, chinaware, silver, photographs, works of art, books, sporting goods, electronic equipment, musical instruments, artifacts relating to my hobbies, and all other tangible articles of personal property that I now own or later acquire, regardless of how they are acquired or the record title in which they are held" into his Trust.

On January 15, 2020, Sam Church transferred his ½ interest in the real property at 15 Spruce Street, Greenville, SC into his Trust.

On February 29, 2020, Dailorem, LLC, a South Carolina Limited Liability Company is formed with the SC Secretary of State. Sam Church is the Registered Agent for the Company.

On March 2, 2020, Sam Church, as sole Member of Dailorem, LLC, transfers all of his membership interest in Dailorem, LLC into his Trust.

On March 19, 2020, Sam Church transferred any and all ownership in Capital One Savings Account Number 36096770471 into his Trust (allegedly containing \$20.00 at that time).

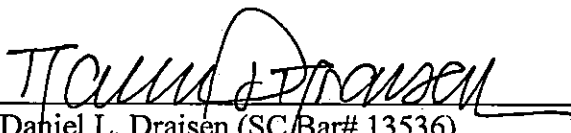
All documents supporting the within timeline are attached hereto and incorporated by reference thereto as Exhibit B.

Respondents assert that the transfers made by Appellant into the Samuel T. Church Living Trust dated December 31, 2019 were fraudulent, were made during the pendency of these supplemental proceedings, and were done in an effort to avoid the collection of Respondents' Judgment.

CONCLUSION

By filing the within Appeal, and now a Motion to Reinstate the Appeal, Appellant has effectively deprived the Circuit Court of jurisdiction over this matter until such time as the matter is remanded to the Circuit Court, all in an effort to thwart Respondents' collection efforts. Accordingly, Appellant's Motion to Reinstate should be promptly denied, the matter remanded to the Circuit Court, and Respondents should be afforded an opportunity to complete the pending Supplemental Proceedings.

Respectfully Submitted,


Daniel L. Draisen (SC Bar# 13536)
The Injury Law Firm, PC
2006 North Main Street
Anderson, South Carolina 29621
(864) 888-8887
Attorney for Respondents

July 24, 2020

Other Counsel of Record:

Joseph S. Lyles, Esq.
The Lyles Law Firm, LLC
P.O. Box 915
Travelers Rest, SC 29690
(864) 834-8111
Attorney for Appellant

EXHIBIT A



2006 N. MAIN STREET
ANDERSON, SOUTH CAROLINA 29621
(864) 888-8887
daniel@injuredSC.com
www.injuredSC.com

DANIEL L. DRAISEN, ESQ.
*Licensed in SC and OK

June 19, 2020.

VIA E-MAIL AND US MAIL

Hon. Charles B. Simmons, Jr.
Greenville County Courthouse, Suite 313
305 E. North Street
Greenville, SC 29601

RE: SMITH V. CHURCH
C/A No. 2019-CP-23-5580

Dear Judge Simmons:

Please be advised that Mr. Smith hereby withdraws the Subpoenas issued by the Fulton County, Georgia, Clerk of Court and served on Emma Loyal *without* prejudice. The decision to withdraw these Subpoenas is made solely due to the alleged threats to the health and safety of Mrs. Loyal stemming from the COVID-19 pandemic that were asserted by her attorneys.

By copy of this letter I am notifying attorney Lyles, attorney Steve Hardy in Georgia, and the Fulton County Clerk of Court of the withdrawal of these subpoenas.

I trust that by the withdrawal of the Subpoenas Mr. Lyles appeal regarding same is now rendered moot. Accordingly, I would ask that the Court set a hearing on Plaintiffs' Motion to Appoint Receiver at the Court's earliest convenience.

With kind regards,

THE INJURY LAW FIRM, P.C.


