

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 Saj,

Appellant,

v.

Haven at Regent Park,

Respondent.

MEMO IN SUPPORT OF RESPONDENT'S MOTION TO DISMISS

Respondent, The Haven at Regent Park Apartment Holdings, LLC d/b/a The Haven at Regent Park (hereinafter "Respondent"), by and through its counsel, Samantha Simpson, in support of its motion to dismiss appeal would show unto this Honorable Court:

1. Respondent is the Landlord/Owner of that certain residential real property located at 3108 Cool Bridge Circ., Apt. 103, Fort Mill, South Carolina 29715 (hereinafter "Premises").
2. Appellant (hereinafter "Lessee") entered into an Apartment Lease Contract with Respondent for the rental of the Premises with a monthly rental amount of \$1,570.00 per month, due on or before the first of each month with no grace period.

3. Subsequently, on or about November 27, 2019, an application for ejectment was filed by Respondent due to Lessee's breach of the Lease for failing to pay rent when due or demanded.

4. On January 24, 2020, the eviction hearing was conducted at the Catawba-Ebenezer Magistrate Court, Magistrate Stephanie A. Wood, presiding.

5. A judgment for the Respondent was entered granting Respondent's request for a Writ of Ejectment.

6. Pursuant to South Carolina Code Ann. § 27-40-800, a bond to stay hearing was conducted at the Catawba-Ebenezer Magistrate Court whereby the court set the bond at \$1,570 per month due on the 1<sup>st</sup> day of each month.

7. The Bond to Stay Execution on Appeal to Circuit Court also provided that "If Tenant fails to make any rental payment within five days of the due date, upon application of the Landlord, the stay of execution shall dissolve, the appeal by the Tenant to the circuit court on issues dealing with possession must be dismissed and the sheriff may dispossess the tenant."

8. On January 31, 2020, Lessee filed a notice of appeal with the Court of Common Pleas for York County (2020-CP-46-00381).

9. On February 12, 2020, the Court of Common Pleas issued an order denying Lessee's appeal based upon Lessee's failure to post an appeal bond within five (5) days after service of the Notice of Appeal as required by SC Code 27-37-130. See attached hereto the Order Dismissing Appeal file-stamped February 12, 2020 as **Exhibit A**.

10. On February 27, 2020, Lessee filed a subsequent notice of civil appeal with the Court of Common Pleas in York County (2020-CP-46-00782).

11. On March 5, 2020, the Court of Common Pleas issued an order denying Lessee's appeal based upon a lack of jurisdiction stating, in part, that the appeal was filed in regards to the dismissal of case 2020-CP-46-00381 and further stated that the Court of Common Pleas was not the appropriate court for an appeal of a Circuit Court Ruling. See attached hereto the Order Dismissing Appeal file-stamped March 5, 2020 as **Exhibit B**.

12. On March 16, 2020, Lessee filed a third notice of civil appeal with the Court of Common Pleas of York County (2020-CP-46-0145).

13. On March 20, 2020, Magistrate Clifford Berinksy issued a Return of Civil Appeal making note of the fact that the Notice of Appeal was not timely filed and served. See attached hereto the Return of Civil Appeal file-stamped March 20, 2020 as **Exhibit C**.

14. On July 28, 2020, a hearing was held at the Court of Common Pleas of York County the Honorable Daniel D. Hall presiding. Respondent appeared through undersigned counsel and Lessee appeared via telephone.

15. On July 30, 2020, the Court of Common Pleas issued a dismissal of Lessee's appeal based upon Lessee's failure to serve the magistrate with the notice of appeal within the statutorily prescribed period. See attached hereto the Order Dismissing Appeal file-stamped July 30, 2020 as **Exhibit D**.

16. On or about September 3, 2020, Appellant filed a notice of appeal with the South Carolina Court of Appeals appealing the Circuit Court's ruling/dismissal of his appeal for failure to comply and asking for the Court of Appeals to stay the eviction action.

