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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable? Mikell Scarborough and
The Honorable? Maite Murphy

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SC Court of Appeals

Case No. 2017-CP-10-04031 and
2014-CP-10-05407

Appellate Case No. 2020-001304

Alan G. Nix, Norma J. Nix and the Estate of Norma J. Nix,

Appellants,

v.

Churchill Park,

Respondent,

Appellate Case Number 2020-001304

**APPELLANT'S SECOND MOTION FOR EMERGENCY STAY OF SALE OF
PROPERTY, ORDER TRANSCRIPT LATE (IF NECESSARY), CLARIFY
DEFICIENCY ORDER OF 6 OCTOBER 2020, ADD ORIGINAL PARTIES BACK TO
APPEAL**

Exhibits attached to this motion and, by inclusion, are incorporated into the motion by reference.

1. Documents that are apparently testimony taken by a Charleston County Master in Equity on 20 August 2020 pursuant to SC Code 14-11-110. Received by Alan Nix on 28 October 2020.
2. Copy of Letter from this Court dated 6 Oct 2020, received 14 October 2020, which says it is a deficiency letter.
3. Amended Certificate of Service for cases 2014-CP-10-05407 and 2017-CP-10-04031 which Alan Nix attempted to file with Ms. Armstrong's Office on 28 October 2020, but couldn't....
4. Copy of Yellow Sheet from Ms. Armstrong's office Appellant Alan Nix received back from Ms. Armstrong with the motion filed 26 Oct 2020 on 31 October 2020. A copy of the same motion was filed with this court on 22 Oct 2020.

BACKGROUND

The Appellants filed a Notice of Appeal in this case on 24 September 2020. The Appellants filed a Motion to Stay the Sale of the Appellants' family home on 5 October 2020 and the Respondent's filed an answer to the Motion to Stay on 5 October 2020 requesting the Appellant's Motion be denied because Appellants' had not tried to file a Motion to Set a Bond and Stay the Sale in the lower court. This Court granted Respondent's Motion to deny Appellant's Motion to Stay the Sale with an Order dated 13 October 2020 citing the fact that Appellant's had not made a motion to Stay the Sale and request a Bond in the lower Court. This Court, for reasons Appellants' do not logically understand, apparently believed the Charleston County Clerk of Court / Public Official Armstrong, would treat Appellant's Motion to Stay the Sale of their family home and set a bond differently than Appellants' two Rule 59 motions that Ms. Julie Armstrong, the Charleston County Clerk of Court, sent back to Appellants' on 21 September 2020. The motions and Ms. Armstrong's return documents were attached to the Notice of Appeal. Ms. Armstrong's denial to file these two Rule 59 motions is exactly what led to this very appeal being filed on 24 September 2020.

However, in an attempt to provide sufficient proof of the complete illogicalness of McCabe, Musheff and Trotter's argument, which this Court apparently agreed with by filing the 13 October 2020 Order granting their request to deny, Appellants' took McCabe Musheff and Trotter's and this Court's challenge to heart and filed a motion vis USPS Express Mail on the morning of 26 October 2020 with the Charleston County Clerk of Court / Ms. Julie Armstrong, which, unsurprisingly, Appellants' received back from Ms. Armstrong yesterday, once again, but less obviously, citing Judge Murphy's "Enjoin Order" in case 2018-CP-10-03315 as the reason they can't file any documents in cases 2014-CP-10-05407 and 2017-CP-10-0403. See **Exhibit 4**.

As additional proof, Appellants' attempted to file an amended Certificate of Service (See **Exhibit 3**) in cases 2017-CP-10-04031 and 2014-CP-10-05407 late afternoon this past Wednesday and Ms. Armstrong's Office refused to file the Amended Certificate of Service, once again citing Judge Maite Murphy's Order dated 27 September 2019, for case 2018-CP-10-03315, entitled ORDER ENJOINING THE PLAINTIFF FROM RE-FILING THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF as the reason they cannot file any documents in cases 2014-CP-10-05407 and 2017-CP-10-04031 unless it is filed by one of those attorneys licensed to practice law in South Carolina. The lady that is under Ms. Armstrong's supervision as a Public Official, who would not provide her name, quickly provided Alan Nix with a copy of Judge Murphy's "Enjoin Order" of 29 September 2019 in case 2018-CP-10-03315 at approximately 1637 on 28 October 2020 and further clarified, for the first time to Alan Nix, that Judge Murphy had provided Ms. Armstrong's Office a verbal explanation of her "Enjoin Order". However, when Alan Nix asked Public Official Armstrong's employee who refused to provide her name for the date Judge Maite Murphy provided this verbal explanation and who was present for this verbal explanation, Public Official Armstrong's employee who refused to identify herself suddenly couldn't remember who was present at Judge Murphy's verbal explanation session of her obviously and easily known factually very badly flawed "Enjoin Order". Given this situation, Appellant Alan Nix is in the process of setting up, hopefully willingly, a deposition of Judge Maite Murphy, to have her provide the same explanation of her "Enjoin Order" under Oath and on camera as she provided to Public Official Armstrong and her employees at some time in the last thirteen or so months. Obviously Judge Maite Murphy's

deposition on this matter should be of great value to multiple future legal proceedings and currently ongoing cases.

As it relates to Ms. Abbott-Kitching's letter dated 19 October 2020, which was not received by Appellant Alan Nix until 29 October 2020, this Motion is also responsive to that letter. First, Ms. Abbott-Kitchings, a clarification of when this letter was actually placed in the US Postal Service Mail is required. It appears that either the USPS is suffering significant delays in processing regular mail OR the letter dated 19 October 2020 was not actually placed in the USPS mail until at least 23 October 2020, if not later. Second, since the motion filed with this court on 22 October 2020 lays out some significant problems with Scarborough's jurisdiction of case 2017-CP-10-04031, not to mention the improper enabling conduct by Public Official Armstrong and Charleston County, clearly asking an employee of Charleston County to provide a transcript of those proceedings is improper. Hence, please coordinate with Ms. Kohn to have a Court Reporter from Court Administration provide whatever transcript is required. To clarify, there is a remote possibility that **Exhibit 1** is actually and legally the transcript of testimony taken by a Charleston County Master in Equity on 20 August 2020 pursuant to SC Code 14-11-110. If so, then **Exhibit 1** is the transcript you demand in your letter dated 19 October 2020, but curiously not received until at least late on 28 October 2020 at the earliest.

Likewise related Ms. Abbott-Kitchings, please see **Exhibit 2**, an apparent deficiency letter from someone with a first name of Catherine and a last name that starts with an "H". This letter, dated 6 October 2020, but once again not received by Alan Nix until 14 October 2020, eight days later, states that the apparent deficiency must be corrected within ten days of the date of this letter, or the appeal will be dismissed. Shouldn't the appeal have been dismissed on Friday, 16 October 2020 before you sent the letter dated 19 October 2020? Further, and even more curiously, Ms. Catherine "H" states as a fact that "The appeal of the September 27, 2019 order in case 2018-CP-10-03315 is not timely served. Accordingly, this appeal will proceed without consideration of this order". Even though this is stated as a deficiency, it:

1. Operates as an Order doesn't it?
2. States as a fact something that Ms. Catherine "H" does not support with a single fact in support of her assertion.

Please clarify what evidence Ms. Catherine "H" is apparently referring to in this apparent deficiency letter which operates as an Order. Assuming no such evidence is produced in this matter, please provide a revised letter / Order for Ms. Catherine "H"'s letter Order. Given that Public Official Armstrong, the Charleston County Clerk of Court, has once again utilized Judge Maity Murphy's "Enjoin Order" from case 2018-CP-10-03315 AGAIN to refuse to file a motion in cases 2014-CP-10-05407 and 2017-CP-10-04031, clearly these parties MUST be added back to this appeal regardless of Ms. Catherine "H"'s assertions. As you can see from the Certificate of Service, they are all copied on this motion as well.

Appellant requests the Court of Appeals, in light of the now clear and indisputable evidence of the impossibility of Appellants' to file any motions in cases 2014-CP-10-05407 and 2017-CP-10-04031 without having Public Official Armstrong send it back with one of those colored sheets saying something about having to involve one of those attorneys that belongs to an Association which licenses them to practice law in South Carolina, to grant an emergency stay related to the sale of Appellants' property, an injunction against Respondent and accomplices Charleston County, Scarborough, etc. related to taking any further action in these cases, and a granting a change of venue of these cases to prevent more improper delays, risks and costs from being incurred by Appellants'.

WHEREFORE, Appellants respectfully requests this Court:

1. Stay the sale of the subject property which is now clearly required of the Court of Appeals due to the shenanigans of Murphy, Charleston County, Public Official Armstrong and numerous of those attorneys that are licensed to practice law in South Carolina.
2. Enjoin Charleston County and Scarborough from taking any further action related to the subject property and Defendants / Appellants.
3. Toll the Statute of Limitations related to all matters which could and should be validly asserted but cannot be due to Judge Murphy's Order dated 27 September 2019, for case 2018-CP-10-03315, entitled ORDER ENJOINING THE PLAINTIFF FROM RE-FILING THIS MATTER AND IMPOSING SANCTIONS UPON THE PLAINTIFF and Public Official Armstrong, Charleston County's and Scarborough's knowing and willful improper conduct in these matters.