Daniel L. Draisen

DLD

cc: Joseph S. Lyles, Esq.
Steven W. Hardy, Esq.
Fulton County Clerk of Court
James Ray Smith



LIFE MEMBER
MILLION DOLLAR ADVOCATES FORUM
"The Top Trial Lawyers in America"



EXHIBIT B

**Certification of Trust for the
SAMUEL T. CHURCH Living Trust**

Dated December 31, **20** 19

Pursuant to South Carolina Trust Code, this Certification of Trust is signed by all the currently acting Trustees of the SAMUEL T. CHURCH Living Trust dated December 2019, who declare: 31

1. The Grantor of the trust is SAMUEL T. CHURCH. The trust is revocable by the Grantor.
2. The Trustee of the trust is SAMUEL T. CHURCH.
3. The tax identification number of the trust is the Social Security number of SAMUEL T. CHURCH.
4. Title to assets held in the trust will be titled as:

SAMUEL T. CHURCH Trustee, or his successors in interest, of the
SAMUEL T. CHURCH Living Trust dated December 31 2019, as
amended.
5. An alternative description will be effective to title assets in the name of the trust or to designate the trust as a beneficiary if the description includes the name of at least one initial or successor Trustee, any reference indicating that property is being held in a fiduciary capacity, and the date of the trust.
6. Excerpts from the trust document that establish the trust, designate the Trustee, and set forth the powers of the Trustee will be provided upon reasonable request of someone with a need to know. The powers of the Trustee include the power to acquire, sell, assign, convey, pledge, encumber, lease, borrow, manage, and deal with real and personal property interests.
7. The terms of the trust provide that a third party may rely upon this Certification of Trust as evidence of the existence of the trust and is specifically relieved of any obligation to inquire into the terms of this trust or the authority of my Trustee, or to see to the application that my Trustee makes of funds or other property received by my Trustee.
8. The trust has not been revoked, modified, or amended in any way that would cause the representations in this Certification of Trust to be incorrect.

December 31, 20 19



Samuel T. Church, Trustee

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

ACKNOWLEDGEMENT

I Pamela D. Helton, a notary public for South Carolina, do hereby certify that the within named, SAMUEL T. CHURCH, Affiant, did personally appear before me this day and acknowledge the due execution of the foregoing instrument.

Sworn to before me this December 31, 2019.



Notary Public of South Carolina

My commission expires: 11-15-2026

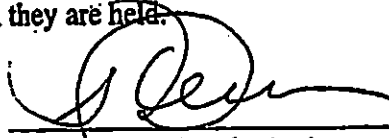
Assignment of Personal Property

For value received I SAMUEL T. CHURCH of Greenville, South Carolina, assign, transfer, and convey to:

SAMUEL T. CHURCH, Trustee, or his successors in interest, of the SAMUEL T. CHURCH Living Trust dated December 31, 2019, as amended

all of my right, title, and interest in all of my tangible personal property. My tangible personal property includes all of my jewelry, clothing, household furniture, furnishings and fixtures, chinaware, silver, photographs, works of art, books, sporting goods, electronic equipment, musical instruments, artifacts relating to my hobbies, and all other tangible articles of personal property that I now own or later acquire, regardless of how they are acquired or the record title in which they are held.

Dated: December 31, 2019



Samuel T. Church, Assignor

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

ACKNOWLEDGEMENT

I Pamela D. Helton, a notary public for South Carolina, do hereby certify that the within named, SAMUEL T. CHURCH, Affiant, did personally appear before me this day and acknowledge the due execution of the foregoing instrument.

Sworn to before me this December 31, 2019



Notary Public of South Carolina

My commission expires: 11-15-2026

This instrument was prepared by:
Joseph S. Lyles, Esq.
20 S. Poinsell Hwy., Ste. A
Travelers Rest, SC 29690

TITLE TO REAL ESTATE – DEED TO TRUST

THIS DEED IS DRAFTED WITHOUT THE BENEFIT OF A TITLE SEARCH, ABSTRACT, OR OPINION OF TITLE. NO WARRANTY OR OPINION OF TITLE, EXPRESS OR IMPLIED, IS GIVEN.

State of SOUTH CAROLINA
County of GREENVILLE

KNOW ALL MEN BY THESE PRESENTS that, on this 15th day of January, 2020, SAMUEL CHURCH, in consideration of ONE (\$1.00) DOLLAR(S) love and affection, as valuable consideration, the receipt of which is hereby acknowledged, has granted, bargained, sold, released, and transferred unto SAMUEL T. CHURCH, Trustee, or his successors in interest, of the SAMUEL T. CHURCH LIVING TRUST dated December 31, 2019, as amended, forever.



All his interest (one-half) in that piece, parcel or lot of land, lying and being in the COUNTY OF GREENVILLE, STATE OF SOUTH CAROLINA, being known and designated as: (See EXHIBIT A Attached Hereto for Legal Description and Derivation)

Together with all and singular the rights, members, hereditaments and appurtenances to said premises belonging or in any wise incident or appertaining; to have and to hold all and singular the premises before mentioned unto the grantee(s), and the grantee's(s') heirs or successors and assigns, forever. And, the grantor(s) do(es) hereby bind the grantor(s) and the grantor's(s') heirs or successors, executors and administrators.

