

RECEIVED**Mar 02 2021****SC Court of Appeals**

specifically including joint income tax returns with my spouse, claims for refund, requests for extension of time and consents in my name; to receive, endorse, and receipt for any tax refunds due to me; and to pay, compromise, or contest any taxes, penalties, or interest for which I am or may be liable.

13. POWER TO FUND AND CREATE TRUSTS. To add any property whatsoever belonging to me to any trust established by me, before or after the execution of this instrument, to be held and managed as though an original part of such trust, and to create any type of trust, including a Renunciation Trust, funded by any and all of my assets, and to execute such instruments, documents and papers to effect the transfers described herein as may be necessary or appropriate.

14. MAKE GIFTS. To make gifts to persons or institutions, including to the attorney-in-fact named in this power of attorney. This power is limited to gifts that qualify for the federal gift tax annual exclusion, shall not exceed in value the federal gift tax annual exclusion amount in any one calendar year. Such gifts may be made in the sole discretion and judgement of the attorney-in-fact for tax benefit to me or my estate or for any other reason. I grant my attorney-in-fact the power to make gifts on my behalf even though I may not have had a history of prior gift giving.

15. INSURANCE TRANSACTIONS. To exercise any right or obligation in regard to any insurance policy of any kind whatsoever in which I have any incident of ownership; to obtain additional contracts of insurance for me; and to designate the beneficiaries of such insurance contracts, provided, however that the agent himself cannot be such beneficiary unless the agent is spouse, child grandchild, parent, brother or sister of the principal. The foregoing powers shall apply to private and public plans, including but not limited to Medicare, Medicaid, SSI and Worker's Compensation.

16. ESTATE AND TRUST TRANSACTIONS. To request, demand, sue for, recover, collect, and hold, or to disclaim or renounce as provided by law, any interest that I have or may have in any estate or trust, to execute and deliver any receipts, releases, or other instruments in connection with any such interest, and to exercise in whole or in part, release or let lapse any power of appointment held by me, whether general or special, or any power of amendment or revocation under any trust, subject only to any restrictions upon such exercise imposed upon my attorney-in-fact as set forth in other provisions of this instrument. I specifically authorize my attorney-in-fact to renounce any or all interest I may have in an estate pursuant to a Renunciation Trust provision for any purposes deemed proper in the exclusive discretion of the attorney-in-fact.

17. BUSINESS TRANSACTIONS. To conduct, engage in, and transact any and all lawful business of whatever nature or kind in which I am engaged or interested.

18. IMPLEMENT FOREGOING POWERS. To sign any and all contracts, deeds, or other instruments necessary to carry out any of the aforementioned powers, hereby giving and granting unto my attorney full power and authority to do and perform all and every act and thing whatsoever

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requisite and necessary to be done in implementing such powers as fully to all intents, and purposes as I might or could do if personally present, with full power to substitute in my place and stead.

19. PERSONAL RELATIONSHIPS AND AFFAIRS. To do all acts necessary for maintaining my customary standard of living and the customary standard of living of my spouse, my children and my other dependents; to provide medical, dental, and surgical care, hospitalization and custodial care for me, my spouse, my children and my other dependents; to continue whatever provision has been made by me for me, my spouse, my children, and my other dependents, with respect to automobiles, or other means of transportation; to continue whatever charge accounts have been operated by me for my convenience, and the convenience of my spouse, my children and my other dependents, to open such new accounts as my attorney shall think to be desirable for the accomplishment of any of the purposes enumerated in this paragraph, and to pay the items charged on such accounts by any person authorized or permitted by me or my attorney to make such charges; to continue the discharge of any services or duties assumed by me, to any parent, relative or friend of mine; to continue paying incidental to my membership or affiliation in any church, club, society, order or other organization, or to continue contributions thereto.

PART III - ADMINISTRATION

A. COMPENSATION. My attorney shall serve without bond and shall receive and be paid such commissions as are allowable under the North Carolina General Statutes in effect at the time any services hereunder are rendered.

B. REVOCATION OF PRIOR POWERS OF ATTORNEY. All Durable Powers of Attorney for Financial Management heretofore filed or executed by me are hereby revoked. This Power of Attorney does NOT revoke any Durable Power of Attorney for Health Care previously executed by me.

C. RECORDATION, INVENTORY AND ACCOUNTING. My attorney-in-fact shall not be required to file this document with the Clerk of Superior Court nor to file inventories or accounts with said Clerk, but shall keep full and accurate records of all transactions for me hereunder and render the same to me at least annually, if I am competent, or to my spouse, oldest adult child or nearest living relative (in that order), should I become incompetent or incapacitated.

D. RATIFICATION. I do hereby ratify and confirm all things so done by my attorney within the scope of the authority herein given my attorney as fully and to the same extent as if by me personally done.

E. NOMINATION OF GUARDIAN. If at any time following the execution of this Power of Attorney, a court appoints a guardian of my estate or a general guardian, I request that the court making such appointment consider my attorney nominated hereunder to serve as such guardian of my estate or general guardian.

F. EFFECTUATION. The terms of this document shall not become effective until a medical practitioner, licensed in the State of North Carolina, shall issue a statement, a dated copy of which must accompany this document, to the effect that I am no longer able to handle my own affairs.

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G. SEVERABILITY. If any part of any provision of this instrument shall be invalid or unenforceable under applicable law, such part shall be ineffective to the extent of such invalidity only, without in any way affecting the remaining parts of such provision or the remaining provisions of this instrument.

THIS POWER OF ATTORNEY IS EXECUTED PURSUANT TO THE PROVISIONS OF NORTH CAROLINA GENERAL STATUTES SECTION 32A-8, AND IT SHALL NOT BE AFFECTED BY MY SUBSEQUENT INCAPACITY OR MENTAL INCOMPETENCE.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 4TH day of November 2002.

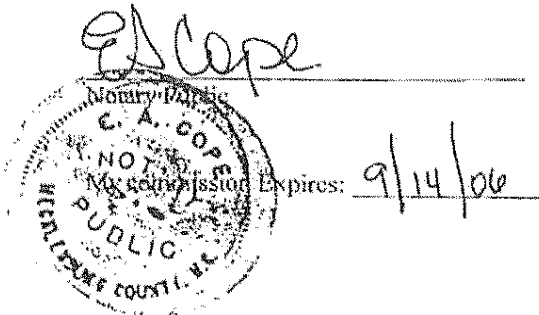
Chris Combis (SEAL)
Chris Combis

NORTH CAROLINA

MECKLENBURG COUNTY

I, E A Cope, a Notary Public in and for the State and County aforesaid, hereby certify that Chris Combis personally appeared before me this day and acknowledged the due execution of the foregoing Durable Power of Attorney for the purposes therein expressed.

WITNESS my hand and notarial seal this 4th day of Nov. 2002.



[NOTARY SEAL]

Combis00033

ROA 0927



REDDING | JONES

August 14, 2017

Via Hand Delivery

Desa Ballard
Ballard & Watson, Attorneys at Law
Post Office Box 6338
West Columbia, South Carolina 29169

Re: *Per Rep. Desa Ballard v. George Combis,
Lancaster County (Case No. 2014CP2900306)*

Dear Ms. Ballard:

In response to your Subpoena dated March 16, 2017, our office is producing the following items (the "Items") for appraisal:

- Four rolls of pennies
- Ten sealed packages of various coins
- Five blue encased coins
- One firearm
- One holster
- One empty detachable magazine
- One Rolex watch

Photographs of the aforementioned Items are attached hereto. Please note that the Combis' are not waiving any rights with respect to these Items, including but not limited to the ownership of this property. Pursuant to the Court's order, please contact me once the appraisal is concluded so we can coordinate the return of the Items.

Sincerely,

REDDING | JONES, PLLC

Joseph R. Pellington

/mr

Cc: George Combis, via (Via email)

Enclosures

Redding Jones, PLLC
2907 Providence Road, Suite A303
Charlotte, North Carolina 28211
ROA 0928

 REDDING | JONES

By signing below, I am acknowledging receipt of the Items.

Name:

Beth Cogan

Signature:

Beth K Cogan

Date:

8/14/17

Redding Jones, PLLC
2907 Providence Road, Suite A303
Charlotte, North Carolina 28211
ROA 0929

PENGAD 800-631-6989

EXHIBIT

Respondent's

11-14-17



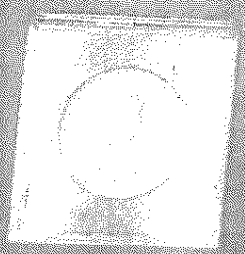
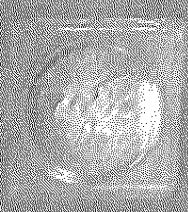
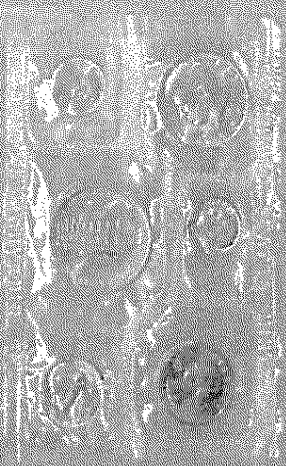
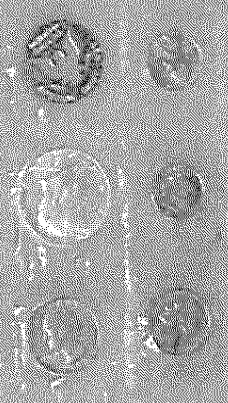
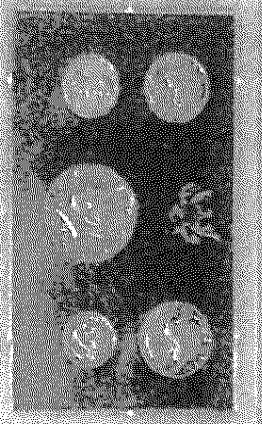
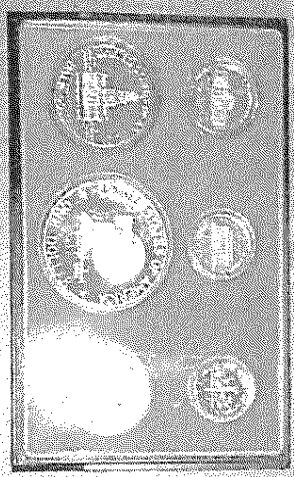
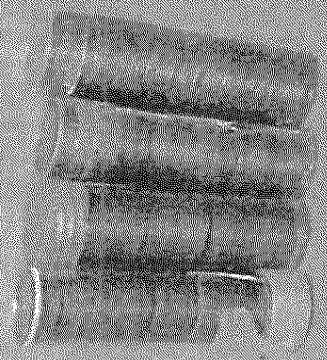
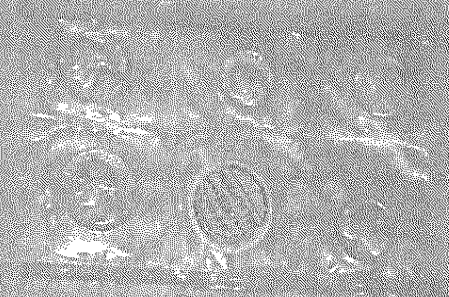
ROA 0930