4. Clarify and correct the Order letter of 6 October 2020.
5. Notify Appellants' if Exhibit 1 is responsive to Ms. Abbott-Kitching's demands
6. Have Court Administration take over any other transcript responsibilities from Charleston County.
7. Clarify any USPS mailing orders the Court of Appeals is, and has been, experiencing and all actions they have taken with regards to the same.
8. Any other and further relief as the Court deems just, prudent and proper.

November 1, 2020


Respectfully submitted,



Alan G. Nix (individually)
1401 Densmore Circle
Mount Pleasant, SC 29466
(843) 991-4170



Alan G. Nix (as co-PR for Estate of Norma J. Nix)
1401 Densmore Circle
Mount Pleasant, SC 29466
(843) 991-4170



Ethan Nix, co-PR for Estate of Norma J. Nix
1784 Walhalla Hwy.
Pickens, SC 29671
(864) 419-8654

Exhibit

1

Physical Address:
4500 Fort Jackson Blvd.
Suite 250
Columbia, South Carolina
29209

Mailing Address:
Post Office Box 212069
Columbia, SC 29221

Locations in:
Mount Pleasant, SC
Myrtle Beach, SC



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COMMUNITY ASSOCIATION AND CONSTRUCTION LAW

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Stephanie Trotter Kellahan
Shareholder

Stephanie.Kellahan@mccabetrotter.com

Alan G. Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

Ethan Nix
Personal Representative for Estate of Norma Nix
211 Posey Hill Road
Liberty, SC 29657

RE: Churchill Park v. Alan G. Nix and Estate of Norma J. Nix
Civil Action Number: 2017-CP-10-04031
Our File Number: 17990.00010

Dear Alan G. Nix and Ethan Nix, Personal Representative for Estate of Norma Nix,

Enclosed please find documents that have been e-filed on August 20, 2020 in this matter along with a certificate of service.

If you have any questions please contact us at 803-724-5002. Thank you.

Sincerely,
Stephanie Trotter Kellahan

**THIS COMMUNICATION IS FOR THE PURPOSE OF COLLECTING A DEBT. ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF CHARLESTON

Churchill Park,

Case No.: 2017-CP-10-04031

Plaintiff,

AFFIDAVIT OF ATTORNEYS FEES

v.

Alan Nix and the Estate of Norma Nix,

Defendants

017990:00025

PERSONALLY APPEARED before me Stephanie Trotter Kellahan, who, being first duly sworn and cautioned deposes and says as follows:

1. Deponent is an attorney licensed to practice law in the State of South Carolina and is a shareholder with the law firm of McCabe, Trotter & Beverly, P.C.
2. Deponent's law firm was retained by Plaintiff to file and foreclose a lien against Defendant's property for unpaid homeowners' association dues.
3. Plaintiff's counsel previously submitted an affidavit of attorney's fees showing entries through September 6, 2017. Since that time, Plaintiff has incurred attorneys' fees and costs in the amount of \$87,773.64. This amount does not include fees or costs attributable to Plaintiff's counsel work associated with the appeal in this matter.
4. Of that amount, \$978.64 is attributable to the costs incurred by Plaintiff since the original trial in this matter but excluding costs incurred in the appeal related to the same. \$86,795.00 is associated with work performed in preparation for trial, representation of Plaintiff during trial, post-trial motion practice, and post-appeal work through August 18, 2020. Plaintiff does not seek any fees or costs solely related to the appeal in this matter other than the amount already awarded by the South Carolina Court of Appeals.
5. The attorney's fees are based on an hourly rate for services provided in prosecuting the foreclosure action.

6. Plaintiff's contract with Deponent provides for an hourly fee where a foreclosure action is contested or includes defense of counterclaims. Attached hereto as Exhibit A is a billing summary showing the detailed hourly time entries requested herein.

7. Under *Dede v. Strickland*, 414 S.E.2d. 134 (S.C. 1992), the Supreme Court of South Carolina has set forth the factors to be considered in an award of attorney's fees in real property actions. These factors include nature, extent, and difficulty of the legal services rendered, the time and labor necessarily devoted to the case, the professional standing of counsel, the contingency of compensation, the customary fees charged in the locality for similar services, and the beneficial result obtained. These factors, as applied in this case, are as follows:

a. **Nature, Extent, and Difficulty of the Legal Services Rendered:** This is an action to foreclose an unpaid assessment lien on real property. The case involved complex issues of real property law raised by Plaintiff and both Defendants. The extent of the work performed was necessary to adequately prepare and try these matters, and the matters decided were of legal and factual difficulty.

b. **Time and Labor Necessarily Devoted to the Case:**

Deponent acknowledges that the time spent in this matter is extraordinarily higher than the amount of time typically spent in a homeowners' association foreclosure action. However, the time spent in this case has largely been the result of the actions of Defendant Alan Nix. Examples of such actions include:

- Mr. Nix has filed over 25 motions during the pendency of this matter with 21 of those motions coming after trial was held in September 2017. Most of these motions were frivolous and lacked any legal basis.
- As a result of Mr. Nix's filings, Plaintiff's counsel has made at least 9 court appearances in this matter as of August 18, 2020. At least 2 additional court appearances are expected to be required by the court.
- Mr. Nix issued 62 trial subpoenas that required Plaintiff's counsel's attention before and during trial.
- Mr. Nix issued approximately 62 post-trial subpoenas, resulting in this court's order enjoining him from issuing any further post-trial discovery without an attorney's approval.

- Mr. Nix has engaged in a pattern of harassment of Plaintiff and its counsel that includes sending multiple letters, many times more than one letter in a given week, addressed to counsel of record as well as other unrelated members of Deponent's law firm and various members of the judiciary and law enforcement. Mr. Nix has also sent over 300 emails to employees of McCabe Trotter & Beverly, PC between March 2016 and February 2020.
- At some point during the pendency of this case Defendant stopped directing any communication to Deponent and began directing all communication to former members of Deponent's firm or other attorneys within Deponent's firm who have never entered an appearance in this matter. This behavior required those attorneys to expend time to redirect the communication to Deponent.
- After a Charleston County magistrate entered a restraining order against Mr. Nix related to a dispute with his neighbors, Mr. Nix began sending emails and letters to Deponent's law firm and a multitude of other recipients warning that he was about to "exhibit" the same "erratic behavior" that gave rise to the restraining order.
- Mr. Nix also attacked Plaintiff and its counsel through collateral lawsuits and criminal allegations.
- Despite arguing that Plaintiff lacked the authority to enforce the restrictive covenants in place of the entity called Churchill Park Homeowners' Association, Inc., ("CPHOA") after trial Mr. Nix apparently appointed himself as the "acting president" of CPHOA and filed documents with the S.C. Secretary of State seeking to reinstate CPHOA from dissolved status and appointing himself as registered agent of CPHOA. Mr. Nix proceeded to mail multiple letters to his neighbors telling them he was the real HOA and they should attend his HOA meetings instead of those of Plaintiff. Mr. Nix also harassed various Plaintiff's various vendors by threatening them if they continued work within the neighborhood without authority of CPHOA.

While much of this behavior was patently frivolous, it nonetheless required Plaintiff's counsel spend time to review the actions to determine whether a response was necessary or appropriate.

- c. **Professional Standing of Counsel:** I am a licensed member of the Bar of the State of South Carolina and the Bar of the State of North Carolina. I completed law school in 2009. Since graduation, I have exclusively practiced community association law. I am a member of the Richland County Bar Association, the South Carolina Bar Association, the Community Law section of the South Carolina Bar, the South Carolina Chapter of the Community Association Institute and other professional organizations. Approximately 95% of my practice consists of real property litigation, including foreclosure cases, collection cases, and other related litigation. Accordingly, I submit that I have a high professional standing in general and in this area of practice.
- d. **Contingency of Compensation.** As recited above, compensation requested herein is based on an hourly fee arrangement.
- e. **Customary Fee Charged on the Locality for Similar Services.** I am aware from discussions with clients, other attorneys in the Foreclosure Bar in the state of South Carolina, and from my general familiarity with the legal profession that our hourly rate is well within the range of fees customarily charged in this locality for similar services.
- f. **Beneficial Results Obtained:** Plaintiff's counsel obtained the original Judgment enforcing Plaintiff's rights under the Declaration with regard to the subject real property. Plaintiff's counsel also obtained favorable rulings on the post-trial motions in this matter, thus preserving the judgment from attack by Defendant. Finally, Plaintiff's counsel obtained an appellate bond from Defendant, thus protecting Plaintiff during the appeal in this matter. Accordingly, it is submitted that beneficial results were obtained by this firm on the Plaintiffs' behalf.

8. The Plaintiff is seeking to recover its attorneys' fees and costs in the amount of \$87,773.64. Plaintiff reserves the right to request an award of fees for work performed that is not included in this affidavit, including but not limited to final preparation for and attendance at the supplemental hearing and all post-judgment actions in this matter.

FURTHER DEPONENT SAYETH NOT.