17. On September 14, 2020, the South Carolina Court of Appeals issued a letter identifying certain and specific deficiencies within Lessee's Notice of Appeal which were to be corrected no later than September 24, 2020.

18. On October 1, 2020, Lessee attempted to cure the deficiencies identified in the letter dated September 24, 2020. However, Lessee has failed to provide a proof of service in the format shown by Form 7 in Appendix C to part II of the SCACR. Lessee has also failed to serve Respondent or Respondent's counsel of record with any pleadings during the course of this appeal.

19. On September 23, 2020, the South Carolina Court of Appeals issued a second letter informing Lessee that the time for ordering the transcript had expired. Lessee was further informed that he had ten (10) days to file a motion requesting permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules. The ten (10) days period expired on October 3, 2020.

20. On October 9, 2020, Lessee filed a purported 'Motion for Extension to Obtain Transcript' with the South Carolina Court of Appeals to cure the deficiencies outlined in the letter dated September 23, 2020. However, Lessee failed to provide the Court with a copy of the letter showing that he had ordered the transcript directly from the court reporter.

21. On October 15, 2020, the South Carolina Court of Appeals issued a third letter informing Lessee that deficiencies remained and he was required to 1) submit the filing fee in the amount of \$50.00; and 2) provide a proof of service of his Motion. These deficiencies were to be corrected no later than October 25, 2020. To date, Lessee has failed to serve Respondent or Respondent's counsel with any pleading or motion during the course of this appeal.

22. To date, Lessee has failed to cure the deficiencies outlined in the October 15, 2020 letter.

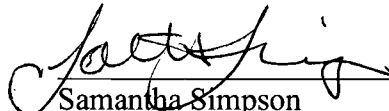
23. Further, SCACR Rule 241(b)(10) requires that Appellant meet a condition precedent to continue with his appeal by executing a bond or undertaking under South Carolina Code Ann. § 27-40-800 to keep his rent current while the appeal is pending.

24. To date, Lessee has failed to execute a bond as required.

25. Further, while Lessee has continued to reside at the Premises, Lessee has not paid any amount of funds towards his rent since a partial payment that was made on or about October 28, 2019.

Therefore, Respondent respectfully requests this Honorable Court dismiss Appellant's Appeal as Appellant has failed to meet conditions precedent by failing to comply with the terms of the aforementioned bond to stay, and has failed to cure deficiencies within his Appeal as noted by this Court. Respondent intends to go forward with the execution of the writ of ejectment and set-out, and Respondent believes that the denial of the motion to stay makes the appeal moot and makes a dismissal proper as the Notice of Appeal is an appeal of the appeal of the lower court's dismissal of the case as being moot for failing to comply with the terms of the bond to stay.

Respectfully submitted this 23<sup>rd</sup> day of November, 2020.

  
Samantha Simpson  
SC Bar No. 103965  
Brownlee Whitlow & Praet, PLLC  
1850 E. 3<sup>rd</sup> Street, Suite 350  
Charlotte, North Carolina 28204  
Telephone & E-Fax (704) 594-5558  
Email: [ssimpson@bwpf-law.com](mailto:ssimpson@bwpf-law.com)  
Attorney for Haven at Regent Park

FORM 4

STATE OF SOUTH CAROLINA  
 COUNTY OF YORK  
 IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE  
 CASE NUMBER 2020CP4600381

Timothy Saj

Haven At Regent Park

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for:  Plaintiff  Defendant  
 Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.  See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  
 Rule 43(k), SCRPC (Settled);  Other: \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j) SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other: \_\_\_\_\_
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other: Dismissed for Failure to Post Tenant Bond

FILED RECEIVED  
 2020 FEB 12 PM 1:06  
 DAVID HAMILTON  
 C.C.C.P. & OS  
 YORK COUNTY

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order; (formal order to follow)  Statement of Judgment by the Court:

ORDER INFORMATION

This order  ends  does not end the case.