ROA 0931



ROA 0932



Truslow & Truslow

Attorneys At Law

www.truslowlaw.com

Telephone: 803-256-6276 Fax: 803-256-7659

Douglas N. Truslow
douglastruslow@truslowlaw.com

Neal D. Truslow
nealtruslow@truslowlaw.com

Physical Address:
914 Richland Street, Suite B-102
Columbia, SC 29201

Mailing Address:
P.O. Box 1465
Columbia, SC 29202

August 24, 2017

RE: Desa Ballard, as PR of the Estate of Chris Combis v. George Combis, Diane Combis, and Chris A. Combis
2014-CP-29-00306

Honorable Brian M. Gibbons
Judge of the Sixth Judicial Circuit
P.O. Drawer 580
Chester, SC 29706

Dear Judge Gibbons:

On August 9, 2017, you entered an Order in the above referenced matter compelling George Combis, Diane Combis and Chris A. Combis to comply with a Subpoena issued by Desa Ballard as Personal Representative of the Estate of Chris Combis, which estate and associated case were transferred to the Circuit Court by the Probate Court.

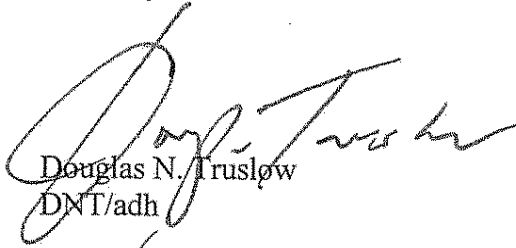
An ostensible delivery of items required to be produced was made, however, Ms. Ballard possesses considerable evidence that at least one valuable item is clearly a fake. With other items, there clearly appears to be less than full compliance. Mr. Nosal advises that his clients concur and support what Ms. Ballard asserts.

Ms. Ballard is seeking a Rule to Show Cause. Because of the nature of the dispute, I will now be appearing on behalf of Ms. Ballard.

I am sending the original Petition for Rule to Show Cause to the Clerk for filing along with a proposed Order and Verification of Ms. Ballard with Exhibits and asking him to forward it to you for your consideration.

I would ask that you please review the enclosed copies and if you find them acceptable, execute the original upon its delivery and schedule a hearing for same, returning the clocked and scheduled copies in the self-addressed and stamped envelope enclosed so that they may be duly served.

Sincerely,



Douglas N. Truslow
DNT/adh

cc: ✓ Joseph Pellington, Esquire
Peter J. Nosal, Esquire
Jeff Hammond, Clerk of Court
Client (via email)

STATE OF SOUTH CAROLINA
ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF LANCASTER

Desa Ballard, Plaintiff

v.

SUBPOENA IN A CIVIL CASE

George Combis, Defendant

Case Number: 2014-CP-29-00306

Pending in Lancaster County

TO: Chris A. Combis, 5814 Bentway Drive, Charlotte, NC 28226☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

AM

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME October 17, 2017, 12:00 PM

Regus

3440 Toringdon Way, Suite 205

Charlotte, NC 28277

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents or objects:

Please see attached.

PLACE

DATE AND TIME October 17, 2017, 12:00 PM

Regus

3440 Toringdon Way, Suite 205

Charlotte, NC 28277

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

AM

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Attorney/Issuing Officer's Signature

Date

Douglas N. Truslow

Print Name

Indicate if Attorney for Plaintiff or Defendant

Attorney's Address and Telephone Number:

Douglas N. Truslow, Attorney for Plaintiff

P.O. Box 1465, Columbia, SC 29202; 803-256-6276

PROOF OF SERVICE

SERVED	DATE <u>10-4-2017</u>	FEES AND MILEAGE TO BE TENDERED TO WITNESS UPON DAILY ARRIVAL ☐ YES ☒ NO AMOUNT \$
	PLACE <u>5814 Brentway Dr. Charlotte, NC</u>	
SERVED ON <u>Chris A. Conb's</u>	MANNER OF SERVICE <u>Personally</u>	
SERVED BY <u>Dawn Smith</u>	TITLE <u>Process Server</u>	

DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.
 Executed on 10-4-17 Dawn Smith
 SIGNATURE OF SERVER

ADDRESS OF SERVER

Bernard Investigations
 PO Box 16
 Rock Hill, SC 29731
803-980-4643

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises—or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance; or

(ii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or

(iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena:

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1)(A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

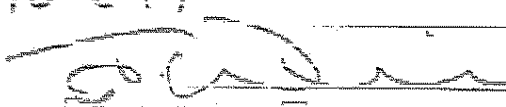
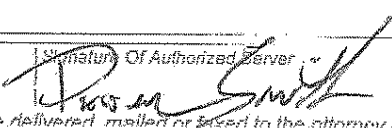
(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(6)(B). The court may specify conditions for the discovery.

(2)(A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, the receiving party must take reasonable steps to retrieve the information. The person who produced the information must preserve the information until the claim is resolved.

STATE OF NORTH CAROLINA		File No. 17 CVS 17874	
Mecklenburg County		In The General Court Of Justice ☐ District ☒ Superior Court Division	
Dora Ballard		Additional File Numbers	
VERSUS		SUBPOENA	
George Combis			
G.S. 1A-1, Rule 45, G.S. 6-			
Party Requesting Subpoena ☒ State/Plaintiff ☐ Defendant		NOTE TO PARTIES NOT REPRESENTED BY COUNSEL: Subpoenas may be furnished at your request, but must be signed and issued by the office of the Clerk of Superior Court, or by a magistrate or judge.	
TO Name And Address Of Person Subpoenaed Chris A. Combis 5814 Dantway Dr. Charlotte, NC 28226		Alternate Address	
Telephone No.		Telephone No.	
YOU ARE COMMANDED TO: (check all that apply) ☐ appear and testify, in the above entitled action, before the court at the place, date and time indicated below ☒ appear and testify, in the above entitled action, at a deposition at the place, date and time indicated below. ☒ produce and permit inspection and copying of the following items, at the place, date and time indicated below. ☒ See attached list. (List here if space sufficient) Please see the attached Subpoena and Subpoena Duces Tecum from the State of South Carolina (civil action: 2017-CP-20-00306 and the attached list for production for inspection.			
Name And Location Of Court/Place Of Deposition/Place To Produce Rogus 3440 Toringdon Way, Suite 200 Charlotte, NC 28277		Date To Appear/Produce, Until Released 10/17/2017 Time To Appear/Produce, Until Released 12:00 ☐ AM ☒ PM Date 10-2-17 Signature  ☐ Deputy USC ☐ Assistant USC ☐ Clerk Of Superior Court ☐ Magistrate ☐ Attorney/DA ☐ District Court Judge ☐ Superior Court Judge	
Name And Address Of Applicant Or Applicant's Attorney C.O. (Ladd) Ackerman Ackerman Law Firm, P.A. 3300 Shopton Rd. Charlotte, NC 28217 Telephone No. Of Applicant Or Applicant's Attorney (704) 522-7733			
RETURN OF SERVICE			
I certify this subpoena was received and served on the person subpoenaed as follows: By ☒ personal delivery. ☐ registered or certified mail, receipt requested and attached. ☐ telephone communication by Sheriff (use only for a witness subpoenaed to appear and testify) ☐ telephone communication by local law enforcement agency (use only for a witness subpoenaed to appear and testify in a criminal case) NOTE TO COURT: If the witness was served by telephone communication from a local law enforcement agency in a criminal case, the court may not issue a show cause order or order for arrest against the witness until the witness has been served personally with the written subpoena. ☐ I was unable to serve this subpoena. Reason unable to serve:			
Service Fee ☐ Paid ☐ Due		Date Served 10-4-17 Name Of Authorized Server (type or print) Dalene Smith Signature Of Authorized Server  Title Process Server	
NOTE TO PERSON REQUESTING SUBPOENA: A copy of this subpoena must be delivered, mailed or faxed to the attorney for each party in this case. If a party is not represented by an attorney, the copy must be mailed or delivered to the party. This does not apply in criminal cases. AOC-G-100, Rev. 8/17 (Please see reverse side)			
Bernard Investigations PO Box 16 Rock Hill, SC 29734			

ROA 0939

 REDDING | JONES

November 20, 2017

Shirley G. Broom
502 Unity Street
Fort Mill, SC 29715-1830

*Re: Desa Ballard v. George Combis
Case No.: 2014-CP-29-306 County of Lancaster*

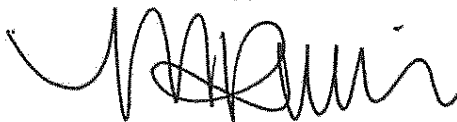
Dear Shirley:

Our office would like to make a formal request for a copy of a transcript for a hearing regarding the above referenced matter, which took place on November 17, 2017 at 9:30 am at the Lancaster Courthouse. The Honorable Brian M. Gibbons was the judge who presided over the hearing.

Please advise of the cost of the transcript and I will issue payment accordingly. I appreciate your time and attention to this matter. Don't hesitate to contact me if you have any questions.