Stephanie Kellahan

Stephanie Trotter Kellahan
McCabe, Trotter & Beverly, PC
P.O. Box 212069
Columbia, South Carolina 29221
Phone: (803) 724-5000
Fax: (803) 724-5001
Email: stephanie.kellahan@mccabetrotter.com
Attorney for Plaintiff

Sworn to before me this 19
day of August, 2020

[Signature]
Notary Public for South Carolina
My Commission Expires: 02/10/2024

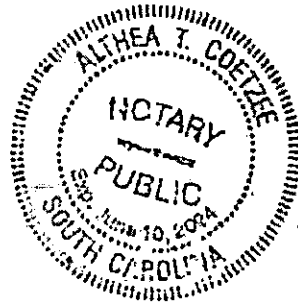


Exhibit A to Affidavit of Attorneys Fees of Stephanie Kellahan



McCABE, TROTTER & BEVERLY, P.C.
COMMUNITY ASSOCIATION AND CONSTRUCTION LAW

Churchill Park
Steven Grimes
Cedar Management Group
PO Box 26844
Charlotte, NC 28221

017990.00010: Nix, Alan G. & Norma J - 1401 Densmore Circle

Professional Fees	Hours	Rate	Amount
09/06/2017 DP Receipt & review of correspondence from Sally Newman of Charleston Legal Access to include Motion for Summary Judgment in 2014-CP-10-5407; Communicate with Attorney Musheff in regards to same; Update file accordingly.	0.10	125.00	12.50
09/06/2017 TM Communications with S. Newman concerning Ethan estates issue; communications with S. Newman regarding discovery and settlement and prepare for conference call with S. Newman on case issues and conduct call; communications with S. Newman concerning MSJ.	3.60	275.00	990.00
09/07/2017 TM Communication with Z. Perry regarding [REDACTED]; communications with Ryan McCabe, Board and Gold Crown regarding [REDACTED] and follow-up on same; communications with A. Nix regarding death of Norma and notice to court of same.	1.00	275.00	275.00
09/08/2017 TM Communications with Z. Perry and Ryan McCabe concerning [REDACTED].	0.40	275.00	110.00
09/10/2017 TM Attention to issues for [REDACTED] and preparing [REDACTED] Churchill Park.	0.50	275.00	137.50
09/11/2017 DP Receipt & review of Notice of Death of Defendant Norma J. Nix received via mail on 9/7/17; Communicate with Attorney Musheff in regards to same; update file accordingly.	0.20	125.00	25.00
09/11/2017 TM Return all communications and returned checks for banned on restrictions all in preparation for September 18, 2017, hearing; research [REDACTED] for hearing on Motion to Dismiss; begin drafting Brief opposing Motion to Dismiss.	2.80	275.00	770.00
09/12/2017 TM Communications with D. Peele concerning Notice of Death as to Norma Nix and follow-up with Park West Master on Nix issues.	0.40	275.00	110.00
09/12/2017 TM Drafting and research as to response to Motion for Summary Judgment.	2.40	275.00	660.00

PO Box 212069
Columbia, SC 29221

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09/13/2017 TM	<p>Communications with S. Newman concerning memorandum supporting MSJ and review and analyze memorandum and numerous exhibits and develop strategy options for response; communications with J. Wieringer concerning [REDACTED] and review and analyze and follow-up on same; communications with Z. Perry concerning [REDACTED]; begin drafting Zane Perry affidavit; discussion with Park West Master concerning [REDACTED]; communications with Z. Perry concerning [REDACTED].</p>	4.20	275.00	1,155.00
09/14/2017 DP	<p>Receipt and review of Defendant's Motion to Join Additional Parties which has now been filed with the Charleston County Clerk of Court; Communicate with Client in regards to same and update file accordingly.</p>	0.20	125.00	25.00
09/14/2017 TM	<p>Communications with Z. Perry and Board concerning [REDACTED] communication with Jennifer Williamson concerning [REDACTED] discussions with Jennifer Williamson regarding [REDACTED]; review and analyze Nix memo opposing summary judgment and numerous attachments; communications with A. Thornton concerning; Nix proceedings; communications with Z. Perry and Gold Crown regarding testimony, prepare affidavit of for Z. Perry concerning Churchill Park and various discussions regarding affidavit information and issues; prepare Assignment of Easement package for Z. Perry and follow-up to obtain notarized signature and communications with Jaime Wierings concerning affidavit and documents; communications with D. Peele concerning Motion to Join Parties and review and analyze same; communications with Jerric Gross regarding [REDACTED]. Communications with Z. Perry, Ryan McCabe and Gold Crown concerning [REDACTED]; communications with Jaime Wierings concerning [REDACTED]; communications with A. Nix and S. Newman concerning Z. Perry Affidavit; follow-up with Allen Thornton concerning [REDACTED]; follow-up with Board concerning [REDACTED].</p>	7.60	275.00	2,090.00
09/15/2017 TM	<p>Communications with T. Kapenke concerning [REDACTED]; communications with A. Nix concerning principal office for Churchill Park; preparation of response to S. Newman including outlining issues; research and drafting; communications with A. Nix regarding identity of notary on Z. Perry email, home purchase and case number; Communications with Allen Thornton concerning [REDACTED].</p>	7.70	275.00	2,117.50

09/16/2017	TM	Communications with A. Nix concerning Z. Perry affidavit and additional discovery; research and drafting and revising documents for response to Summary Judgment; communications with Z. Perry and Board concerning [REDACTED].	7.60	275.00	2,090.00
09/17/2017	TM	Complete research, document review and compilation for attachments and drafting of Brief opposing summary judgment and logistics for transmittal to Court; communications with Court and Defendants concerning Brief opposing summary judgment; communications with Board concerning [REDACTED]; communications with A. Nix concerning discovery and affidavits; communications with Z. Perry concerning [REDACTED].	8.70	275.00	2,392.50
09/18/2017	TM	Communications with J. Watson and Z. Perry concerning [REDACTED]; prepare for, travel to, participate in and return from pre-trial conference and hearing on various matters including Summary Judgment and Rule 19 Joinder of 8 parties; follow-up communications with clients and Gold Crown regarding hearing and settlement; prepare documents for A. Nix and S. Newman and travel to and return from post office to mail same; communications with Laura Duker Beck concerning case and Nix Issues; communications with Tiffini Allen [REDACTED].	9.20	275.00	2,530.00
09/19/2017	DP	Receipt and review of Prehearing Memorandum in Support of Motion for Summary Judgment w/ exhibits provided by Sally Newman of Charleston Legal Access; Communicate with Attorney Musheff in regards to said pleading; Update file accordingly.	0.10	125.00	12.50
09/19/2017	DP	Receipt & review of Memorandum in Opposition to Defendant's Motion for Summary Judgment by Alan Nix; Communicate with Attorney Musheff in regards to same; Update file accordingly.	0.10	125.00	12.50
09/19/2017	TM	Communication with Sally Newman concerning settlement; communication with D. Peele regarding Nix opposition to MSJ and review and analyze same; communication with D. Peele re: Ethan Nix estate memorandum; receive numerous documents from J. Watson concerning and review and analyze same; communication with T. Allen and J. Watson regarding [REDACTED].	3.60	275.00	990.00

09/20/2017	TM	Various communications with Sally Newman, T. Allen, J. Weirnga and J. Watson concerning [REDACTED]; prepare for settlement conference including various drafts of settlement agreements for different scenarios (payment plan, lump sum, maintenance issues); travel to and participate in settlement conference; attention to debt figure discrepancies; communication with Zane Perry and Board concerning [REDACTED]; communication with Andrew Lester of Woody Law Firm regarding subpoena; communication with Glenda concerning [REDACTED].	7.60	275.00	2,090.00
09/21/2017	DP	Review of current Charleston County Roster to find matter listed for Master/Trial week of 9/25-29/17; Update file and/or calendar accordingly.	0.10	125.00	12.50
09/21/2017	TM	Various settlement discussions with S. Newman, communications with Z. Perry concerning [REDACTED]; follow-up with Stephanie Trotter concerning [REDACTED]; review and analyze debt figures; draft Settlement Agreement and proposed Consent Order for defendants' consideration; review and analyze recent checks submitted by A. Nix to McCabe, Trotter & Beverly, F.C. with different names for HOA and restrictions. Review and analyze Nix subpoena to the Woody Firm; research Rule 45 objection options and draft proposed subpoena objections [REDACTED]; follow-up with Haylen concerning [REDACTED]; review and analyze Notice of Death of Norma Nix from Alan Nix as Personal Representative.	6.10	275.00	1,677.50
09/22/2017	TM	Various communications with Sally Newman and Alan Nix concerning discovery, case issues, trial and settlement; communication with Andrew McLasta concerning document subpoena and objectives; communications with Stephanie Trotter concerning [REDACTED]; communications with Glenda concerning [REDACTED]; drafting consent order for settlement option; attention to demonstrative accounting and issues raised by same.	4.80	275.00	1,320.00
09/23/2017	TM	Trial preparation and review of financials; communication with Z. Perry concerning [REDACTED]; calculate and develop settlement offer to allow Nix to settle [REDACTED] trial preparation.	6.80	275.00	1,870.00