Additional Information for the Clerk: A NOTICE OF APPEAL WAS FILED IN THE ABOVE REFERENCED MATTER ON JANUARY 31, 2020. APPELLANT TIMOTHY SAJ FAILED TO POST AN APPEAL BOND WITHIN (5) DAYS AFTER SERVICE OF THE NOTICE OF APPEAL AS REQUIRED BY THE SC CODE 27-37-130. THE STATUE CALLS FOR DISMISSAL BY THE TRIAL MAGISTRATE UPON FAILURE OF THE TENANT(S) TO FILE THE BOND. THEREFORE, THIS APPEAL IS DISMISSED, IT IS SO ORDERED.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

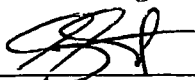
Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
N/A		

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk.

Note: Title abstractors and researchers should refer to the official court order for judgment details.

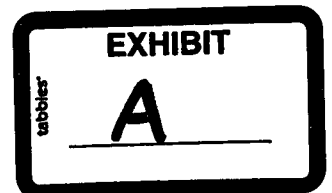
E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.



Stephanie Wood  
 Magistrate Court Judge

7313  
 Judge Code

2-7-20  
 Date



**For Clerk of Court Office Use Only**

This judgment was entered on February 7<sup>th</sup>, 2020 and a copy mailed first class or placed in the appropriate attorney's box on February 7<sup>th</sup> 2020 to attorneys of record or to parties (when appearing pro se) as follows:

Timothy Saj 3108 Cool Bridge Circle Fort Mill, SC 29715

Haven At Regent Park 3130 Cool Bridge Circle Fort Mill,  
SC 29715

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ATTORNEY(S) FOR THE PLAINTIFF(S)

---

ATTORNEY(S) FOR THE DEFENDANT(S)

David Hamilton

Court Reporter

David Hamilton - Clerk of Court

---

**Court Reporter:**

**E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.**

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**ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.**

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

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STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF YORK )

IN THE MAGISTRATES COURT

The Haven at Regent Park, )  
Appellant(s) )

**ORDER DISMISSING APPEAL**

vs. )

Common Pleas Case No. 2020CP4600381

Timothy Saj, )  
Respondant(s) )

Magistrate Case No. 2019CV4610401820

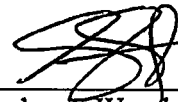
2020 FEB 12 PM 1:46  
DAVID SHAMILTON  
C. CO. P. & GS  
YORK COUNTY, SC

FILED-RECEIVED

This matter is on appeal from the Magistrate Court for Catawba/Ebenezer Townships, York County, South Carolina, Stephanie A. Wood, Presiding Judge. The court set the bond at \$1570 per month due on the 1<sup>st</sup> day of each month. The language of the "Bond to Stay Execution on Appeal to the Circuit Court" was taken directly from the statute according to Section 27-40-800. The court made every attempt to notify the defendant of the appeal bond hearing. The court left messages on his cell phone regarding the hearing on several occasions, taped a business card to his door with the court's contact information, and sent a letter in the mail. The eviction hearing was held on January 24, 2020 and the defendant was notified at that hearing that there would be a bond hearing once he filed the appeal. Although the defendant failed to appear or acknowledge the bond hearing on this appeal the defendant was given all pertinent information regarding the hearing before he filed the appeal. The defendant was also notified that the bond would be the rent as it came due after he filed the appeal. The defendant was also notified that if he failed to pay the rent as it came due that the Magistrate would have to dismiss his appeal. The Magistrate reiterated several times at the hearing on Jan. 24 that if the defendant failed to pay the rent as it came due that the appeal would be dismissed. He filed the appeal on January 31, 2020. The defendant has evaded any type of communication with the court after communicating almost daily with the court regarding this matter prior to the appeal. The defendant chose not to appear or acknowledge the hearing. Therefore, although a bond hearing was set it was not necessary as the defendant knew what was required of him before he filed the appeal. The

landlord notified the court on February 7, 2020 that the \$1570 was not paid for the month of February. According to section 27-37-130 "Bond required to stay ejectment on appeal" that "In the event the tenant shall fail to file the bond herein required within five days after service of the notice of appeal such appeal shall be dismissed by the trial magistrate." The defendant was already delinquent at least \$6012 before he missed the payment for his rent in February. Therefore, the court is dismissing the appeal.

