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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

Appellate Case No. 2020-001225
Case No. 2020-CP-4601045

RECEIVED
NOV 24 2020
SC Court of Appeals

Timothy J. Saj,

Appellant,

v.

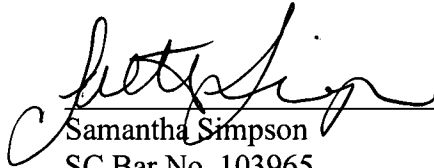
Haven at Regent Park,

Respondent,

RESPONDENT'S MOTION TO DISMISS

Now comes the Respondent, Haven at Regent Park (hereinafter "Haven at Regent Park"), by and through its counsel, Samantha Simpson of Brownlee Whitlow & Praet, PLLC, and respectfully requests this Honorable Court to dismiss Appellant's Appeal filed September 3, 2020. In support of its motion, Haven at Regent Park has included a Memo in Support of Respondent's Motion to Dismiss.

Respectfully submitted this 23rd day of November, 2020.

A handwritten signature in black ink, appearing to read 'S. Simpson', written over a horizontal line.

Samantha Simpson
SC Bar No. 103965
Brownlee Whitlow & Praet, PLLC
1850 E 3rd Street
Suite 350
Charlotte, North Carolina 28204
Telephone & E-Fax (704) 594-5558
Email: ssimpson@bwpf-law.com
Attorneys for Respondent

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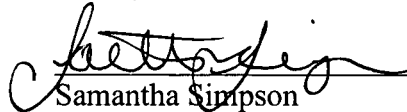
Respondent,

PROOF OF SERVICE

I certify that I have served **Respondent's Motion to Dismiss** by depositing a copy of it in the United States Mail, postage prepaid and via certified mail, on **November 23, 2020**, addressed to the following parties:

Timothy J. Saj
3108 Cool Bridge Circle
#103
Fort Mill, South Carolina 29715

Respectfully submitted this 23rd day of November, 2020.



Samantha Simpson
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1850 E 3rd Street, Suite 350
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Samantha Simpson
Direct Phone: (704) 594-5558
Email: ssimpson@bwpf-law.com
Licensed in NC and SC

November 23, 2020

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

VIA FEDERAL EXPRESS

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SC Court of Appeals

Re: Timothy J. Saj v. Haven at Regent Park
Appellate Case No. 2020-001225

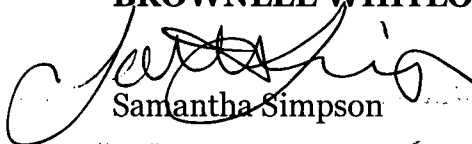
Dear Ms. Kitchings,

Enclosed, please find one original and six copies of Respondent's Motion to Dismiss and Memo in Support of Respondent's Motion to Dismiss and accompanying exhibits in the above-referenced matter. Please also find enclosed the filing fee in the amount of \$50.00.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

BROWNLEE WHITLOW & PRAET, PLLC


Samantha Simpson

SS/

Enclosures as stated above

CC: Timothy J. Saj - letter only (via First Class Mail and Certified Mail)

ORIGIN ID: QWGA (704) 548-7657
BROWNLEE WHITLOW & PRAET, PLLC

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SUITE 350
CHARLOTTE, NC 28204
UNITED STATES US

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TO **JENNY ABBOTT KITCHINGS**
SC COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

(803) 734-1890

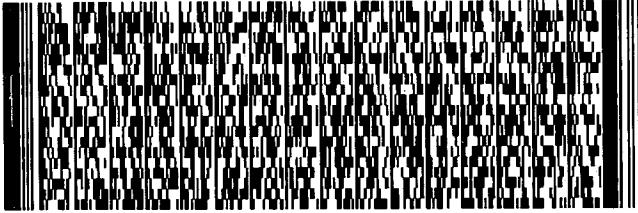
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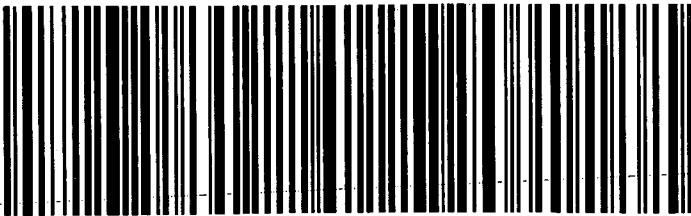
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