09/24/2017 TM	Discussions with Z. Perry regarding [REDACTED] communication with C. Sumner and D. Brown concerning [REDACTED] review and analyze subpoenas; begin drafting Motion to Quash based on existing information; research on Rule 45 and [REDACTED]; review and analyze numerous financials from SCS, LPPM, Gold Crown, Ready Collect and Collect Max and work on [REDACTED] work on exhibit ID and elements to each.	8.30	275.00	2,282.50
09/25/2017 DP	Receipt and review of pleadings (Notice of Death of Norma J. Nix and Notice of Resignation of Personal Representative) which have now been filed with Charleston County Clerk of Court and provided by USPS; Update file accordingly. .	0.10	125.00	12.50
09/25/2017 DP	Receipt and review of Plaintiff's Memorandum Opposing Defendant Estate of Norma Nix's Motion for Summary Judgment which has now been filed with Charleston County Clerk of Court; Communicate with Attorney Musheff in regards to same and update file accordingly.	0.20	125.00	25.00
09/25/2017 DP	Receipt and review of Subpoenas issued to Joel Deason, Ryan McCabe, Stephanie Trotter and Anita Matthews to testify in Charleston County Master in Equity on September 26, 2017 at 10 a.m; Communicate with attorneys in regards to same; Update calendars and file accordingly.	0.30	125.00	37.50
09/25/2017 TM	Various communications with T. Allan regarding [REDACTED] various communications with J. Watson regarding [REDACTED] numerous communications with court, L. Dodds and parties concerning Nix actions and necessary responses; various communications with subpoena recipients from neighborhood, SCS, Gold Crown, legal community (including D. Brown, C. Sumner, S. Sumner, Z. Perry, L. DuBois, J. Watson, S. Cochran, Chuck Munn, R. Ricciboni, R. Stanley); complete Motion to Quash; communications with court on Motion to Quash; review and analyze information from A. Nix including witness list with 62 names and examples of subpoenas; travel to Court; review and analyze Motion to Disqualify as Counsel; participate in Court hearings on Motion to Quash, Motion to Disqualify and to join parties and to correct the record; return from Court; communications with Jerry Watson regarding [REDACTED]; chart elements to prove and points to make on direct and cross-examination; develop summary list of debt categories and computations; chart testimony; draft affidavit of attorney's fees; compile final exhibits and direct testimony outline; develop cross-examination outline for Nix; review covenants and legal research. .	11.70	275.00	3,217.50

09/26/2017 TM	Prepare for trial; prepare J. Watson [REDACTED]; participate in trial; return to office; follow-up discussions with Z. Perry concerning [REDACTED]; communication with board members concerning [REDACTED]; communications with J. Watson [REDACTED]; communications with Sally Newman concerning settlement and Nix issues.	13.00	275.00	3,575.00
09/27/2017 TM	Communications with former board member S. Sumner concerning [REDACTED]; communications with Tex Brown of Office of Disciplinary Counsel concerning Nix issues; memo to board concerning [REDACTED]; communications with Kelly Rainsford of SC Consumer Affairs regarding Nix subpoena; review trial notes and MSJ briefs and begin drafting proposed order for Judge Scarborough.	6.70	275.00	1,842.50
09/28/2017 TM	Voluminous communications with Board, Gold Crown and Ryan McCabe [REDACTED]; attention to draft order and packing up trial materials.	7.40	275.00	2,035.00
09/29/2017 TM	Ongoing communications with Z. Perry and Gold Crown concerning [REDACTED]	2.20	275.00	605.00
09/30/2017 TM	Communications with Z. Perry, board and Gold Crown [REDACTED]	0.30	275.00	82.50
10/01/2017 TM	Communications with D. Brown and Churchill Park Board concerning [REDACTED]; communications with A. Willis concerning [REDACTED]	0.80	275.00	220.00
10/02/2017 TM	Various communications with Gold Crown and board concerning [REDACTED]; attention to record from trial and proposed Order.	1.20	275.00	330.00
10/03/2017 TM	Various communications with Z. Perry and Gold Crown [REDACTED]; attention to proposed court opinion on Nix matters.	1.80	275.00	495.00
10/03/2017 VC	Review pleading, update pleadings index and file.	1.10	125.00	137.50
10/03/2017 VC	Review discovery, update discovery index and file.	0.30	125.00	37.50
10/04/2017 TM	Review and analyze Nix checks sent to MTB and provided by Haylen for response; drafting proposed order; prepare response to Alan Nix for return of checks with explanation and noting bad faith submittal; communications with J. McSweeney concerning status of representation, motion to be relieved as counsel and court instructions from the bench concerning same issues;	3.60	275.00	990.00
10/05/2017 TM	Communications with J. McSweeney concerning new case number and representation issues.	0.30	275.00	82.50
10/06/2017 TM	Communications with Court concerning Motion to Quash subpoenas.	0.20	275.00	55.00

10/09/2017 TM	Communications with Court concerning Motion to Quash; communications with J. McSweeney concerning formal withdrawal as counsel and review and analyze various documents transmitted to court concerning same; attention to draft opinion on nix litigation.	1.80	275.00	495.00
10/11/2017 TM	Letter to A. Nix regarding return of attempted bad faith payment checks; drafting proposed order for trial.	5.90	275.00	1,622.50
10/13/2017 DP	Receipt and review of Notice of Entry of Judgment/Order mailed to firm by Charleston County Clerk of Court advising Motion/Order had been filed and may be obtained online; Retrieve and review Certificate of Service as to Order Relieving Counsel, Form 4 Order Granting Motion to Quash, Motion to Disqualify Opposing Counsel w/ voluminous exhibits/attachments and provide same to attorney; Update file as needed.	0.60	125.00	75.00
10/13/2017 DP	Receipt and review of correspondence from Jaime Lee McSweeney to include but not limited to proposed Consent Order Relieving (McSweeney) as Counsel for Plaintiff with explanation thereto; Provide same to attorney and update file accordingly.	0.20	125.00	25.00
10/18/2017 TM	Review and analyze court order on J. McSweeney's withdrawal as counsel; attention to drafting court order.	2.20	275.00	605.00
10/19/2017 DP	Receipt and review of correspondence from Jaime Lee McSweeney to include Consent Order executed by Judge Scarborough; Communicate with responsible attorney in regards to same; Update file as needed.	0.20	125.00	25.00
10/27/2017 DP	Discuss matter with responsible attorney; Edit/revise Plaintiff Churchill Park's Memorandum Opposing Defendant Alan Nix's Motion for Reconsideration of September 29, 2017 Order; Draft/compose correspondence to Charleston County Clerk of Court with instructions for filing the same; Update file accordingly.	0.40	125.00	50.00
10/27/2017 DP	Communicate with client via email providing copy of correspondence to Court and Memo being filed.	0.10	125.00	12.50
10/30/2017 DP	Receipt and review of Defendant's Motion for Reconsideration and/or Clarification of Order dated September 29, 2017 which has now been filed with Charleston County Clerk of Court and provided to firm via USPS.	0.10	125.00	12.50
10/31/2017 DP	Receipt and review of mailing from Charleston County Clerk of Court to include filed Defendant's Motion for Reconsideration and/or Clarification of Order Dated September 29, 2017; Communicate with responsible attorney and update file as needed.	0.20	125.00	25.00
11/01/2017 VC	Review pleading, update pleadings index and file.	0.50	125.00	62.50
11/02/2017 TM	Communications with Court concerning motions and final Order; communications with Zane Perry concerning [REDACTED]; attention to final order draft.	2.60	275.00	715.00
11/03/2017 TM	Attention to final order for Court review.	2.80	275.00	770.00

11/06/2017 TM	Review trial notes, Motion for Summary Judgment and drafting detailed proposed trial order for court.	8.70	275.00	2,392.50
11/07/2017 DP	Review of correspondence from Charleston County Clerk of Court in regards to judgment entered on 10/31/17; Retrieve (from SC Courts) and review Master's Order Denying Defendant's Motion for Reconsideration; Communicate with responsible attorney in regards to same; Update file accordingly.	0.20	125.00	25.00
11/07/2017 DP	Receipt and review of Memorandum Opposing Defendant Alan Nix's Motion for Reconsideration of September 29, 2017 Order which has now been filed and returned by Charleston County Clerk of Court.	0.20	125.00	25.00
11/07/2017 TM	Communications with court; drafting proposed order for court.	4.40	275.00	1,210.00
11/08/2017 TM	Finalized proposed final order and follow up with court and counsel concerning same. Attention to preparing hard file for transmittal to Columbia office.	3.60	275.00	990.00
11/09/2017 TM	Numerous communications with A. Nix concerning Cedar Management letter referencing non-existent Churchill Park Homeowners Association, Inc 9 times; communications with Z. Perry concerning entity issues; communications with Beth McDowell concerning [REDACTED]; prepared [REDACTED] and follow up with Cedar Management concerning same. Communications with Capers Berr IV concerning a new Nix Subpoena. Communication with Andrew MacLester and Chris Houcke concerning Nix subpoena and prepare objectively for Woody Law Firm to same; follow up with Capers Barr re subpoenas; attempt to determine scope of Nix subpoena and actions.	6.40	275.00	1,760.00
11/10/2017 TM	Communication with C. Barr re subpoena; prepare Motion to Quash all subpoenas served by Nix post-trial; travel to courthouse and return; communication with A. Nix re Motion.	3.80	275.00	1,045.00
11/13/2017 TM	Travel to court to file Motion to Quash and return to office; communication with A. Nix concerning trial exhibits and proposed order on future case and review and analyze same; communication with A. Nix concerning assignment and Jerry Watson testimony; communication with court concerning final order.	4.90	275.00	1,347.50
11/15/2017 DP	Receipt and review of Alan Nix's trial exhibits (in excess of 35 exhibits) and ensure same are saved to file; Briefly discuss matter with responsible attorney.	0.40	125.00	50.00
11/15/2017 TM	Check with clerk of court docket re Final Order status and Motion to Quash post trial subpoena; communication with Board and Cedar Management concerning case status, final order and Motion to Quash; communication with Capers Barr IV re subpoenas; communication with Rick Ricinonni re subpoenas; research on appeals from Master in Equity.	3.20	275.00	880.00