Sincerely,

REDDING | JONES, PLLC



Marisol Rivera

/mr

REDDING JONES, PLLC
2907 Providence Road, Suite A303
Charlotte, NC 28211
www.reddingjones.com

ROA 0940

Common Pleas Non-Jury/General Sessions Non-Jury

Judge: Gibbons, Brian M.

Circuit No: 6

Start Date: 11-13-2017

End Date: 11-17-2017

Court Reporter(s): Shirley Broom

11/17/2017 Hearing 9:30 am

Shirley G. Broom

502 Unity Street

Fort Mill, SC 29715-1830

County: York (Circuit: 16)



South Carolina Law Enforcement Division Case Status Report

INFORMATION DESCRIPTION			CASE NUMBER	32-17-0135
OPEN ☐ Active ☐ Under Pros. Review ☐ Suspended ☐ Awaiting Court Opening Date <u>11-17-2017</u>	COMPLETED Date <u>07-20-2018</u> ☐ Declined ☐ Adjudicated ☐ Ex. Cleared	CLOSED ☒ Unfounded ☐ Declined ☐ Adjudicated ☐ Ex. Cleared	Cross Ref. No Character <u>10</u> Character Details	
			Closing Date <u>07-20-2018</u>	Lab Number

<u>Blake, K. N.</u>		<u>Horton, D.</u>
Case Agent (last name, initials)	Assisting Agent (last name, initials)	Supervisor (last name, initials)
Requesting Agency <u>6th Judicial Circuit</u>		Name <u>Judge Brian Gibbons</u>
SLED Authority <u>Capt. John Bishop</u>		Date Received <u>11-17-2017</u>
Incident Date		Incident Location <u>Lancaster</u>

Subject (last name, first name, middle initial) <u>Combis, George</u> <u>Combis, Diane</u> <u>Combis, Chris</u>	Victim (last name, first name, middle initial) <u>Estate of Chris "Pops" Combis</u>
Subject Vehicle(s):	

Remarks:

On November 17, 2017, the South Carolina Law Enforcement Division (SLED) received an emailed request from Judge Brian Gibbons of the 6th Judicial Circuit to conduct an investigation into the possible breach of trust of funds and other items from the estate of Chris "Pops" Combis by the listed subjects.

A review of the court transcripts, and exhibits presented during depositions, was conducted.

Based on the information obtained during the investigation, the determination was made there were no criminal charges to be made.

The findings were discussed with Judge Gibbons, who did not request any further investigation into the matter. Materials obtained pursuant to this investigation are maintained with this case file for reference.

This case is closed.

Approved Supervisor: [Signature]

Approved Admin. Supervisor: [Signature]

Date: 7/25/18

Date: 5/25/18

Court
Exhibit



South Carolina Law Enforcement Division Case Status Report

INFORMATION DESCRIPTION			CASE NUMBER	32-17-0135
OPEN ☐	COMPLETED ☐	CLOSED ☐	Cross Ref. No	
☒ Active	Date	☐ Unfounded	Character	10
☐ Under Pros. Review		☐ Declined	Character Details	
☐ Suspended		☐ Adjudicated		
☐ Awaiting Court		☐ Ex. Cleared		
Opening Date	11/17/2017	Closing Date		Lab Number

Blake, K.		Horton, D.
Case Agent (last name, initials)	Assisting Agent (last name, initials)	Supervisor (last name, initials)

Requesting Agency 6 th Judicial Circuit	Name Judge Brian Gibbons
SLED Authority Capt. John Bishop	Date Received 11/17/2017
Incident Date	Incident Location Lancaster

Subject (last name, first name, middle initial)	Victim (last name, first name, middle initial)
Combis, George	Estate of Chris "Pops" Combis
Combis, Diane	
Combis, Chris A.	
Subject Vehicle(s):	

Remarks:

On November 17, 2017, the South Carolina Law Enforcement Division (SLED) received an emailed request from Judge Brian Gibbons of the 6th Judicial Circuit to conduct an investigation into possible breach of trust of funds and other items from the estate of Chris "Pops" Combis by the listed subjects.

Approved Supervisor: [Signature]
Approved Admin. Supervisor: _____

Date: 11/17/2017
Date: _____

Blake, Kevin

From: Horton, Derrick
Sent: Friday, November 17, 2017 3:33 PM
To: Blake, Kevin
Subject: FW: Lancaster/Mecklenburg referral

From: Bishop, John
Sent: Friday, November 17, 2017 2:56 PM
To: Baker, Kevin W
Cc: Williams, Gianna; Smith, Jeremy; Horton, Derrick
Subject: FW: Lancaster/Mecklenburg referral

Kevin,
Here is case request we talked about. Gianna please open a case out of Lancaster for Breach of trust in Kevin's name. I would contact Hal Gregory on Monday and he can help set a time with the judge to review the entire complaint and figure out a direction to start.
John

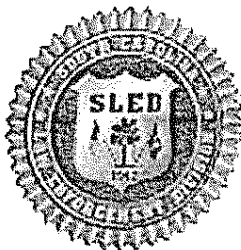
John Bishop, Captain
SLED Investigative Services
Phone (803) 896-7250
jbishop@sled.sc.gov



From: Robertson, Tommy
Sent: Friday, November 17, 2017 2:21 PM
To: Bishop, John
Subject: FW: Lancaster/Mecklenburg referral

Captain Thomas H. Robertson
Investigative Services
SLED Headquarters

Office: (803) 737-9000



From: Gibbons, Brian M. [mailto:BGibbonsj@sccourts.org]
Sent: Friday, November 17, 2017 2:10 PM
To: Robertson, Tommy
Cc: Gibbons, Brian Law Clerk (William C. Corbett)
Subject: Lancaster/Mecklenburg referral

Tommy, thanks for your call. Here's what happened:

I am presiding over a hotly contested Estate matter pending in Lancaster Common Pleas Court. (Estate of Chris "Pop" Combis). Mr. Combis died back in 2009 and his estate still has not been settled. It has been very acrimonious to say the least. There are 3 heirs, two daughters represented by Pete Nosal of Charlotte and a son (George). George's wife (Diane) and their son Chris A are also involved. These three are currently represented by Joe Pellington of Charlotte. Desa Ballard, lawyer in West Columbia, is the court appointed PR and trustee. She's represented by Doug Truslow of Columbia. The two sisters are teamed up against George, Diane, and Chris A. These are the players in this nasty mess.

They've been to NC courts, appellate courts, Federal Court in SC (Judge Joe Anderson), US Court of Appeals etc.....anyway, I'm presiding over this contempt action brought by Ms. Ballard on behalf of the Estate against George, Diane, and Chris A. The hearing centers around a Rolex watch or watches, various antique or nice firearms, and an apparently expansive coin collection which allegedly had been hidden and not turned over for an accounting by the Estate. During the hearing I learn that several hundred thousand dollars may have also been secreted from Pop's business, Superior Tile in Charlotte. Also, I hear about George walking around with copious amounts of cash...10s of thousands of dollars and allegations of safes being broken into and stuff being stolen. There was also sworn testimony of concealing and converting estate assets. George's demeanor and behavior in the courtroom also concerned me.

While this is a civil action seeking a contempt order and sanctions, there comes a point where I've heard enough to stop the proceeding and order that a criminal investigation be conducted, because what I had heard so clearly establishes probable cause for possible criminal charges of Breach of Trust, Criminal Conspiracy, Perjury, Safecracking, and tax evasion. As a Circuit Judge, I cannot just let testimony like this go. So, I stayed the hearing in an abundance of caution and had Hal Gregory, retired SLED agent and current bailiff in Lancaster, contact y'all to investigate as y'all may deem appropriate. As I told the lawyers and the parties, civil contempt requires clear and convincing evidence, criminal contempt requires beyond a reasonable doubt evidence, but allegations of criminal activity to warrant a criminal investigation or charge requires probable cause. So that's the deal. Contact me further if you need any more information.

Brian M Gibbons
Resident Circuit Judge
Sixth Judicial Circuit

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this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



## CASE MANAGEMENT HISTORY

|             |                                   |              |                                                                                      |
|-------------|-----------------------------------|--------------|--------------------------------------------------------------------------------------|
| AGENT:      | Kevin Blake<br>Lt. Derrick Horton | CASE NUMBER: | 32-17-0135<br>Estate of Combis, Chris<br>"Pops"<br>Requestor Judge Gibbons,<br>Brian |
| SUPERVISOR: | Lancaster                         | VICTIM:      | Combis, George<br>Combis, Diane<br>Combis, Chris A.                                  |
| COUNTY:     |                                   | SUBJECT:     |                                                                                      |

| DATE     | ACTION TAKEN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11-17-17 | <p>1600 – SLED Captain John Bishop contacted S/A Blake and advised to contact Hal Gregory [REDACTED] on Monday, 11-20-17, to set up a meeting regarding a Breach of Trust investigation in Lancaster.</p> <p>Initial information was provided in which Judge Brain Gibbons [REDACTED], 6<sup>th</sup> Judicial Circuit, requested SLED conduct an investigation after he was made aware of possible criminal activity stemming from a civil case he was presiding over, in which family members of the deceased, Chris "Pop" Combis, possibly conducted the following criminal acts: breach of trust, criminal conspiracy, perjury, safecracking and tax evasion.</p> <p>Additional point of contact was listed as Cyrus Corbett [REDACTED], Law Clerk</p> |
| 11-20-17 | <p>0930 – S/A Blake contacted Hal Gregory who advised to contact Cyrus Corbett for information.</p> <p>0940 – S/A Blake contacted Cyrus Corbett who advised Judge Gibbons would be available to meet at 1100.</p> <p>1100 – S/A Blake met with Judge Gibbons and his Law Clerk, Corbett. There was no specific information provided during the meeting to establish that a crime had occurred. S/A Blake requested court records, and contact information for the respective parties, along with their attorneys, in order to gather additional information.</p>                                                                                                                                                                                           |
| 11-27-17 | <p>1115 – S/A Blake attempted to contact Cyrus Corbett regarding the court documents and contact information for the involved parties' respective attorneys. A voice message was left.</p> <p>1215 – S/A Blake made contact with Desa Ballard, attorney for the estate, and set a meeting for Wednesday, 11-29-17 at 1300. She advised she would email documents to review prior to the meeting.</p>                                                                                                                                                                                                                                                                                                                                                       |
| 11-29-17 | <p>S/A Blake contacted Ballard's office and advised the meeting would have to be rescheduled.</p> <p>1500 – S/A Blake received an email from Ballard's office that contained depositions and</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