Respectfully submitted,



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Stephanie Wood, Magistrate  
February 7, 2020

Timothy J Saj  
PLAINTIFF(S)

Haven At Regent Park  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other **Dismissed for Lack of Jurisdiction**

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

This matter was filed in regards to the dismissal of case 2020CP4600381 where appellant Saj failed to post an appeal bond. This is not the appropriate court for an appeal of a Circuit Court ruling. Therefore, this matter is dismissed by the Court for lack of jurisdiction, it is so ordered.

**ORDER INFORMATION**

This order  ends  does not end the case.  See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 03/05/2020 .

Timothy J Saj for Timothy J Saj  
Haven At Regent Park  
Timothy J Saj for Timothy J Saj

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**



**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

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York Common Pleas

**Case Caption:** Timothy J Saj VS Haven At Regent Park

**Case Number:** 2020CP4600782

**Type:** Order/Electronic Form 4

So Ordered

s/Daniel D. Hall 2753

FILED-RECEIVED

STATE OF SOUTH CAROLINA )  
 COUNTY OF YORK ) 2020 MAR 20 AM 11:18 IN THE MAGISTRATES COURT

DAVID HAMILTON  
 C.C.C.P. & GS  
 YORK COUNTY, SC

Timothy J. Saj, )  
 Appellant ) RETURN OF CIVIL APPEAL

vs. ) Common Pleas No. 2020CP4601045

The Haven at Regent Park )  
 Respondent ) Magistrate Civil No. 2019CV4610401820

This matter is on appeal from the Central Civil Magistrate Court, York County, South Carolina, Clifford E. Berinsky, Presiding Judge.

**UNTIMELY SERVICE OF NOTICE OF APPEAL:**

The Court has made note of the fact that the Notice of Appeal was not timely filed and served. The Notice of Appeal, which was filed with the Clerk of Court on March 16, 2020, and served on the Magistrate on March 17, 2020, states that Defendant received personal notice of the judgment on January 17, 2020.

“The Appellant, within thirty days after written notice of judgment has been given him or his attorney by the magistrate,...except when the judgment is announced at the trial in the presence of the appellant or his attorney then no written notice is necessary, shall serve a notice of appeal....” S.C. Code Ann. 18-7-20. “[T]he notice of intention to appeal shall be filed with the clerk of court to which the appeal is taken and with the inferior court or administrative agency or tribunal within the time provided by the statute, for service of notice of intention to appeal.” The Plaintiff’s Notice of Appeal was received by the magistrate’s office on March 17, 2020, which is fifty-nine (59) days after Defendant’s acknowledged receipt of personal notice of the judgment.

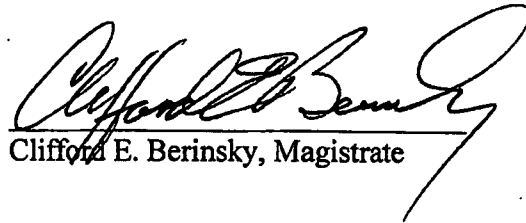
Failure to serve the magistrate with notice of appeal within the statutorily required period is fatal, and the Circuit Court must dismiss the appeal, being without jurisdiction to hear same. Scott v. Pratt, 9 SC 82 (1878); Davis v. Vaughn, 7 SC 342 (1876); Foot & Son v. Williams, 18 SC 601 (1883); Manuel v. Loveless, 56 SC 426, 35 SE 1 (1900); Inabinet v. Housing Authority of Columbia, 270 SC 509, 242 SE2d 905 (1978). A



party's timely service of notice of appeal is a jurisdictional requirement that cannot be waived or extended. State of South Carolina v. Joseph T. McQuatters, S.C. Court of Appeals, Unpublished Opinion No. 21001-UP-307, heard May 7, 2001 – filed June 4, 2001; Hooper v. Rockwell, 334 S.C. 281, 513 S.E.2d 358 (1999); Mears v. Mears, 287 S.C. 168, 169, 337 S.E.2d 206, 207 (1985) (stating “{s}ervice of the notice of intent to appeal is a jurisdictional requirement, and this Court has no authority to extend or expand the time in which the notice of intent to appeal must be served.”).