11/16/2017 TM	Various communications with A. Nix and others re subpoena and orders and case status; communication with Rick Ricibonna re subpoenas; communications with court re Motion to Quash and Final Judgment; locate Final Order and review and analyze same; communications with Board concerning [REDACTED]; communication with firm re [REDACTED]; prepare letters S. Newman and A. Nix re settlement and formal written notice of order to issue [REDACTED].	5.70	275.00	1,567.50
11/17/2017 TM	Communications with J. Watson and J. Wierringa concerning; communication with court concerning motion for a directed verdict and review clerk of court records to locate same; letters to all counsel requesting copies of documents from subpoenas.	2.60	275.00	715.00
11/20/2017 TM	Begin review and analysis of Alan Nix 2,130 page Motion for a direct verdict; communication with Sally Newman re Ethan Nix motion filing, communication with court concerning Ethan Nix/Estate of Norma Nix filing; travel to post office for mailing.	3.70	275.00	1,017.50
11/21/2017 TM	Communications with court concerning motion hearing issues; review Clerk of Courts website for additional nix filings; begin review and analysis of Nix 120 page Motion for Reconsideration on various pretrial issues and for recusal of judge Scarborough.	2.70	275.00	742.50
11/22/2017 DP	Receipt and review of correspondence from Charleston County Clerk of Court advising Masters Final Order of Judgment has been filed and may be viewed on judicial index; Retrieve Masters Final Order of Judgment from SC Courts (online/judicial index), review the same and provide to responsible attorney; Update file as needed.	0.40	125.00	50.00
11/22/2017 DP	Retrieve (from SC Courts online/judicial index) and review Motion to Quash Post-Trial Subpoenas of Defendant Alan Nix; Update file to contain the same.	0.10	125.00	12.50
11/22/2017 DP	Retrieve (from SC Courts online/judicial index) Defendant's Motion for Reconsideration: Orders Dated September 29, 2017 and October 31, 2017 or in the alternative, Recusal and provide the same to responsible attorney; Update file as needed.	0.20	125.00	25.00
11/22/2017 DP	Receipt and review of lengthy correspondence from Nix to include request for "potential offer" as well as Motion for Directed Verdict; Provide aforementioned articles to responsible attorneys; Update file as needed.	0.40	125.00	50.00
11/22/2017 TM	Communications with D. Peele concerning Motion by Alan Nix to reconsider or for Recusal of judge Scarborough; follow up with D. Peele concerning court's final judgment; review and analyzed nix letter on settlement; Review and analyze Nix motion for directed verdict; review and analyze Rule 50 and rule 59.	3.20	275.00	880.00

11/27/2017 TM	Communications with J. Watson concerning [REDACTED], prepare draft objection to subpoena and follow up with J. Watson [REDACTED] same; communication with Ryan Oates concerning [REDACTED] [REDACTED] prepare draft objections for Chuck Munn/SCS and follow up with Chuck concerning [REDACTED]	1.80	275.00	495.00
11/28/2017 DP	Receipt and review of correspondence to Attorney Musheff from Defendant Nix in response to Musheff's letter of 11/16/17.	0.10	125.00	12.50
11/28/2017 TM	Review and analyze 3 100 plus page motions from Alan nix seeking to reverse the Court's favorable ruling on foreclosure action and prepare for motions hearing on multiple motions plus anticipation of additional antics from A. Nix including serving of additional subpoenas and follow-up on same; communication with Court concerning motion hearings.	6.30	275.00	1,732.50
11/29/2017 TM	Prepare for and participate in Motion Hearing on multiple Nix Motions and Plaintiff Motion to Quash post trial subpoena; return to office; phone discussion with former board president S. Sumner concerning [REDACTED].	5.70	275.00	1,567.50
11/30/2017 TM	Post hearing attention to file and documents for Columbia to file; prepare detailed memo to Zane Perry and Board concerning [REDACTED] [REDACTED] travel to post office and return after mailing Nix envelope; communication with Beth McDowell concerning [REDACTED]; Communication with D. Brown concerning [REDACTED]; communication with Glenda concerning [REDACTED].	4.10	275.00	1,127.50
12/01/2017 TM	Determine appropriate sale date for Nix property; review and analyze RMC records for mortgages on Nix property and review and analyze same; review and analyze master's preferred template for sale notice and develop sale notice to meet master's requirements with additional conditions needed for association lien foreclosure; review hearing notes on court's rulings on various motions and draft and finalize proposed orders for 4 post-trial motions ruled on at hearing; communications with A. Nix concerning subpoena and hearing issues and issues with proposed order language and complaints about final order scope; communications with Nix and Court and Sally Newman concerning court actions and orders; communications with January O'Neale concerning sale notice issues and process for Charleston County and time frame for notice and timing of sale given appeal period and follow-up on same; Review Judge Scarborough's sale procedures instructions and memo and templates for prep sheets and other court documents; communications with Marti Dennis concerning proposed Order and sale issues and instructions.	4.20	275.00	1,155.00

12/04/2017 DP	Briefly discuss matter with responsible attorney; Review file and update same to include attorneys notes as to each of four (then pending) motions.	0.20	125.00	25.00
12/04/2017 TM	Communications with A. Nix concerning subpoena quash order and his responsibilities to notify recipients and follow-up on identifying exactly who the recipients of the subpoenas were; communications with A. Nix, Judge Scarborough, Clerk of Courts concerning 40(j), 2104 and 2017 case numbers and court and Clerk of Court processes; communications with SCT concerning [REDACTED]	1.60	275.00	440.00
12/05/2017 TM	Research and drafting of Memorandum opposing defendant Alan Nix's Motion for Judicial Recusal to refute numerous examples cited by Mr. Nix as alleged bias; review and analyze Court ruling on various pending motions; communications with A. Nix and S. Newman concerning court order and follow-up required from Nix on quashed subpoenas.	7.30	275.00	2,007.50
12/06/2017 DP	Receipt and review of parcel provided by Nix to include Defendant's Motion to Alter or Amend the Order Dated November 9, 2017 or in the alternative, New Trial Demanded; Briefly discuss matter with responsible attorney & update file as needed.	0.20	125.00	25.00
12/06/2017 DP	Receipt and review of parcel served by Nix to include Defendant's Motion to Restore Case due to Dismissed in Error which has been filed in the Charleston County Clerk of Court's Office on 11/28/17; Briefly discuss matter with responsible attorney and update file as needed.	0.20	125.00	25.00
12/06/2017 TM	Research on issues of mootness and justiciability of recusal motion and continuing draft and finalization of Memorandum opposing Nix Motion for Judicial Recusal; compile filing for Court and service upon parties and travel to and return from post office; communications with D. Peele concerning Nix Motion for Judicial Recusal; communications with D. Peele concerning Nix Motion to Restore Case to due Dismissal in Error; communications with Robert Duncan concerning Nix claim of two separate lawsuits;	7.60	275.00	2,090.00
12/07/2017 JD	Received Motion from defendant and responsive email from Clerk of Court.	0.10	175.00	17.50
12/07/2017 TM	Communications with D. Peele concerning Nix Motion to Restore Case Due to Dismissal in Error Review and analyze Nix Motion to Restore Case due to Dismissal in Error; communications with Dave Brown concerning [REDACTED], Court ruling on various motions and impact of same and appeal time frame and logistics; communications with A. Nix and S. Newman concerning court order and follow-up required from Nix on quashed subpoenas.	3.20	275.00	880.00

12/08/2017	TM	Communications with A. Nix, Court and Clerk of Courts concerning 40j issues and processes, case dismissal and multiple case numbers and fee-for-referral; draft memorandum opposing Nix Motion to restore case dismissed in error and finalize same; prepare package for filing of Memorandum and transmittal documents for Clerk of Courts.	7.10	275.00	1,952.50
12/12/2017	DP	Receipt and review of Plaintiff's Memorandum Opposing Defendant Alan Nix's Motion for Judicial Recusal which has now been filed in and returned by Charleston County Clerk of Court; Update file as needed.	0.10	125.00	12.50
12/12/2017	TM	Communications with A. Nix and Court and Clerk of Courts concerning case number, 40(j) and referral to Master in Equity issues and follow-up on same.	0.60	275.00	165.00
12/13/2017	TM	Various communications with Alan Nix, Court and Clerk of Courts concerning 40(j); Follow-up with Hayley concerning case issues and status.	0.50	275.00	137.50
12/14/2017	DP	Receipt and review of Plaintiff Churchill Park's Memorandum Opposing Defendant Alan Nix's Motion to Restore Case Claimed to be Dismissed In Error which has now been filed in and returned to our office by Charleston County Clerk of Court via USPS (on 12/14/17); Update file as needed.	0.10	125.00	12.50
12/14/2017	TM	Communication with Court concerning memorandum opposing Nix's attempt to get duplicate case number restored as a new case and follow-up on same; discussion with S. Sumner concerning [REDACTED] and follow-up on same; discussion with A. Nix.	1.80	275.00	495.00
01/02/2018	JD	Email exchange with Todd M. re [REDACTED].	0.10	175.00	17.50
01/13/2018	DP	Receipt and review of correspondence from Churchill Park HOA to Jaime McSweeney in regards to this matter; Update file as needed.	0.10	125.00	12.50
01/13/2018	DP	Review of file materials to include but not limited to research performed by and notes of Attorney Musheff; Update file as needed.	0.80	125.00	100.00
01/26/2018	DP	Receipt and review of correspondence from Alan Nix dated 1/23/18 and briefly discuss same with responsible attorney(s).	0.10	125.00	12.50
01/29/2018	ST	Draft Letter to Judge Scarborough re sale date.	0.20	275.00	55.00
03/02/2018	DAH	Prepare Motion to Sell Property.	1.30	275.00	357.50
03/02/2018	DP	Briefly discuss matter with responsible attorney(s) and begin drafting/preparation of Motion (for sale); Update file accordingly.	0.20	125.00	25.00
03/02/2018	ST	Draft Motion for Sale of Property.	0.20	275.00	55.00
03/26/2018	DP	Receipt and review of correspondence from Nix; Update file as needed.	0.10	125.00	12.50
04/17/2018	DP	Receipt and review of correspondence from Alan Nix requesting a full account listing as to Churchill/Park West Master Association; Update file as needed.	0.10	125.00	12.50