## CASE MANAGEMENT HISTORY

|             |                                   |              |                                                                                      |
|-------------|-----------------------------------|--------------|--------------------------------------------------------------------------------------|
| AGENT:      | Kevin Blake<br>Lt. Derrick Horton | CASE NUMBER: | 32-17-0135<br>Estate of Combis, Chris<br>"Pops"<br>Requestor Judge Gibbons,<br>Brian |
| SUPERVISOR: | Lancaster                         | VICTIM:      | Combis, George<br>Combis, Diane<br>Combis, Chris A.                                  |
| COUNTY:     |                                   | SUBJECT:     |                                                                                      |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | additional information from both Federal Court and 6 <sup>th</sup> Circuit Court hearings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 12-01-17 | S/A Blake reviewed the depositions and documents provided by Ballard's office.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 12-05-17 | Case review: Agent to meet with SLED legal counsel for consultation on this case. JB                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 12-15-17 | <p>1400 – S/A Blake met with Ballard and Truslow and discussed the case. Ballard provided additional information regarding the Rolex watches mentioned in the transcripts and depositions. Based on the information S/A Blake contacted Sumpter's Fine Jewelry and Watches in Charlotte and requested account information.</p> <p>Truslow provided information about the .25 cal pistol presented in court. S/A Blake requested ser #'s and information about the pistols mentioned in court to follow-up with the ATF.</p>                                                                                                                                                                                                                          |
| 12-18-17 | <p>1345 – S/A Blake drafted a letter to Hal Sumpter Sr. and requested information for Chris Combis, George Combis, Diane Combis, Chris Allen Combis, Superior Tile and Black Horse Run Property Owners Association.</p> <p>S/A Blake received an email from Truslow with the firearm information.</p> <p>1530 – S/A Blake spoke with Adam Whitsett about the transcript requests.</p>                                                                                                                                                                                                                                                                                                                                                                |
| 12-20-17 | <p>S/A Blake drafted letters requesting copies of transcripts for hearing before Judge Gibbons, and sent them to Michael Watkins for July 31, 2017 and Shirley Broom for November 14 and 17, 2017.</p> <p>Broom later responded and indicated she was the court report for one hearing on November 17, 2017 and provided the name of April Herron as the other reporter for November 14, 2017. She indicated she would draft an invoice that would need to be paid prior to sending the transcript.</p> <p>Watkins responded via email and advised he had not edited a final draft of the transcript and would be able to send an invoice and transcript sometime in January 2018.</p> <p>S/A Blake continued to review current court documents.</p> |



## CASE MANAGEMENT HISTORY

|             |                                   |              |                                                                                      |
|-------------|-----------------------------------|--------------|--------------------------------------------------------------------------------------|
| AGENT:      | Kevin Blake<br>Lt. Derrick Horton | CASE NUMBER: | 32-17-0135<br>Estate of Combis, Chris<br>"Pops"<br>Requestor Judge Gibbons,<br>Brian |
| SUPERVISOR: | Lancaster                         | VICTIM:      | Combis, George<br>Combis, Diane<br>Combis, Chris A.                                  |
| COUNTY:     |                                   | SUBJECT:     |                                                                                      |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12-21-17 | <p>S/A Blake sent a letter to Herron requesting a copy of the transcript for the November 14, 2017 hearing for which she was the court reporter.</p> <p>S/A Blake continued to review court documents.</p>                                                                                                                                                                                                                                                                     |
| 12-27-17 | <p>There has been no response from Herron. Another email was sent requesting an update.</p> <p>S/A Blake continued to review court documents.</p>                                                                                                                                                                                                                                                                                                                              |
| 12-28-17 | <p>1030 – Hal Sumpter Sr. contacted S/A Blake and advised he was going to start compiling the requested records going back 10 years, and call when they were ready to be picked up.</p>                                                                                                                                                                                                                                                                                        |
| 01-03-18 | <p>1630 – S/A Blake received a call from Brooms who advised she was going to email the invoice for the transcript.</p> <p>Brooms advised she had spoken to Herron who indicated she was aware that I needed her to make contact, but she was too busy.</p>                                                                                                                                                                                                                     |
| 01-04-18 | <p>0945 – S/A Blake forwarded the email with the invoice to Whitsett.</p>                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1/11/18  | <p>CR: Awaiting court transcripts; once received review and proceed accordingly. DPH</p>                                                                                                                                                                                                                                                                                                                                                                                       |
| 01-22-18 | <p>S/A Blake traveled to Charlotte and met with Hal Sumpter Sr. and obtained the stored records for transactions involving the Combis family.</p> <p>Of note was approx. \$50000 in loans to Diane Combis during June 2014 to November 2015. The loans were made using watches, necklaces, bracelets and earrings as collateral. The loans were repaid and the collateral retained by Diane.</p> <p>There were also numerous service records for individual Rolex watches.</p> |
| 02-06-18 | <p>S/A Bake received the Court transcript for the 11-17-17 hearing, from Shirley Brooms.</p>                                                                                                                                                                                                                                                                                                                                                                                   |
| 2/22/18  | <p>Case Review: Still awaiting two outstanding transcripts before proceeding. Proceed accordingly. DPH</p>                                                                                                                                                                                                                                                                                                                                                                     |
| 03-01-18 | <p>1000 – S/A Blake sent emails to Herron and Watkins requesting status updates for the transcripts.</p>                                                                                                                                                                                                                                                                                                                                                                       |



## CASE MANAGEMENT HISTORY

AGENT: Kevin Blake  
 Lt. Derrick Horton

SUPERVISOR: Lancaster

COUNTY:

CASE NUMBER: 32-17-0135

VICTIM: Estate of Combis, Chris  
 "Pops"  
 Requestor Judge Gibbons,  
 Brian

SUBJECT: Combis, George  
 Combis, Diane  
 Combis, Chris A.

|          |                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03-13-18 | 1942 – S/A Blake received an email from Herron in which she indicated she had not received payment for the invoice she submitted. She was also in receipt of a request from the Defense for a copy of the transcript.<br><br>S/A Blake sent an email to A. Whitsett to get a status update on the payment.                                                                                               |
| 03-19-18 | 1539 – S/A Blake received an email from Watkins in which he indicated he forgot about the request and only found it when he was cleaning out old emails. He had not started on the transcript. S/A Blake sent a reply and requested an estimate on when the transcript would be available.                                                                                                               |
| 03-22-18 | 1034 – S/A Blake received an email from A. Whitsett which indicated payment was sent to Herron on 01-19-18 in the amount of \$414.25. The information was forwarded to Herron.                                                                                                                                                                                                                           |
| 03-25-18 | S/A Blake communicated with A. Whitsett and SLED Finance Dept. and concluded payment was made and contact would be made with Herron to verify.                                                                                                                                                                                                                                                           |
| 03-27-18 | 1500 – S/A Blake received an email from Herron in which she indicated she received payment. She requested future payments be accompanied by an email or letter that payment had been made. An additional invoice was attached which indicated she had underestimated the initial length of the transcript, and an additional \$84.50 was due.<br><br>The email was forwarded to A. Whitsett and Finance. |
| 4/3/18   | CR: Waiting on court transcript production. Update accordingly. DPH                                                                                                                                                                                                                                                                                                                                      |
| 04-25-18 | 0840 – S/A Blake received an email from A. Whitsett which indicated payment had been sent to Herron on 04-20-18. Herron had requested the payments be sent by check, but her SCEIS account will only allow electronic transfers.<br><br>0945 – S/A Blake sent Herron and email with the payment information.                                                                                             |
| 04-26-18 | 0749 – S/A Blake received an email from Herron which indicated she had received the payment and mailed the transcript on 04-25-18.<br><br>S/A Blake reviewed the transcript sent by Watkins.                                                                                                                                                                                                             |
| 04-27-18 | 0930 – S/A Blake contacted Corbett and advised the final transcript had been sent.                                                                                                                                                                                                                                                                                                                       |

Form #RO-030

Page 4 of 5

ROA 0950



## CASE MANAGEMENT HISTORY

|             |                                   |              |                                                                                      |
|-------------|-----------------------------------|--------------|--------------------------------------------------------------------------------------|
| AGENT:      | Kevin Blake<br>Lt. Derrick Horton | CASE NUMBER: | 32-17-0135<br>Estate of Combis, Chris<br>"Pops"<br>Requestor Judge Gibbons,<br>Brian |
| SUPERVISOR: | Lancaster                         | VICTIM:      | Combis, George<br>Combis, Diane<br>Combis, Chris A.                                  |
| COUNTY:     |                                   | SUBJECT:     |                                                                                      |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5/1/18   | CR: Awaiting one additional transcript to review; proceed accordingly. DPH                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 05-22-18 | All transcripts have been reviewed. Meeting will be set after Bike Week to discuss the case with Judge Gibbons.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 06-06-18 | 1345 – S/A Blake spoke with Corbett and scheduled a phone conference with Judge Gibbons for Monday 06-18-18 at 1000.                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 06-18-18 | 1000 – S/A Blake and SLED Legal Counsel, Adam Whitsett, spoke with Judge Gibbons. Judge Gibbons was advised that all of the available court transcripts had been reviewed, and that there was not enough information to proceed with a perjury case due to the lack of cooperation on behalf of the Combis family members. There was however enough for him to find the Combis family members in criminal contempt, and possibly "obstruction of administrative justice." Judge Gibbons advised he was going to recuse himself from the case and assign another Judge. |
| 7/10/18  | CR: Conclude meetings with attorneys as planned and close case if no further assistance needed. DPH                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 07-20-18 | Conducting meetings outside of court with the attorneys was not possible.<br><br>This case is closed with no further follow-up investigation requested by Judge Gibbons.                                                                                                                                                                                                                                                                                                                                                                                               |
|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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STATE OF SOUTH CAROLINA )

COUNTY OF LANCASTER )

IN THE MATTER OF ESTATE )  
OF CHRIS COMBIS, )Desa Ballard, as Personal Representative )  
of the Estate of Chris Combis, )

Petitioner, )

vs. )

George Combis, Chris A. Combis, )  
Diane Combis, )Respondents. )  
\_\_\_\_\_ )IN THE COURT OF COMMON PLEAS  
Case No.: 2014-CP-29-00306**ATTORNEY FEE AFFIDAVIT  
OF NEAL D. TRUSLOW ON  
BEHALF OF DOUGLAS N.  
TRUSLOW AS PARTNER**

PERSONALLY APPEARED BEFORE ME, Neal D. Truslow, who being duly sworn deposes and says:

1. I am a partner in the law firm of Truslow & Truslow along with my father and partner Douglas N. Truslow who is attorney for Petitioner Ballard herein. Douglas Truslow is currently out of the country; I am issuing this Affidavit as his law partner and law firm representative and based upon regularly-maintained business records at our law firm. This Affidavit can be supplemented upon his return if the Court should so require.
2. I have been practicing law since 2009 both civilly with a general litigation firm with a well-established reputation, and as a JAG officer in the South Carolina Army National Guard. I am in good standing in the State of South Carolina, as well as the United States District Court for the District of South Carolina, the United States

Court of Appeals for the Fourth Circuit, the United States Court of Appeals for the Armed Forces, and the United States Supreme Court.