GREENVILLE Co. TMS#: 0192000100700 Grantee Address: 15 Spruce St.
Greenville, SC 29607

This conveyance is made subject to all restrictions, easements, rights of way, setback lines, roadways, and zoning ordinances, if any, of record on the recorded plat(s), or on the premises affecting said property.

WITNESS the grantor's(s') hand(s) and seal(s) this 15th day of January, 2020. Signed, sealed, and delivered in the presence of:


Signature of Disinterested Witness 1

Signature of Disinterested Witness 2


Signature of Grantor. SAMUEL CHURCH

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

ACKNOWLEDGEMENT

I, Pamela D. Helton, a notary public for South Carolina, do hereby certify that the within named, SAMUEL CHURCH, Grantor, did hereby personally appear before me this day and acknowledge the due execution of the foregoing instrument.

Sworn to before me this 15th day of January, 2020.



Notary Public of South Carolina
My commission expires: 11-15-2026

EXHIBIT A

All that certain piece, parcel, or lot of land with all improvements thereon, or hereinafter constructed thereon, situate, lying and being in the County of Greenville, State of South Carolina and being shown and designated as a Portion of Lot No. 38 on plat of Overbrook Land Company, which is recorded in the Register of Deeds Office for Greenville County in Plat Book E at Pages 251 and 252, and being shown on a more recent survey for Cameron E. Smith and Joan B. Smith dated October 20, 1986 and recorded in the Register of Deeds Office for Greenville County in Plat Book 13-K at Page 47. Reference to said latter plat is hereby made for the metes and bounds, courses and distances as upon said plat appear. Said plat is incorporated herein by reference thereto.

TMS No. 0192000100700

This being the same property conveyed to the grantor herein by Deed of Paula Williamson Church and John Williamson dated October 30, 2014, and recorded on November 4, 2014, in Deed Book 2454 at Page 2423 in the ROD Office for Greenville County.


This conveyance is made subject to any restrictions, reservations, zoning ordinances or easements that may appear of record on the recorded plats or on the premises.

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE


Affidavit

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this affidavit and I understand such information.
2. The property being transferred is located at 15 Spruce St., Greenville, SC 29607, bearing Greenville County Tax Map Number 0192000100700, was transferred by Samuel Church to Samuel T. Church, Trustee on 01/15/2020.
3. Check one of the following: The deed is
 - (a) _____ subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 - (b) _____ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
 - (c) exempt from the deed recording fee because (see information section of affidavit): exemption #8 below (If exempt, please skip items 4 - 7 and go to item 8 of this affidavit.)
4. Check one of the following if either item 3(a) or item 3(b) above has been checked (see information section of this affidavit):
 - (a) _____ The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of _____.
 - (b) _____ The fee is computed on the fair market value of the realty which is _____.
 - (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is _____.
5. Check Yes _____ or No _____ to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If "yes" the amount of the outstanding balance of this lien or encumbrance is: _____.
6. The deed recording fee is computed as follows:
 - (a) Place the amount listed in item 4 above here: _____
 - (b) Place the amount listed in item 5 above here: _____
(If no amount is listed, place zero here)
 - (c) Subtract line 6(b) from line 6(a) and place result here: _____
7. The deed recording fee due is based on the amount listed on line 6(c) above and the deed recording fee due is: _____.
8. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Grantor.
9. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.


Responsible Person Connected with the Transaction

Samuel Church
Print or Type Name Here

SWORN to before me this 15th
day of January, 2020

Notary Public for South Carolina
My Commission Expires: 11/15/2026

INFORMATION

Except as provided in this paragraph, the term "value" means "the consideration paid or to be paid in money or money's worth for the realty." Consideration paid or to be paid in money's worth includes, but is not limited to, other realty, personal property, stocks, bonds, partnership, interest and other tangible property, the forgiveness or cancellation of a debt, the assumption of a debt, and the surrendering of any right. The fair market value of the consideration must be used in calculating the consideration paid in money's worth. Taxpayers may elect to use the fair market value of the realty being transferred in determining fair market value of the consideration. In the case of realty transferred between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, and in the case of realty transferred to a trust or as a distribution to a trust beneficiary, "value" means the realty's fair market value. A deduction from value is allowed for the amount of any lien or encumbrance existing on the land, tenement, or realty before the transfer and remaining on the land, tenement, or realty after the transfer. Taxpayers may elect to use the fair market value for property tax purposes in determining fair market value under the provisions of the law.