05/18/2018	ST	Receipt and Review of Correspondence from Alan Nix re: Todd Musheff.	0.20	275.00	55.00
05/22/2018	AM2	Drafted Memorandum in opposition of Rule 59+60 Motions.	4.00	125.00	500.00
05/29/2018	ST	Draft Memorandum in Support of Plaintiff's Motion to Schedule Sale.	1.40	275.00	385.00
05/29/2018	ST	Revise and finalize draft Memorandum in Opposition to Defendant's Motions.	0.90	275.00	247.50
05/29/2018	ST	Receipt and review of Copy of Letter to Elaine Bozman From Nix.	0.10	275.00	27.50
05/30/2018	ST	Travel to and from Charleston County to attend and participate in hearing on various motions by Defendant and Plaintiff's Motion to Schedule Sale.	5.60	275.00	1,540.00
06/01/2018	ST	Draft Order Granting Plaintiff's Motion to Schedule Sale; transmit same to Court via email.	0.60	275.00	165.00
06/04/2018	ST	Email Chain with Alan Nix re: Mr. Nix's attempt to serve MTB with pleadings by leaving them under Charleston door.	0.50	275.00	137.50
06/16/2018	ST	Receipt and review of email from Alan Nix forwarding email from Stephen Sumner and requesting information about "unexplained occurrences" at his home and investigators.	0.20	275.00	55.00
06/18/2018	ST	Email to Nix regarding his attempted resignation from the Association; Receipt and review of Nix's lengthy response.	0.20	275.00	55.00
06/19/2018	DP	Review of file and update Pleadings Index as needed.	0.10	125.00	12.50
06/26/2018	ST	Receipt and review of 4 separate emails from Nix related to his attempted resignation; responded to Nix via email twice.	0.40	275.00	110.00
07/07/2018	ST	Receipt and review of Letter from Nix re: invalid notice of lien (5/22/18).	0.10	275.00	27.50
07/09/2018	ST	Receipt and review of Motion and Order Form and Defendant's Motion For Relief from Order Dated June 1, 2018.	0.30	275.00	82.50
07/27/2018	ST	Receipt and review of email chain from Alan Nix and Todd Musheff regarding Ex. 11 and the identity of the handwriting located on the same.	0.30	275.00	82.50
07/27/2018	ST	Receipt and review of email chain between Alan Nix and Cedar Management regarding 2018 Invoice and Payment Receipt.	0.30	275.00	82.50
08/24/2018	ST	Review of Defendant's Motion; review of relevant transcripts from prior hearings; development of argument outline for hearing scheduled for 8/27/18.	1.60	275.00	440.00
08/24/2018	ST	Receipt and review of emails from Alan Nix to Ryan McCabe regarding several checks Mr. Nix mailed to MTB. Researched file and located where Todd Musheff previously returned these checks to Mr. Nix. Mailed the checks back to Mr. Nix with copy of Mr. Musheff's letter of explanation.	0.50	275.00	137.50
08/25/2018	ST	Emails with client regarding Alan Nix's allegations regarding insufficiency of advertising; email copy of ad to client to confirm sale is still on.	0.20	275.00	55.00

08/26/2018	ST	Receipt and review of email from Alan Nix to Ryan Oates regarding Todd Musheff's emails after Mr. Musheff's departure from MTB.	0.20	275.00	55.00
08/27/2018	ST	Travel to and from Charleston County to attend and participate in hearing on Defendant's Motion to Clarify and Relief from Order dated 6/1/18.	4.50	275.00	1,237.50
08/27/2018	ST	Receipt and review of Incoming Correspondence: Nix's Complaint to ODC re: Mikell Scarborough.	0.10	275.00	27.50
08/28/2018	ST	Receipt and review of email from Alan Nix requesting changes to sale advertisement and filing of the affidavit of publication.	0.10	275.00	27.50
08/28/2018	ST	Receipt and review of email chain from Mr. Nix to Todd Musheff requesting information related to Judge Scarborough's reduction in attorney's fees between date of trial and final order.	0.10	275.00	27.50
08/28/2018	ST	Receipt and review of Form 4 Order from 8/27/18 Hearing.	0.10	275.00	27.50
08/28/2018	ST	Receipt and review of Motions to Record Proceeding, Motions to Restore Case Motions, Motion to Clarify and Reconsider; Motion to Change Hearing Date; Motion to Correction Previous Caption.	0.40	275.00	110.00
08/29/2018	ST	Receipt and review of email from Alan Nix regarding; timeline to file certification of advertisement, Email also requested information on the checks previously returned to Mr. Nix and the attorney's fees incurred in this matter.	0.30	275.00	82.50
08/31/2018	ST	Receipt and review of Defendant's Motion to Stay Sale filed August 31, 2018.	0.30	275.00	82.50
09/01/2018	ST	Research regarding S.C. Code 18-9-130 v. 18-9-170; research regarding requirement of affidavit of publication; preparation of argument outline for hearing scheduled on 9/4/18 and supporting case citations.	1.20	275.00	330.00
09/04/2018	ST	Travel to and from Charleston County to attend Defendant's Motion to Stay Sale.	5.00	275.00	1,375.00
09/14/2018	AG	Performed legal research on gatekeeper orders and drafted motion for gatekeeper order.	2.00	175.00	350.00
09/26/2018	DP	Review of documents filed herein; Update Pleadings Index as needed.	0.10	125.00	12.50
10/31/2018	DP	Review of numerous pleadings filed with the Court; Update file and Pleadings Index as needed.	0.40	125.00	50.00
11/09/2018	AG	Receipt and review of Defendant's Emergency Motion for Injunction.	0.40	175.00	70.00
11/21/2018	ST	Receipt and review of Defendants 60(b) Motion for Order Filed 11/9/17.	0.30	275.00	82.50
12/26/2018	ST	Receipt and review of Nix's Motion to Compel Plaintiff's Compliance with SC Code 18-9-130(2).	0.20	275.00	55.00
03/12/2019	ST	Receipt and review of Correspondence from Nix to client re: Property Taxes and requesting bond be released pending appeal.	0.20	275.00	55.00

04/10/2019 DP	Edit/revise Pleadings Index to reflect Defendants' Motion to Restore Case to General Docket recently filed with Charleston County Clerk of Court (Common Pleas); Update file as needed.	0.10	125.00	12.50
04/11/2019 ST	Receipt and review of correspondence from nix re: filing claims with estate on behalf of Churchill Park.	0.10	275.00	27.50
06/28/2019 ST	Email to client regarding [REDACTED]	0.10	275.00	27.50
01/27/2020 ST	Review of Order Denying Cert; review of statute regarding bond; review of SCACR regarding award of costs on appeal; email to client regarding [REDACTED]	0.50	275.00	137.50
Sub-total Fees:			<u> </u>	<u> </u>
				\$82,312.50

Please remit payment in the amount listed above. The Total Now Due reflects the balance due after any available payments have been applied. Such payments include any cost retainer you've paid, any payments made by the property owner, and payments you've previously submitted. If you have any questions please contact Glenda Murphy at glenda.murphy@mccabetrotter.com or 803-724-5000. Thank you!

We now accept credit cards! Please call Glenda Murphy at 803-724-5012 to make payment via credit card.