3. I have reviewed the attached fee statement of my father and our paralegal as it relates only to the Motion to Compel/Rule to Show Cause in the within matter and have consulted with Douglas N. Truslow about same. I hereby affirm that what has been captured by our billing and time keeping program appears accurate to the best of my knowledge.
4. My father's fees and costs<sup>1</sup> are based on, *inter alia*, the following:
  - a. Douglas N. Truslow has continuously been practicing law since 1975. His law practice is a trial practice and general litigation firm. He has considerable experience addressing the issues herein. He is an AV rated lawyer and is in good standing in the State of South Carolina, as well as the United States District Court for the District of South Carolina, and the United States Court of Appeals for the Fourth Circuit.
  - b. The nature, extent, and difficulty of this case are those brought of a lengthy and contentious dispute within one family originating in Probate Court which further spawned actions in the court of Common Pleas, the United States District Court, and the 4<sup>th</sup> Circuit Court of Appeals as well as crossing state lines resulting in multiple actions in North Carolina. The time set forth in the attached represents only a fraction of the time spent in this matter, and is solely related to the Rule to Show Cause.

---

<sup>1</sup> Itemized Statement Attached as Exhibit 1.

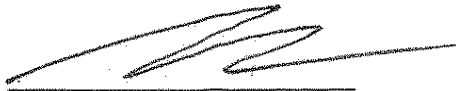
- c. Douglas N. Truslow was retained as counsel for Petitioner in the middle of 2017 to represent her as it related to contested matters within the existing case as she was Personal Representative and was cautious of potential conflicts if she were to proceed *pro se*.
- d. Per the Court's request, the time reflected herein relates to a Motion to Compel items that were lawfully subpoenaed from George Combis, Diane Combis, and Chris A. Combis in early 2017 and their failure to produce same. Further, after Defendants were forced to make production, it was determined that what was produced was not what was subpoenaed, and it was determined that a Rule to Show Cause was in order and filed on August 24, 2017. As a result of Defendants' and their counsel(s)'s non-compliance and general contentious and reluctant attitude toward these proceedings, more time than should have been needed has unfortunately been expended.
- e. As has been the case from the very beginning of this matter in 2013, Ms. Ballard has been met with brick walls, lies, failure to comply, false promises, law suits, failure to appear for depositions, and a generally obfuscating, obstructionist, and contentious atmosphere all the while trying to do her job and act as Personal Representative to the Estate. All of the above along with a revolving door of counsel for the Combises have caused this matter to needlessly stretch over the years causing the Estate undeniable damage.
- f. Douglas N. Truslow is employed on an hourly basis.

- g. Douglas N. Truslow has kept track of the time expended (in 1/10 hour increments) at his traditional rate of \$425.00 per hour. His paralegal is charged for at the rate of \$100.00 per hour.
- h. In order to minimize fees for the Estate, Ms. Ballard and her staff prepared many of the documents which Mr. Truslow finalized for filing and service in this matter. As a result, the time entries set forth here are much lower than they would ordinarily have been.
- i. Our firm has expended 149.80 hours on this Rule to Show Cause matter to date. The majority of his time was spent corresponding with opposing counsel, multiple attempts get the subpoenaed items from the opposing side, researching the relevant issues, reviewing, filing and serving the pleadings, multiple conferences with the client, as well as pleading preparation, and travel to/from Lancaster from Columbia.

|             |             |
|-------------|-------------|
| Fees owed:  | \$51,705.00 |
| Costs owed: | \$388.80    |
| Total owed: | \$52,093.80 |

[SIGNATURE ON FOLLOWING PAGE]

Truslow & Truslow Law Firm

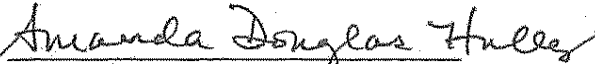


NEAL D. TRUSLOW  
DOUGLAS N. TRUSLOW  
Attorneys for Defendant  
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Columbia, SC 29202  
(803) 256-6276  
Fax (803) 256-7659  
[nealtruslow@truslowlaw.com](mailto:nealtruslow@truslowlaw.com)  
[douglastruslow@truslowlaw.com](mailto:douglastruslow@truslowlaw.com)

Columbia, South Carolina  
10/17, 2019

SWORN TO AND SUBSCRIBED BEFORE ME

this 17 day of October, 2019



Notary Public for South Carolina

My Commission Expires: Nov. 22, 2020

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF LANCASTER )

IN THE COURT OF COMMON PLEAS  
 Case No. 2014-CP-29-00306

IN THE MATTER OF ESTATE )  
 OF CHRIS COMBIS, )  
 )

Desa Ballard, as Personal Representative )  
 of the Estate of Chris Combis, )  
 )

Petitioner, )  
 )

vs. )  
 )

George Combis, Chris A. Combis, )  
 Diane Combis, )  
 )

Respondents. )  
 )  
 \_\_\_\_\_ )

**AFFIDAVIT OF DESA  
 BALLARD REGARDING  
 PERSONAL  
 REPRESENTATIVE FEES**

Personally appeared before me, Desa Ballard, who being duly sworn, deposes and says that:

1. I am over the age of eighteen years and am competent to state the matters set forth herein. I have personal knowledge of the matters stated, except for those matters stated on information and belief, and as to those I have a good faith basis for believing them to be true.
2. I received a telephone call from Charles Bridgmon on March 8, 2013, in which he advised he and his opposing counsel wished me to serve as a personal representative for an estate matter that was in Lancaster. I asked him to get his opposing counsel on the phone so we could talk and he did.
3. After speaking with Mr. Bridgmon (counsel for George Combis and Diane Combis) and Pete Nosal (Counsel for Linda Combis and Mary Combis), I checked conflicts



and advised via email on March 8, 2013 at 4:44 pm that I could serve as personal representative.

4. Mr. Bridgmon represented George and Diane Combis. Mr. Nosal represented Linda Combi and Mary Combis. All interested parties filed nominations with the Lancaster County Probate Court nominating me to serve as personal representative of the Estate of Chris Combis, and I was appointed by the probate court on May 2, 2013.
5. Through Mr. Bridgmon and Mr. Nosal, the parties and I agreed on April 4, 2013 that I would be compensated for my time as personal representative at the rate of \$400.00 per hour and for the services of my forensic accountant at \$150.00 per hour, with each side paying one-half of my fees. Each side sent me a check for \$2,500.00 for a total retainer of \$5,000.00.
6. On July 31, 2013, I updated counsel on the status of my investigation to date and requested additional funds. I have not been paid any additional fee for services as personal representative.
7. The attached time sheets represent the time I have spent in my capacity as personal representative as it relates to the failure of George, Diane and Chris Combis to comply with subpoena served on them in early 2017.
8. Because I am serving as personal representative, which is a representative capacity, I did not feel that I could safely appear *pro se* in this matter, and it was necessary for me to retain counsel to represent me in the contested matters, of which the Rule to Show Cause was one.
9. The total fees due to me as personal representative for matters arising out of the failure of the Respondents to respond to the subpoenas, and the Rule to Show Cause

which followed, are itemized on the attached time sheets, which are kept contemporaneously in our computerized time/billing system. This is the same system I use for hourly billing for representation of clients.

10. There is significant other time expended by me and my staff for my services as personal representative, but the attached represent only those hours devoted to the failure of the respondents to respond to the subpoenas for items of personal property and the following proceedings.
11. I have personally reviewed the time sheets attached hereto and affirm to the best of my knowledge and memory that these time sheets are correct and accurate, with one exception. On many occasions, as these proceedings dragged on, I did not record all time expended in working as personal representative. The time sheets reflect only that time that was captured in the billing system. Much work done at nights, on weekends, and on extremely busy days was not recorded.
12. Further, deponent sayeth not.



Desa Ballard

Sworn to before me this

15 day of October, 2019



Notary public for South Carolina

My commission expires: 11-2-2027

STATE OF SOUTH CAROLINA

COUNTY OF LANCASTER

IN THE MATTER OF THE ESTATE OF  
CHRIS COMBIS

DESA BALLARD, as Personal Representative  
of the Estate of Chris Combis,

Plaintiff,

vs.

GEORGE COMBIS, DIANE COMBIS, and  
CHRIS COMBIS,

Defendants.

IN THE COURT OF COMMON PLEAS

Case No. 2014-CP-29-306

**JOINT NOTICE OF APPEAL OF  
GEORGE AND CHRIS COMBIS**

NOW COMES Defendant George Combis and Chris Combis by and through their respective undersigned counsel of record and pursuant to Rule 203 of the South Carolina Rules of Appellate Procedure, hereby appealing the order of the Honorable Brian Gibbons dated December 31, 2019, filed December 31, 2019 (denying reconsideration), and the order dated October 21, 2019, filed October 21, 2019 (granting motion for contempt). Appellant received written notice of entry of the Order Granting Motion for Contempt order on October 21, 2019, and received written notice of entry of the Motion to Reconsider order on December 31, 2019. Copies of both orders are attached hereto.