Exempted from the fee are deeds:

- (1) transferring realty in which the value of the realty, as defined in Code Section 12-24-30, is equal to or less than one hundred dollars;
- (2) transferring realty to the federal government or to a state, its agencies and departments, and its political subdivisions, including school districts;
- (3) that are otherwise exempted under the laws and Constitution of this State or of the United States;
- (4) transferring realty in which no gain or loss is recognized by reason of Section 1041 of the Internal Revenue Code as defined in Section 12-6-40(A);
- (5) transferring realty in order to partition realty as long as no consideration is paid for the transfer other than the interests in the realty that are being exchanged in order to partition the realty;
- (6) transferring an individual grave space at a cemetery owned by a cemetery company licensed under Chapter 33 of Title 39;
- (7) that constitute a contract for the sale of timber to be cut;
- (8) transferring realty to a corporation, a partnership, or a trust in order to become, or as, a stockholder, partner, or trust beneficiary of the entity provided no consideration is paid for the transfer other than stock in the corporation, interest in the partnership, beneficiary interest in the trust, or the increase in value in such stock or interest held by the grantor. However, the transfer of realty from a corporation, a partnership, or a trust to a stockholder, partner, or trust beneficiary of the entity is subject to the fee even if the realty is transferred to another corporation, a partnership, or trust;
- (9) transferring realty from a family partnership to a partner or from a family trust to a beneficiary, provided no consideration is paid for the transfer other than a reduction in the grantor's interest in the partnership or trust. A "family partnership" is a partnership whose partners are all members of the same family. A "family trust" is a trust, in which the beneficiaries are all members of the same family. The beneficiaries of a family trust may also include charitable entities. "Family" means the grantor and the grantor's spouse, parents, grandparents, sisters, brothers, children, stepchildren, grandchildren, and the spouses and lineal descendants of any the above. A "charitable entity" means an entity which may receive deductible contributions under section 170 of the Internal Revenue Code as defined in Section 12-6-40(A);
- (10) transferring realty in a statutory merger or consolidation from a constituent corporation to the continuing or new corporation;
- (11) transferring realty in a merger or consolidation from a constituent partnership to the continuing or new partnership; and
- (12) that constitute a corrective deed or a quitclaim deed used to confirm title already vested in the grantee, provided that no consideration of any kind is paid or is to be paid under the corrective or quitclaim deed;
- (13) transferring realty subject to a mortgage to the mortgagee whether by a deed in lieu of foreclosure executed by the mortgagor or deed executed pursuant to foreclosure proceedings;
- (14) transferring realty from an agent to the agent's principal in which the realty was purchased with funds of the principal, provided that a notarized document is also filed with the deed that establishes the fact that the agent and principal relationship existed at the time of the original purchase as well as for the purpose of purchasing the realty;
- (15) transferring title to facilities for transmitting electricity that is transferred, sold, or exchanged by electrical utilities, municipalities, electric cooperatives, or political subdivisions to a limited liability company which is subject to regulation under the Federal Power Act (16 U.S.C. Section 791(a)) and which is formed to operate or to take functional control of electric transmission assets as defined in the Federal Power Act.





2020003249

8 Pgs

DEED Book: DE 2888 Page: 1748 - 1752
January 15, 2020 09:09:10 PM Cons: \$1.00
Rec: \$15.00 Cnty Tax: EXEMPT State Tax: EXEMPT
E-FILED IN GREENVILLE COUNTY, SC

Timothy J. Ramsey

ASSIGNMENT

The undersigned hereby assigns and conveys any and all ownership interest in Capital One Savings Account Number 36096770471 to the Samuel T. Church Living Trust dated December 31, 2019.

Samuel T. Church, Jr.
Samuel T. Church

Date: March 19, 2020

Witnessed: [Signature]

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF GREENVILLE

C.A. No. 2019-CP-23-05580

James Ray Smith and
Suzuki of Anderson, Inc.,

Plaintiffs,

INVENTORY AND ACCOUNTING
(Samuel Church Living Trust)

vs.