PO Box 212069
Columbia, SC 29221



McCABE TROTTER & BEVERLY, P.C.
COMMUNITY ASSOCIATION AND CONSTRUCTION LAW

Invoice as of 4/15/2020
Invoice no 87041

Churchill Park
Steven Grimes
Cedar Management Group
PO Box 26844
Charlotte, NC 28221

017990.00025: Nix, Alan G. & Norma J - 1401 Densmore Circle - Post Appeal

Professional Fees		Hours	Rate	Amount
02/18/2020	ST Prepare Motion for Supplemental Hearing; E-File motion with court; prepare COS to Pro Se Defendant; mail motion to Pro Se Defendant; e-file COS with court.	0.60	275.00	165.00
02/18/2020	ST Begin preparing affidavit of additional attorney's fees.	0.50	275.00	137.50
02/19/2020	ST Review CCR regarding attorney's fee provision.	0.30	275.00	82.50
02/19/2020	ST Research regarding recovery of attorney's fees post-appeal; review trial transcript to determine [REDACTED]	0.50	275.00	137.50
02/19/2020	ST Continue drafting affidavit of attorney's fees and costs.	1.20	275.00	330.00
02/28/2020	ST Receipt and review of letter from Alan Nix regarding Motion to Schedule Hearing; confirm notice of motion was served on counsel for Estate of Norma Nix via Courtesy NEF.	0.30	275.00	82.50
02/28/2020	ST Email with client regarding [REDACTED]	0.10	275.00	27.50
02/28/2020	ST Email to client regarding [REDACTED]	0.20	275.00	55.00
02/28/2020	ST Conference with DP regarding [REDACTED]	0.10	275.00	27.50
03/02/2020	EG Review and analyze requirements of governing documents relative to Association's budget.	0.30	275.00	82.50
03/02/2020	ST Receipt and review of email from client regarding [REDACTED]; email to EG and VG requesting opinion on same.	0.20	275.00	55.00
03/02/2020	ST Email to client regarding [REDACTED]	0.10	275.00	27.50
03/12/2020	DP Follow-up communication with J. O'Neale with Charleston County in regard [REDACTED]; Notate file.	0.60	125.00	75.00
03/13/2020	MB Phone call with Thornton regarding [REDACTED]	0.20	175.00	35.00
Sub-total Fees:				\$1,320.00

PO Box 212069
Columbia, SC 29221

ELECTRONICALLY FILED - 2020 Aug 20 7:01 AM - CHARLESTON - COMMON PLEAS - CASE#2017CP1004031

Rate Summary

Morgan Bryant	0.20 hours at \$175.00/hr	35.00
Ely Grote	0.30 hours at \$275.00/hr	82.50
Deanne Peele	0.60 hours at \$125.00/hr	75.00
Stephanie Trotter	4.10 hours at \$275.00/hr	1,127.50
Total hours:	5.20	

Total Current Billing:	\$1,320.00
Previous Balance Due:	\$0.00
Total Payments:	\$0.00
Total Now Due:	\$1,320.00

Please remit payment in the amount listed above. The Total Now Due reflects the balance due after any available payments have been applied. Such payments include any cost retainer you've paid, any payments made by the property owner, and payments you've previously submitted. If you have any questions please contact Glenda Murphy at glenda.murphy@mccabetrotter.com or 803-724-5000. Thank you!

We now accept credit cards! Please call Glenda Murphy at 803-724-5012 to make payment via credit card.

PO Box 212069
Columbia, SC 29221



MCCABE, TROTTER & BEVERLY, P.C.
COMMUNITY ASSOCIATION AND CONSTRUCTION LAW

Invoice as of 8/19/2020
Invoice no 90347

Churchill Park
Steven Grimes
Cedar Management Group
PO Box 26844
Charlotte, NC 28221

017990.00025: Nix, Alan G. & Norma J - 1401 Densmore Circle - Post Appeal

Professional Fees		Hours	Rate	Amount
03/05/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
03/08/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
03/13/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
03/13/2020	SK Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
03/13/2020	SK Receipt and review of 3rd email from Alan Nix.	0.10	275.00	27.50
03/18/2020	SK Receipt and review of email from Alan Nix; review of Motion to Court of Appeals filed by Mr. Nix.	0.20	275.00	55.00
04/02/2020	SK Receipt and review of letter from Alan Nix.	0.10	275.00	27.50
04/26/2020	ST Receipt and review of email from Alan Nix.	0.10	275.00	27.50
04/27/2020	ST Receipt and review of letter from Alan Nix regarding incorporation of various entities.	0.10	275.00	27.50
04/27/2020	ST Email to BOD regarding status of requested conference call and strategy moving forward.	0.10	275.00	27.50
05/07/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/08/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/10/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/13/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/14/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/14/2020	SK Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
05/14/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/14/2020	SK Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
05/15/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/15/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/16/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/17/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/18/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/19/2020	SK Receipt and review of email from Alan Nix.	0.10	275.00	27.50

PO Box 212069
Columbia, SC 29221

05/21/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/26/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/29/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/30/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
05/30/2020 SK	Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
06/01/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/04/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/05/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/05/2020 SK	Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
06/10/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/11/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/11/2020 SK	Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
06/11/2020 SK	Receipt and review of 3rd email from Alan Nix.	0.10	275.00	27.50
06/13/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/18/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/18/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/18/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/18/2020 SK	Receipt and review of email from Brian Boger in response to Alan Nix.	0.10	275.00	27.50
06/23/2020 SK	Receipt and review of motion roster notice; consultation with paralegal regarding same and need to notify court that matter is appropriately scheduled with Master in Equity and not circuit court.	0.10	275.00	27.50
06/23/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/24/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
06/24/2020 SK	Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
07/02/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/02/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/06/2020 SK	Review and receipt of Court of Appeals Order approving costs; update file to note the same.	0.20	275.00	55.00
07/13/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/15/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/17/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/18/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/18/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/21/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/21/2020 SK	Receipt and review of 2nd email from Alan Nix.	0.10	275.00	27.50
07/23/2020 SK	Receipt and review of email from Alan Nix.	0.10	275.00	27.50
07/24/2020 SK	Receipt and review of correspondence from client forwarding correspondence from Alan Nix.	0.10	275.00	27.50

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07/24/2020	SK	Receipt and review of correspondence (2nd set) from client forwarding correspondence from Alan Nix.	0.10	275.00	27.50
07/31/2020	SK	Consult with paralegal regarding scheduling of Supplemental Damages Hearing; review and revise Notice of Hearing; approve final approved Notice of Hearing.	0.10	275.00	27.50
07/31/2020	SK	Prepare lengthy email to client regarding upcoming hearing and case strategy.	0.50	275.00	137.50
08/11/2020	SK	Receipt and review of email from Steven Grimes regarding upcoming testimony; respond to same with list of items needed for hearing preparation.	0.10	275.00	27.50
08/11/2020	SK	Email to Allen Thornton regarding options and strategy for moving case forward in light of upcoming supplemental hearing.	0.30	275.00	82.50
08/12/2020	SK	Email to client regarding [REDACTED]; email to client regarding new RTSC process in Charleston County and impact on case.	0.20	275.00	55.00
08/12/2020	SK	Review statements from client in preparation for upcoming damages hearing; research invoices paid to MTB and refunds issued for overpayment; email to client with additional information needed.	0.50	275.00	137.50
08/12/2020	SK	Work on information related to affidavit of costs to separate out items already awarded by trial court and court of appeals.	0.30	275.00	82.50
08/12/2020	SK	Receipt and review of email from client [REDACTED].	0.10	275.00	27.50
08/13/2020	SK	Receipt and review of letter from Alan Nix wherein he acknowledges receipt of the Notice of Hearing for 8/20/20 but states he will not be attending.	0.20	275.00	55.00
08/14/2020	SK	Continue working on affidavit of attorney's fees to separate out entries already awarded or disallowed at original hearing and at appellate level.	0.50	275.00	137.50
08/14/2020	SK	Begin drafting affidavit of costs to separate out new costs from those already awarded or disallowed at original trial and appellate level.	0.40	275.00	110.00
08/14/2020	SK	Continue drafting demonstrative exhibit showing new charges sought; email to client with question regarding [REDACTED].	0.30	275.00	82.50
08/14/2020	SK	Continue drafting demonstrative showing charges sought supplementary to original trial order; [REDACTED].	0.30	275.00	82.50
08/14/2020	SK	Begin redacting fee invoices for privileged information and information protected from disclosure by work product doctrine.	0.50	275.00	137.50
08/17/2020	SK	Email to client regarding [REDACTED].	0.10	275.00	27.50

08/18/2020 SK	Emails with Steve Grimes regarding corporate records; telephone call with Allen Thornton regarding strategy for upcoming hearing.	0.30	275.00	82.50
08/18/2020 SK	Begin drafting affidavit of attorney's fees to include details regarding Alan Nix's actions that have increased attorney's fees in this matter.	0.40	275.00	110.00
08/18/2020 SK	Begin assembling final exhibits for supplemental hearing.	0.10	275.00	27.50
08/19/2020 SK	Finalize Affidavit of Attorney's Fees and Costs.	0.20	275.00	55.00
			Sub-total Fees:	\$3,162.50

Rate Summary

Stephanie Kellahan	11.20 hours at \$275.00/hr	3,080.00
Stephanie Trotter	0.30 hours at \$275.00/hr	82.50
Total hours:	11.50	

Total Current Billing:	\$3,162.50
Previous Balance Due:	\$1,320.00
Total Payments:	\$1,320.00
Total Now Due:	\$3,162.50

Please remit payment in the amount listed above. The Total Now Due reflects the balance due after any available payments have been applied. Such payments include any cost retainer you've paid, any payments made by the property owner, and payments you've previously submitted. If you have any questions please contact Glenda Murphy at glenda.murphy@mccabetrotter.com or 803-724-5000. Thank you!

We now accept credit cards! Please call Glenda Murphy at 803-724-5012 to make payment via credit card.

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF CHARLESTON

Churchill Park,

Case No.: 2017-CP-10-04031

Plaintiff,

AFFIDAVIT OF ADDITIONAL COSTS

v.