THIS the 31<sup>st</sup> day of December, 2019.

REDDING JONES, PLLC

By: /s/Ty K. McTier  
Ty K. McTier  
2907 Providence Road, Suite 303  
Charlotte, North Carolina 28211

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Lancaster Common Pleas

**Case Caption:** Desa per Rep; Ballard , plaintiff, et al VS George Combis ,  
defendant, et al  
**Case Number:** 2014CP2900306  
**Type:** Notice/Other

So Ordered

s/Brian M. Gibbons #2168 Circuit Judge

Electronically signed on 2019-12-31 09:56:26 page 5 of 5

ELECTRONICALLY FILED - 2019 Dec 31 10:00 AM - LANCASTER - COMMON PLEAS - CASE#2014CP2900306

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
APPELLATE CASE NO. 2020-000021

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APPEAL FROM LANCASTER COUNTY  
BRIAN M. GIBBONS  
Trial Court Case No. 2014-CP-29-00306

---

In the Matter of the Estate of Chris Combis,  
Desa Ballard, as Personal Representative of the Estate of Chris Combis,

Respondent,

v.

George Combis, Diane Combis, and Chris Combis,

Defendants,

Of whom

George Combis and Chris Combis are,

Appellants.

---

**MOTION TO LIFT STAY  
OR TO EXPEDITE APPEAL**

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Pursuant to Rule 241(c)(1) SCACR, Respondent Ballard hereby moves this Honorable Court to lift the stay granted in this matter by the trial judge. In the alternative, because of the unusual circumstances of this case, Ballard seeks to expedite the appeal with an abbreviated and accelerated briefing schedule as in Decker v. Smith, 322 S.C. 212, 471

S.E.2d 459 (1995)<sup>1</sup>. Alternatively, Ballard asks the Court to expeditiously decide the appeal on the merits based on the record presented, as in Green v. Lewis Truck Lines Inc., 314 S.C. 303, 443 S.E.2d 906 (1994).

In support of her motion, Ballard would show:

1. Ballard serves as personal representative of the Estate of Chris Combis, having been appointed by unanimous nomination of the heirs of the estate and appointed by order of the Probate Court on May 2, 2013.
2. Ballard's investigation into assets of the estate identified items of personal property which could not be located. Ballard requested certain individuals, including Appellants George Combis<sup>2</sup> (hereafter "George") and his adult son Chris Combis (hereafter "Chris"), to deliver to her items which belonged to the decedent at the time of his death. The requested items were acknowledged to be in the possession of Appellant George Combis by his then-counsel. (**Exhibit A**).
3. When the items were not produced, Ballard served subpoenas for production of the items on appellants. (**Exhibits B and C**). When no items were produced, Ballard moved to compel, and Circuit Judge Brian M. Gibbons<sup>3</sup> issued an order compelling production of

---

<sup>1</sup> In Decker, the Supreme Court ordered the Record on Appeal and Appellant's brief to be filed within seven (7) days of its order, Respondent's brief seven (7) days later, and any reply brief three (3) days after that. Decker, 471 S.E.2d at 461.

<sup>2</sup> Decedent had three (3) adult children: George Combis, Linda Combis and Mary Combis. George is married to Diane Combis, and Chris is their adult son. Neither Linda nor Mary are married and neither have children.

<sup>3</sup> The matter was transferred to the Circuit Court by Lancaster County Probate Court order.

the items requested. (**Exhibit D**). Essentially, items involved included a coin collection, firearms and at least one expensive Rolex watch.

4. After numerous excuses for non-production, a box of items of personal property was delivered to Ballard's office. Items produced included limited rolls of coins, one cheap pistol (Appellants' counsel admitted there were more, more than once) and a fake Rolex watch. Photographs of some of the items are attached. (**Exhibits E**). It became apparent to Ballard that the items produced were not the items which had belonged to the decedent, and that Chris and George, and perhaps their counsel, were not in compliance with the Court's order.
5. Ballard filed a Petition and sought a Rule to Show Cause against George, Chris and Diane, asking the Court to inquire into the failure of the responding parties to comply with the order to compel<sup>4</sup>.
6. Following a day and a half of testimony, Judge Gibbons halted the proceedings and ordered a criminal investigation be conducted by SLED related to these missing items of personal property. (**Exhibit F**)<sup>5</sup>.

---

<sup>4</sup> Both George and Chris were personally served with the Rule to Show Cause, in that the contempt complained of occurred outside the presence of the Court. Bakala v. Bakala, 352 S.E.2d 612, 576 S.E.2d 156 (2003); State v. Johnson, 249 S.C. 1, 152 S.E.2d 669 (1967). Judge Gibbon's order is based both upon conduct which occurred outside the presence of the court, as well as his observation of the witnesses and testimony which was submitted in Court. (October order, **Exhibit G**).

<sup>5</sup> Ballard continued litigating other issues relevant to the Estate, including the collection by the Estate of a \$230,000.00 promissory note owed to the decedent's estate by Superior Tile, Terrazzo and Marble Corporation, a Charlotte corporation. Superior Tile had been started by the decedent in 1957 but was determined to be owned by George at the time of decedent's death. Ballard could find no clear evidence that the decedent's 51% interest in the company had been transferred by decedent prior to his death, and originally claimed the stock as an asset of the estate. Subsequent litigation in North Carolina determined that George owned the entire company. The United States District Court for

7. While no criminal charges were initiated following the SLED investigation (the items were maintained in North Carolina), Judge Gibbons reconvened the hearing and issued an order in October, 2019, holding George and Chris in contempt of court and awarding compensatory contempt in the amount of \$70,000.00 be paid by George and Chris to the estate<sup>6</sup>. (**Exhibit H**).
8. Judge Gibbons noted that, during the contempt proceedings, a real Rolex and a second gun were produced under odd circumstances in the courtroom at the insistence of counsel for George and Chris. Although no cognizable explanation had been offered for the failure to produce the items earlier. (Order ¶ 10).
9. Specifically, Judge Gibbons found that “it was the intent of Chris . . . to mislead Ballard and the Court.” *Id.* ¶ 11. He found that the decedent’s gold Rolex had been remodeled and given by Chris to his then-wife, who had testified and identified the gold Rolex. *Id.* ¶ 18. In juxtaposition to the production of the fake Rolex watch, Judge Gibbons found Chris’ denials and explanation of the history of the watch “not credible” and “disingenuous at best.” *Id.* ¶17. He also found that Chris’ testimony that he did not recognize a real Rolex from a fake one “lacks credibility.” *Id.* ¶ 23. Chris’s contempt was “intentionally and deliberately in willful noncompliance with the Court’s Order.” *Id.*
10. Judge Gibbons noted (although George did not testify) the record reflected earlier testimony from George and “his demeanor during these proceedings. . . which clearly

---

the District of South Carolina recently ruled that Superior Tile owed the promissory note and recently entered judgment in favor of the estate against Superior Tile for principal and interest due on the promissory note. [USDC Case Number 0:14-cv-01839-JFA ECF Document Number 304)].

<sup>6</sup> Judge Gibbons ruled there was insufficient evidence from which to conclude that Diane had intentionally violated the Court’s order and did not find her to be in contempt of court. No appeal has been taken from that finding.

demonstrate his contempt for these proceedings and for Ballard.” *Id.* ¶ 12 (emphasis added).

11. Judge Gibbons further found that “[i]t is clear from the long and convoluted record . . . that [George] has thwarted every reasonable effort taken by Ballard to complete a full accounting . . . for [the] estate. George’s lack of respect for this Court is concerning his conduct has made it clear that he intends to obstruct these proceedings in every way he can.” *Id.* ¶ 29 (emphasis added).

12. Judge Gibbons’ findings regarding George’s attitude during these proceedings was echoed by that of United States District Court Judge Joseph F. Anderson<sup>7</sup> in other proceedings that George had been “less than forthcoming” and “internally inconsistent<sup>8</sup>” in that proceeding. Ballard v. Combis, Civil Action No. 0:14-cv-01839, p. 5-6. Judge Anderson also referenced deposition testimony from George which said “. . . not being smart, I don’t have to show anybody where it came from.” *Id.* p. 6<sup>9</sup><sup>10</sup>.

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<sup>7</sup> Judge Anderson’s order is referenced to establish that George’s contemptuous conduct was not limited to the instant proceedings and has characterized George’s obstructive behavior throughout Ballard’s service as personal representative and successor trustee.

<sup>8</sup> Judge Anderson noted that George had testified he spent large sums of money for the benefit of his sister, Linda, but “[b]y the next morning of trial, however, George had retreated from this position and acknowledged on cross-examination that none of these items were purchased with the Trust monies, if that they had been purchased at all.” *Id.* p. 6.

<sup>9</sup> When answering questions about the source of funds in a joint investment account which was later transferred by Pop into the trust and then subsequently “loaned” from the trust to her husband George by Diane, who was the trustee at the time. Judge Anderson found this Loan to be a breach of fiduciary duty and awarded the trust the amount of the loan \$412,000 plus interest for a total at that time of \$711,619.94.