Should the Court of Common Pleas feel that a further, more detailed return is necessary, this Court will file a more detailed and complete amended return.

Respectfully submitted,



Clifford E. Berinsky, Magistrate

March 17, 2020

Timothy J Saj  
PLAINTIFF(S)

Haven At Regent Park  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other **DISMISSED**

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

After careful consideration, the appeal is DISMISSED. Appellant failed to serve the magistrate with notice of appeal within the statutorily prescribed period.

**ORDER INFORMATION**

This order  ends  does not end the case.

See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 07/30/2020 .

Timothy J Saj for Timothy J Saj  
Timothy J Saj for Timothy J Saj

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**



**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

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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,

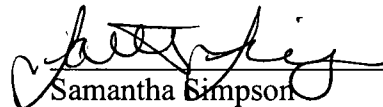
Respondent,

PROOF OF SERVICE

I certify that I have served **Respondent's Memo in Support of 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 23<sup>rd</sup> day of November, 2020.



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

# Brownlee Whitlow & Praet, PLLC



1850 E. 3<sup>rd</sup> Street, Suite 350  
Charlotte, NC 28204  
Telephone: (704) 247-4998  
Facsimile: (704) 594-5558

Samantha Simpson  
Direct Phone: (704) 594-5558  
Email: [ssimpson@bwpf-law.com](mailto: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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NOV 24 2020

SC Court of Appeals

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

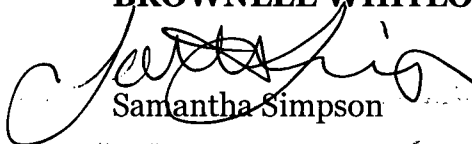
Dear Ms. Kitchings,

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

SHIP DATE: 23NOV20  
ACTWGT: 1.12 LB  
CAD: 108681757/INET4280

1850 E. 3RD ST.  
SUITE 350  
CHARLOTTE, NC 28204  
UNITED STATES US

BILL SENDER

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

**COLUMBIA SC 29201**

(803) 734-1890

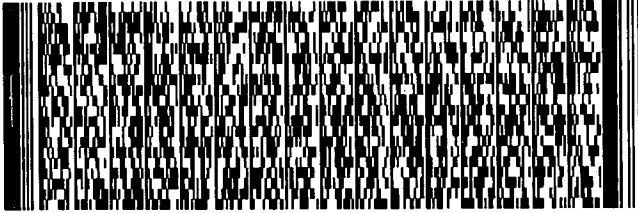
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INV:  
PO:

DEPT:

56B J5/BAB9/B766

FedEx Ship Manager - Print Your Label(s)



**FedEx**  
Express



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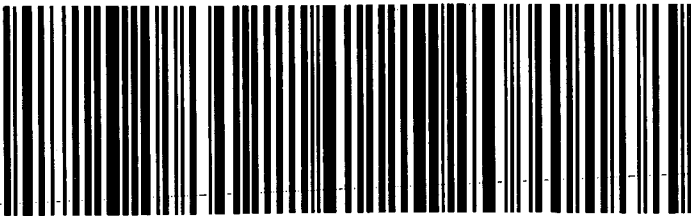
STANDARD OVERNIGHT

TRK#  
0201

NOV 24 2020  
7721 6234 2828  
SC Court of Appeals

**GE USCA**

29201  
SC-US CAE



11/23/2020