Alan Nix and the Estate of Norma Nix,

Defendants

017990.00025

PERSONALLY appeared before me, the undersigned, who being duly sworn, deposes and states that she is an attorney of the law firm, McCabe, Trotter & Beverly, P.C., which represents the Plaintiff in the foreclosure herein and states that since the Judgment was entered on November 9, 2017, pursuant to information from the Plaintiff, Plaintiff has incurred expenses as follows:

- a. Postage \$2.80
- b. Filing Fee - Motion to Schedule Sale \$25.00
- c. Advertisement of Notice of Sale \$810.84
- d. Copying Costs \$45.00
- e. Bid Fee \$45.00
- f. Filing Fee - Motion for Pre-Filing Injunction \$25.00
- g. Filing Fee - Motion for Supplemental Hearing \$25.00

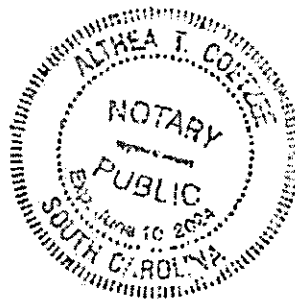
TOTAL COSTS OF COLLECTION TO DATE \$978.64

Stephanie Kellahan

Stephanie Trotter Kellahan
McCabe, Trotter & Beverly, PC
P.O. Box 212069
Columbia, South Carolina 29221
Phone: (803) 724-5000
Fax: (803) 724-5001
Email: stephanie.kellahan@mccabetrotter.com
Attorney for Plaintiff

Sworn to before me this 19
day of August, 2020

[Signature]
Notary Public for South Carolina
My Commission Expires: 02/10/2024



STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

CHURCHILL PARK,

Plaintiff,

v.

ALAN G. NIX AND ESTATE OF NORMA
J. NIX

Defendant(s).

IN THE COURT OF COMMON PLEAS

C/A No.: 2017-CP-10-04031


CERTIFICATE OF MAILING

17990.00010

I, Althea T. Coetzee, an employee of the law offices of McCabe, Trotter & Beverly, P.C., attorneys for Plaintiff, do hereby certify that I have mailed a copy of the filed Affidavit of Attorney's Fees and Affidavit of Additional Costs, a copy of which has been e-filed in connection with the above-referenced case, by mailing a copy of the same by United States mail, postage prepaid, to each of the addressees listed below and in separate envelopes, at each of their respective addresses listed, this 13 day of October, 2020.

Alan G. Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

Ethan Nix
Personal Representative for Estate of Norma Nix
211 Posey Hill Road
Liberty, SC 29657



Althea T. Coetzee

Columbia, South Carolina

Exhibit

2



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

October 06, 2020

Alan G. Nix
1401 Densmore Circle
Mount Pleasant SC 29466

Re: Alan Nix v. Churchill Park
Appellate Case No. 2020-001304

Dear Mr. Nix:

Upon reviewing your notice of appeal, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your appeal will be dismissed:

- The appeal of the September 27, 2019 order in case number 2018-CP-10-03315 is not timely served. Accordingly, this appeal will proceed without consideration of this order.

Very truly yours,


CLERK

cc: Todd M. Musheff, Esquire
Stephanie Trotter Kellahan, Esquire

Exhibit

3

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)
))
CHURCHILL PARK,)
))
Plaintiff,)
))
vs.)
))
ALAN G NIX , NORMA J NIX and the)
ESTATE OF NORMA J NIX,)
))
Defendants.)
))
))
))

IN THE COURT OF COMMON PLEAS
THE NINTH JUDICIAL CIRCUIT

CASE NUMBER: 2017-CP-10-04031
And?
2014-CP-10-05407?

CERTIFICATE OF SERVICE
(Amended)

The undersigned hereby certifies that on the 22nd day of October 2020, a copy of the motion for emergency injunction, add indispensable parties, etc. in these case(s) was served upon all parties and/or their respective counsel of record via USPS and/or hand delivery and/or email as follows:

McCabe and Trotter
4500 Fort Jackson Blvd.
Columbia, SC 29209
(hand delivery)

Todd Musheff and Law
1121 Park West Blvd., Ste. 148 B
eg., PakMail
Mount Pleasant, SC 29466

SC Court of Appeals
1220 Senate St.
Columbia, SC 29201
(hand delivery)

Sarah Schreiber, Esq.
Charleston Legal Access
3775 Spruill Ave., Ste. B
North Charleston, SC 29405

First Federal Savings & Loan Association
of Charleston dba CenterState Bank, N.A.
c/o Nicole Comer
700 Gervais St.
Columbia, SC 29202
(hand delivery)

State Street Holdings, LLC
c/o MP Morris Law Firm
3600 Forest Drive, Ste. 201
Columbia, SC 29204
(hand delivery)

CenterState Bank, N.A.
Office of General Counsel
1951 8th Street NW
Winter Haven, FL 33881

Peter McCoy
U.S. Attorney, South Carolina
1441 Main St., Ste. 500
Columbia, SC 29201
(hand delivery)

Churchill Park Homeowners' Association, Inc.
c/o Cedar Management Group
c/o Regus
1320 Main St., Ste. 300
Columbia, SC 29201
(hand delivery)

Park West Master Association, Inc.
c/o Richard Sweyer
7301 Rivers Ave., Ste. 245
North Charleston, SC 29406

SC Department of Revenue
Director Hartley Powell
300 A Outlet Point Blvd.
Columbia, SC 29210
(hand delivery)

Judge Jennifer McCoy
100 Broad St., Ste. 348
Charleston, SC 29401

Patrick Sumerell
c/o Forest Acres Well Care
5101 Forest Drive, Ste. A
Columbia, SC 29206

By:



Alan G Nix
1401 Densmore Circle
Mount Pleasant, SC 29466
(843) 991-4170

Exhibit

4

COURT OF COMMON PLEAS
AND GENERAL SESSIONS
100 BROAD STREET, SUITE 106
CHARLESTON, S.C. 29401-2258
(843) 958-5000
(843) 958-5020 FAX
clerkofcourt.charlestoncounty.org



FAMILY COURT OF THE
NINTH JUDICIAL CIRCUIT
CHARLESTON COUNTY
100 BROAD STREET, SUITE 143
CHARLESTON, S.C. 29401-2265
(843) 958-4400
(843) 958-4434 FAX
clerkofcourt.charlestoncounty.org

JULIE J. ARMSTRONG
CLERK OF COURT
CHARLESTON COUNTY

The enclosed document is being returned for the following reason(s);

- The document is not signed / notarized.
- The filing fee is insufficient. The correct amount is: _____
- The check or money order must be made payable to the Clerk of Court.
- This document is a copy. We must have an original.
- This is not a Charleston County case.
- The case has been transferred/remanded to: _____
- Inmate litigation must comply with S.C. Code of Laws, Title 24, Chapter 27.
- The document is refused for filing pursuant to S.C. Code of Laws §30-9-30(B)(1).
- Name of submitting party: _____
- There is not a case listed in our system that matches this caption.
- Information may be obtained from our web-site at <http://clerkofcourt.charlestoncounty.org/>
- The required **new case** coversheet is not included. (SCCA234)
- The required **motion/order** coversheet is not included. (SCCA/233)
- The required **order (Form 4)** coversheet is not included. (SCRCP Form 4C)
- Effective October 21, 2019 Charleston County began accepting electronic filings from all South Carolina licensed attorneys. Please re-submit your filing electronically.

Other: all documents in this case must be filed by an attorney per order of the court

Staff initials BJ

Date 10/29/20

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

NOV 02 2020

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity

Case No. 2014-CP-10-05407
2017-CP-10-04031

Appellate Case No. 2020-001304

Alan G. Nix, Norma J. Nix and the Estate of Norma J. Nix, Appellants,

v.

Churchill Park, Respondent

PROOF OF SERVICE

The undersigned certifies that a copy of the Appellants' Second Motion for Emergency Stay of Sale has been served upon the individuals listed below by mailing, hand delivering and/or emailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown, this 2nd day of November 2020 to:

Plaintiff Attorneys:
McCabe & Trotter
McCabe, Trotter & Beverly, P.C.
4500 Fort Jackson Blvd.
Columbia, SC 29209

Todd M. Musheff, Esq.
Law Offices of Todd M. Musheff
1121 Park West Blvd., Ste. B 148.
Mount Pleasant, SC 29466

(email and hand delivery)

(email and hand delivery)

Churchill Park Homeowners' Association, Inc.
c/o Cedar Management Group
c/o Regus
1320 Main St. Ste. 300
Columbia, SC 29201
(hand delivery)

Tonya Kohn
Court Administration
1220 Senate St.
Columbia, SC 29201
(email and hand delivery)

Sarah Schreiber
Charleston Legal Access
3775 Spruill Ave., Ste. B
North Charleston, SC 29405
(hand delivery and email)

Alan Wilson
SC Attorney General
1000 Assembly St.
Columbia, SC 29201
(email and hand delivery)

Nicole Comer
First Federal Savings & Loan Association
Association of Charleston dba Center State Bank
700 Gervais St.
Columbia, SC 29201
(email and hand delivery)

State Street Holdings, LLC
c/o MP Morris Law Firm
3600 Forest Drive
Columbia, SC 29204

Troy Thames
Wilson, Jones, Carter and Baxley
421 Wando Park Blvd.
Mt. Pleasant, SC 29464
(email and hand delivery)

Kevin Mims
Luzuriaga Mims
50 Immigration St.
Charleston, SC 29403
(email and hand delivery)


Peter McCoy
U.S. Attorney, SC
1441 Main St., Ste. 500
Columbia, SC 29201
(hand delivery)

Patrick Sumerell
State Street Holdings, LLC
c/o Forest Acres Well Care
5101 Forest Drive, Ste. A
Columbia, SC 29206
(hand delivery)

(signature next page)

Dated: November 1, 2020

Respectfully submitted,

By:  _____

Alan G. Nix
1401 Densmore Circle
Mount Pleasant, SC 29466
(843) 991.4170

RECEIVED

NOV 02 2020

SC Court of Appeals

Court of Appeals