<sup>10</sup> At the request of the parties, Ballard also became successor trustee of the decedent’s trust. The trust had minimal funds (which Diane refused to release to

13. Judge Anderson also noted that prior counsel for George and Diane, Charles Bridgmon, had “assisted Diane and George in furthering George’s plans to purchase” an estate/trust asset (house) by appearing at the foreclosure hearing and consenting to foreclosure<sup>11</sup>. *Id.* ¶ 57.
14. Judge Gibbons found that Ballard had established her burden of proof by clear and convincing evidence. (Order p. 20). “. . . Respondents George and Chris A. have intentionally and knowingly violated” the Court’s order requiring them to produce assets to Ballard. “Most egregiously, these Respondents have shown a complete disregard for the authority of this Court and its order” and characterized their conduct as “intentional obstruction of Ballard’s reasonable efforts as personal representative.” (Order. P. 20). Furthermore, he noted “Ballard and her attorney, Mr. Truslow, have done everything in

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Ballard), but held title to a home in Lancaster that Linda lived in, and in which Mary was then residing, after George and Diane sold the house she had lived in, which was also owned by the trust. Ballard discovered foreclosure proceedings on the Lancaster property and sold Mary’s unencumbered house (which was being leased to a tenant) to reinstate the mortgage. George admitted in deposition testimony that he had planned to purchase the Lancaster house at foreclosure sale and would work something out with his sisters so they would have a place to live. This, of course, followed his sale of Mary’s house and his earlier efforts to evict Linda from the house she occupied, both of which houses were owned by the trust. Ballard pursued a civil action for \$412,000.00 that George and Diane had removed from the trust and applied to their personal line of credit secured by their home. Judge Anderson entered judgment against George and Diane for the theft of the funds, but the Fourth Circuit Court of Appeals reversed the judgment as to George. The Court of Appeals noted, in footnote 3, that counsel for George and Diane had a conflict of interest, which became clear when counsel succeeded in vacating the judgment as to George, leaving Diane as the only judgment debtor. Ballard v Combis No. 16-2057, ECF 61 (4<sup>th</sup> Cir, January 8, 2019)

<sup>11</sup> Judge Anderson also found that George and Diane’s counsel had failed to disclose to Ballard the existence of the foreclosure proceeding when she agreed to become successor trustee of the trust. *Id.* ¶ 58. The counsel also “failed to respond to her inquiry as to the status of the foreclosure.” *Id.* ¶ 59.

their power in attempting to recover or fully account for property . . . of the [e]state. Their reasonable efforts have been rebuffed at almost turn. . .” (Order p. 21).

15. Judge Gibbons awarded sanctions via a contempt jail sentence that could be purged if his award of compensatory contempt<sup>12</sup> was paid prior to December 31, 2019. (Order pp. 20-21). Judge Gibbons specifically found that the order of contempt was “conditional” and “civil” in nature “because the party being sanctioned for contempt could end the sentence and discharge himself at any moment . . .” *Id.*
16. On rehearing, Judge Gibbons confirmed his award, clarified it to make clearer still the civil nature of the contempt order imposed, and noted that “[t]he arguments set forth by George and Chris merely confirms this Court’s conclusion . . . that both ‘knew they had additional items that were the subject of this Court. . . order and deliberately withheld the items from Ballard in violation of the Court’s order.’”. (Order dated Dec. 31, 2019, p. 1).
17. Upon separate motion by counsel for George and Chris on January 3, 2020, Judge Gibbons granted a stay pending appeal, (Order dated January 3, 2020, **Exhibit I and J**).

### **Discussion**

Ballard moves, pursuant to Rule 225(c)(1) for an order of the Court of Appeals lifting the stay pending appeal. It is respectfully submitted that the stay pending appeal issued by Judge Gibbons will defeat the purpose of the contempt order, making the appeal moot. *See Jennings v. Jennings*, 104 S.C. 242, 88 S.E. 527 (1916), citing *Klink v. Black*, 14 S.C. 241 (1880). Further, a stay while an appeal wends its way through the Courts prevented Ballard from concluding the probate of the estate.

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<sup>12</sup> As explained in his order, Judge Gibbons calculated the amount of compensatory contempt based on the amount of time Ballard and her counsel had necessarily devoted to seeking compliance with the Court’s earlier order.

By its very nature, an order of civil contempt is “to coerce that individual to do the thing required by the order for the benefit of the complainant.” Posner v. Posner, 383 S.C. 26, 577 S.E.2d 616, 619 (Ct.App. 2009), citing Miller v. Miller, 375 S.C. 443, 456, 652 S.E.2d 754, 761 (Ct.App. 2007). Judge Gibbons has found overwhelming evidence of George and Chris’ deliberate attempts to mislead the Court and to engage in obstructionist behavior. As noted above, Judge Gibbons found noted “Ballard and her attorney, Mr. Truslow, have done everything in their power in attempting to recover or fully account for property . . . of the [e]state. Their reasonable efforts have been rebuffed at almost turn. . .” (October Order p. 21).

Judge Gibbons expressly calculated the amount of sanctions assessed against George and Chris based on the conduct of George and Chris during this litigation “which was unnecessarily prolonged by the conduct of George and Chris. . .” (October Order p. 21). “The estate needs to be made whole.” *Id.* In his order on rehearing, Judge Gibbons stressed that the sanctions were awarded as “compensatory contempt” and were “calculated on the basis of the amount of time spent by both Ms. Ballard and Mr. Truslow, [but] the award is a sanction.” (December Order p. 2).

By granting a stay pending appeal, especially after the appeal had been filed, Judge Gibbons has essentially vacated and/or made meaningless the sanctions award. The sanctionable conduct has already occurred. The estate has already been damaged<sup>13</sup>. The compensatory contempt is a small sum when compared to the years of litigation and delays

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<sup>13</sup> As is evident from the order appointing Ballard as personal representative in the spring of 2013, there have been multiple delays in concluding this proceeding, with the litigation entering its seventh year in mere months.

caused by George and Chris (and Diane) and in light of their severe abuse of the judicial system.

Because the order of contempt was civil in nature, Judge Gibbons need not have required any mechanism by which the contempt could be purged, but he elected to do so as an accommodation to George and Chris. Cannon v. Georgia Attorney General's Office, 397 S.C. 541, 726 Ss.E.2d 698 (2012). "The award of attorney's fees is not a punishment but an indemnification to the party who instituted the contempt proceedings. . . Thus, the court is not required to provide the contemnor with an opportunity to purge himself of these attorney's fees in order to hold him in civil contempt." *Id.* 725 S.E.2d at 702.

An order of civil contempt is not automatically stayed by appeal. Brunson v. Brunson, 91 S.C. 411, 74 S.E.2d 928 (1912). Granting the stay requested by George and Chris has effectively vacated the order of contempt<sup>14</sup>; however, as a matter of accommodation, Judge Gibbons provided George and Chris with a means to purge the contempt, yet they chose not to do so.

It is respectfully submitted that the grant of a stay by the trial court was not appropriate, in that the court had already provided George and Chris with a means to purge their civil contempt, but they chose not to do so. Ballard prays for an order vacating the stay pending appeal.

In the event this Court deems a lifting of the stay to be unwarranted, because of the egregious nature of the conduct of George and Chris, Ballard urges this Court to issue an expedited briefing schedule, *ala* Decker, so that this appeal may be decided in an

---

<sup>14</sup> See State v. Passmore, 363 S.C. 568, 611 S.E.2d 273 (Ct.App. 2005) (finding appellant's case moot after service of sentence for criminal contempt).

accelerated fashion. Alternatively, Ballard will submit the entire record on appeal of these contempt proceedings for the Court to decide the appeal on the merits, should the Court determine that would be an appropriate means of addressing this unusual and distasteful matter.

### Conclusion

For the reasons set forth above, Ballard moves this Court for an order lifting the stay granted by Judge Gibbons, leaving to George and Chris to determine whether they will purge themselves of civil contempt using the option provided to them by the trial court by paying the contempt sanction to the Estate.

Alternatively, Ballard submits that this matter is appropriate for an expedited appeal *ala Decker*, or a decision on the merits as part of the Court's consideration of this motion.

All of which is respectfully submitted,

Truslow & Truslow Law Firm



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NEAL D. TRUSLOW

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[douglastruslow@truslowlaw.com](mailto:douglastruslow@truslowlaw.com)

January 16, 2020

**EXHIBIT A**

**Mara Ballard**

---

**From:** Charlie Bridgmon <cjblaw@carolina.rr.com>  
**Sent:** Thursday, October 17, 2013 11:41 AM  
**To:** Mara Ballard  
**Cc:** Desa Ballard; Charlie Bridgmon  
**Subject:** Re: Combis: CD information  
**Attachments:** image001.jpg

Yes, and thanks for reminding me.

The Rolex was given to Chris, Jr. (George's son) during Pop's lifetime.

There are no rifles that George is aware of, only a couple of pistols. He has those.

Pop gave the Silver Dollars to Diane as a thank you before he passed. That said, she is not going to let them interfere with trying to get this case resolved.

Charles J. Bridgmon\*  
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5970 Fairview Rd., Suite 700  
Charlotte, NC 28210  
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Cell: (803) 331-6013  
Fax: (704) 552-5271  
Email: [cjblaw@carolina.rr.com](mailto:cjblaw@carolina.rr.com)

\* Admitted in NC & SC

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**From:** Mara Ballard <[Mara@desaballard.com](mailto:Mara@desaballard.com)>  
**Date:** Thursday, October 17, 2013 11:32 AM  
**To:** Charlie Bridgmon <[cjblaw@carolina.rr.com](mailto:cjblaw@carolina.rr.com)>  
**Cc:** Desa Ballard <[desab@desaballard.com](mailto:desab@desaballard.com)>, Mara Ballard <[Mara@desaballard.com](mailto:Mara@desaballard.com)>  
**Subject:** RE: Combis: CD information

Sometime last week, Desa sent you an email about a Rolex, rifle and maybe some silver coins (trying to recall off the top of my head). Do you have that email and have you asked George about those items?

Mara T. Ballard, CMA, CFE  
Forensic Accountant (not a lawyer)  
Ballard Watson Weissenstein  
226 State Street (29169)  
Post Office Box 6338  
West Columbia, South Carolina 29171  
803.796.9299  
803.796.1066 Facsimile  
[www.desaballard.com](http://www.desaballard.com)



---

**From:** Charlie Bridgmon [mailto:[cjblaw@carolina.rr.com](mailto:cjblaw@carolina.rr.com)]

**Sent:** Thursday, October 17, 2013 11:07 AM

**To:** Mara Ballard

**Cc:** Desa Ballard; Charlie Bridgmon

**Subject:** Re: Combis: CD information

Mara:

It's document number 00398 in the materials. I don't have any documentation other than the deposit receipt, so I've asked Diane to call her contact at the bank to see if they can give her a quick report on balance as of Feb. 3, 2009.