Samuel Church,

Defendant.

Re: Subpoena dated 02-21-20

I. Assets

1. Church Home - Samuel Church's 1/2 interest
2. DAILOREM, LLC
3. Savings Accounts
 - a. Capital One Savings Account, balance \$20.00

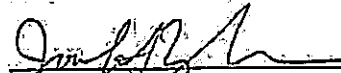
II. Documents:

1. Assignments
2. Deed

III. No assets were transferred to the Trust prior to January 15, 2020.

THE LYLES LAW FIRM, LLC

By:



Joseph S. Lyles
S.C. Bar #3462
P.O. Box 915
Travelers Rest, SC 29690
(864) 834-8111
(864) 610-2033 (fax)
Attorney for Defendant

March 19, 2020
Travelers Rest, SC

South Carolina Secretary of State

Business Entities Online

File, Search, and Retrieve Documents Electronically

DAILOREM, LLC

Corporate Information

Entity Type: Limited Liability Company

Status: Good Standing

Domestic/Foreign: Domestic

Incorporated South Carolina
State:

Important Dates

Effective Date 02/29/2020

Expiration N/A
Date:

Term End 12/31/2099
Date:

Dissolved N/A
Date:

Registered Agent

Agent: Sam Church

Address: 15 Spruce Street
Greenville, South Carolina 29607

Official Documents On File

Filing Type	Filing Date
Articles of Organization	02/29/2020

For filing questions please contact us at 803-734-2158

Copyright © 2020 State of South Carolina

ASSIGNMENT

The undersigned sole Member of the DAILOREM, LLC, hereby assigns and conveys any and all ownership interest, known as membership, in and to DAILOREM, LLC, to the Samuel T. Church Living Trust dated December 31, 2019



Samuel T. Church, Member

Date: 3/2/20

Witnessed: Katie Joner

Notary: [Signature]
3/2/20



THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE
Court of Common Pleas
Charles B. Simmons, Jr., Master-in-Equity

Trial Case No.: 2019-CP-23-05580
Appellate Case No. 2020-000913

RECEIVED
JUL 27 2020
SC Court of Appeals

In re: Samuel Church, Debtor,

James Ray Smith and Suzuki of Anderson, Inc.,.....Respondents,

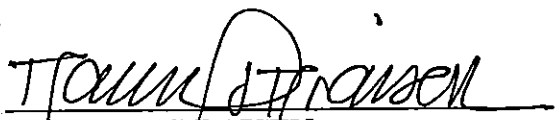
v.

Samuel Church,.....Appellant.

PROOF OF SERVICE

I hereby certify that I have served a copy of the Respondents' Memorandum in Opposition to Motion for Reinstatement and Proof of Service upon Joseph S. Lyles, Esq., attorney for Appellant, by depositing a copy of same in the United States Mail, postage prepaid, on July 24, 2020 addressed as follows:

Joseph S. Lyles, Esq.
The Lyles Law Firm, LLC
P.O. Box 915
Travelers Rest, SC 29690


DANIEL L. DRAISEN
2006 North Main Street
Anderson, South Carolina 29621
(864) 888-8887
ATTORNEY FOR THE RESPONDENTS



2006 N. MAIN STREET
ANDERSON, SOUTH CAROLINA 29621
(864) 888-8887
daniel@injuredSC.com
www.injuredSC.com

DANIEL L. DRAISEN, ESQ.
*Licensed in SC and OK

July 24, 2020

RECEIVED
JUL 27 2020
SC Court of Appeals

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211


RE: James Ray Smith and Suzuki of Anderson, Inc., Respondents v. Samuel Church, Appellant
Case No. 2020-000913

Dear Ms. Kitchings:

Please find enclosed for filling the Original of Respondents' Memorandum in Opposition to Motion to Reinstate along with six (6) copies. Also enclosed is the Proof of Service of the Memorandum on the Appellant.

Sincerely yours,

THE INJURY LAW FIRM, PC


Daniel L. Draisen

DLD
Enclosures
cc: Joseph S. Lyles, Esq.




LIFE MEMBER
MILLION DOLLAR ADVOCATES FORUM
The Top Trial Lawyers In America™





RECEIVED
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 THE INJURY LAW
FIRM, L.L.C.
2006 North Main Street
Anderson, South Carolina 29621

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Clerk, South Carolina Court of Appeals
Post office Box 11629
Columbia, South Carolina 29211