Thanks,

Charlie

Charles J. Bridgmon\*

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Charlotte, NC 28210

Phone: (704) 552-5270, ext. 702

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**From:** Mara Ballard <[Mara@desaballard.com](mailto:Mara@desaballard.com)>

**Date:** Wednesday, October 16, 2013 5:58 PM

**To:** Charlie Bridgmon <[cjblaw@carolina.rr.com](mailto:cjblaw@carolina.rr.com)>

**Cc:** Desa Ballard <[desab@desaballard.com](mailto:desab@desaballard.com)>, Mara Ballard <[Mara@desaballard.com](mailto:Mara@desaballard.com)>

**Subject:** Combis: CD information

ON the attached with I believe was done by Diane there is listed a First Citizens CD 5789 with a balance of \$4,887.00. I don't see that I have any documentation on that account and I've been through the 900+ page file several times. Can you look and see if you have anything? I'm looking particularly for a value of that account at 2/9/2009. Anything remotely close to that date would do as well, but I'd like it to be a bank document.

Thank you.

Mara

**Mara Ballard**

---

**From:** Charles Bridgmon <CBridgmon@braylong.com>  
**Sent:** Friday, November 15, 2013 4:23 PM  
**To:** Desa Ballard  
**Cc:** Mara Ballard; douglastruslow@truslowlaw.com; Terrie Stafford; Charles Bridgmon  
**Subject:** Re: Trust funds

Thanks, Desa. I will see what I can do on the check. (It's locked up very securely on my end.) It will be Monday before I can talk to them, but it may be that I can hand-deliver it to you on Thursday.

Same for the guns. They are in a safe, but they are out of town until Monday.

On a somewhat aside, what is Lochridge on the market for? I may know someone interested in it as a rental property as well.

Have a good weekend.

Charlie

Charles J. Bridgmon\*  
Bray & Long, PLLC  
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Charlotte, NC 28209  
Phone: (704) 523-7777, ext. 31  
Cell: (803) 331-6013  
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**From:** Desa Ballard <[desab@desaballard.com](mailto:desab@desaballard.com)>  
**Date:** Friday, November 15, 2013 4:20 PM  
**To:** Charlie Bridgmon <[cbridgmon@braylong.com](mailto:cbridgmon@braylong.com)>  
**Cc:** "Mara@desaballard.com" <[Mara@desaballard.com](mailto:Mara@desaballard.com)>, "[douglastruslow@truslowlaw.com](mailto:douglastruslow@truslowlaw.com)" <[douglastruslow@truslowlaw.com](mailto:douglastruslow@truslowlaw.com)>, Terrie Stafford <[Terrie@desaballard.com](mailto:Terrie@desaballard.com)>  
**Subject:** Trust funds

Charlie, we have received the November rent from Mr. Springstead. Concerns about the security of funds in my hands is a non-issue. Any other lawyer in the state, maybe not. But me – I'm a sure thing.

I would again ask that you release the balance of the trust funds (the check you photocopied and sent to Doug).

By the way, I have obtained a copy of the insurance policy on Lochridge so you can stop looking for that.

I do still need the make, model and serial number on the firearms.

Have a good weekend. I'll look for that check in the Monday mail.

db

db

Desa Ballard

Ballard Watson Weissenstein

Telephone 803.796.9299

Facsimile 803.796.1066

E-mail: [desab@desaballard.com](mailto:desab@desaballard.com), copy to [terrie@desaballard.com](mailto:terrie@desaballard.com)

STATE OF SOUTH CAROLINA

IN THE PROBATE COURT

COUNTY OF: LANCASTER

INVENTORY AND APPRAISEMENT: PROBATE PROPERTY

☐ ORIGINAL

☒ SUPPLEMENTARY, AMENDED OR CORRECTED #2

(must restate the unchanged information from the original Inventory)

IN THE MATTER OF:

Chris Combis

(Decedent)

CASE NUMBER: 2012-ES-29-00415

File the original Inventory and Appraisal with the Probate Court within ninety (90) days following the fiduciary appointment. A copy shall be sent to each interested person who has demanded it. A Proof of Delivery must be filed with the Court. The gross fair market value of all probate assets, regardless of location (whether in this state or elsewhere), should be listed as of the date of death. Continue on additional sheets if necessary. A Supplementary, Amended, or Corrected Inventory should be utilized for correcting, adjusting or adding to an original inventory, and must restate the unchanged information from the original Inventory. A qualified and disinterested appraiser may be employed to ascertain the value of any asset. If an appraiser is employed, his/her name and address must be indicated with the item or items he/she appraised.

### RECAPITULATION

|                                                                            |                     |
|----------------------------------------------------------------------------|---------------------|
| Schedule A - Real Estate.....                                              | \$0.00              |
| Schedule B - Stocks and Bonds .....                                        | \$0.00              |
| Schedule C - Notes Due Decedent and Cash.....                              | 494,129.66          |
| Schedule D - Insurance on Decedent's Life - Payable to the Estate.....     | \$0.00              |
| Schedule E - Jointly Owned Property .....                                  | NA                  |
| Schedule F - Other Miscellaneous Assets.....                               | \$20,538.72         |
| Schedule G - Transfers During Decedent's Life Payable to the Estate.....   | \$0.00              |
| Schedule H - Powers of Appointment Payable to the Estate .....             | \$0.00              |
| Schedule I - Annuities and Retirement Accounts Payable to the Estate ..... | \$0.00              |
| <b>TOTAL GROSS VALUE OF PROBATE ESTATE .....</b>                           | <b>\$514,668.38</b> |
| <b>ENCUMBRANCES .....</b>                                                  | <b>(0.00)</b>       |
| <b>TOTAL NET WORTH OF PROBATE ESTATE / PROBATE ESTATE VALUE .....</b>      | <b>\$514,668.38</b> |

The undersigned, being sworn, states: That the following schedules contain a complete and accurate inventory and appraisal of all probate real and personal property of this estate so far as the undersigned is informed; that he/she has estimated and/or appraised all listed property at its fair market value, according to the best of his/her knowledge and ability.

SWORN to before me this 31st day of January 2020

Notary Public for South Carolina

My Commission Expires: 11.02.2027

Personal Representative

Signature:

Print Name:

Address:

Telephone (Work):

(Home):

(Cell):

(Email):

Co-Personal

Representative

Signature

Name:

Address:

Telephone (Work):

(Home):

(Cell)

(Email):

Attorney:

Desa Ballard

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Email:

desab@desaballard.com

| A. <b>REAL ESTATE</b> in Decedent's name alone or tenants in common (not as joint with right of survivorship). Describe each property by listing its full address, tax map number, deed book and page and description consistently (house, lot, buildings, acreage). Also list oil / mineral rights and time shares, if it is real property. If the property is encumbered, list the full fair market value of the property here and the encumbrance on Encumbrance section below                                                                                                                       | % Owned by Decedent | Fair Market Value of Decedent's Interest |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------------------|
| 1. None known                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                     |                                          |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                     |                                          |
| B. <b>STOCKS, BONDS</b> in Decedent's name alone or tenants in common (not as joint with right of survivorship). List each type of security and number of shares.                                                                                                                                                                                                                                                                                                                                                                                                                                       |                     |                                          |
| 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                     |                                          |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                     |                                          |
| C. <b>CASH, BANK ACCOUNTS, NOTES RECEIVABLES</b> in Decedent's name alone or as tenants in common. List each separate account type and institution and the last two digits of each account. List all bank accounts owned by Decedent alone or as tenants in common (checking, savings, CDs, money market, brokerage, employment bonus, cash award, final paycheck etc.), cash on hand, notes payable to Decedent, and survival action proceeds.                                                                                                                                                         |                     |                                          |
| 1.Per order of Judge Anderson on 01.03.2020, \$230,000 Note to Superior Tile Marble and Terrazzo Corporation became due and payable to the Estate 30 days after the death of Chris Combis and accrued interest at the rate of 7% per the terms of the note for a total value on the date of the order of \$487, 845.31. See ECF entry 304 case number :14-cv-01839-JFA                                                                                                                                                                                                                                  | 100%                | 230,000.00                               |
| 2. Interest due on Judgment (see #1 above)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 100%                | 257,845.31                               |
| 3. Diane M. Combis Household Account (funded by Chris Combis) (FC 138361298)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                     | 6,284.35                                 |
| D. <b>LIFE INSURANCE</b> payable to the Decedent's estate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                     |                                          |
| 1. None known                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                     |                                          |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                     |                                          |
| E. <b>JOINTLY OWNED PROPERTY – REPORTING IS NOT REQUIRED</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                     | N/A                                      |
| F. <b>ALL OTHER MISCELLANEOUS PERSONAL PROPERTY</b> in Decedent's name alone or as tenants in common. List below any tangible personal property, including household goods & furnishings, vehicles, boats/motors/trailers, mobile homes that are not de-titled (Include year/make/model/VIN, if applicable), airplanes, equipment, interest in a partnership or unincorporated business, articles or collections having either artistic or intrinsic value, including coins, guns, artwork, jewelry, etc., and any other miscellaneous probate items not listed elsewhere, including any digital assets |                     |                                          |
| 1. Personal items (clothes & 101 <sup>st</sup> Airborne jewelry)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 100%                | 100.00                                   |
| 2. Sharon Memorial Park 6 burial plats @ \$2,495 each                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 100%                | 14,970.00                                |
| 3. Rolex Watch                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 100%                | 5,200.00                                 |
| 4. Pistols                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 100%                | 225.00                                   |
| 5. Coin Collection produced by Diane Combis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                     | 43.72                                    |
| G. <b>TRANSFERS DURING DECEDENT'S LIFE PAYABLE TO ESTATE ONLY</b> Any transfers intended to take effect at death if payable to the Estate shall be reported. A trust created by Decedent in which income for life was retained by the Decedent, power to revoke or other incidents of ownership retained by the Decedent, lifetime transfers of real property in which Decedent retained life estate, etc.                                                                                                                                                                                              |                     |                                          |
| 1. None Known                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                     |                                          |
| H. <b>POWERS OF APPOINTMENT PAYABLE TO THE ESTATE ONLY</b> List property, both real and personal, over which Decedent possessed a Power of Appointment whether testamentary or otherwise, if such property is payable to the Estate.                                                                                                                                                                                                                                                                                                                                                                    |                     |                                          |
| 1. None known                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                     |                                          |
| I. <b>ANNUITIES AND IRA, ETC. PAYABLE TO THE ESTATE ONLY</b> List any annuities or retirement accounts owned by the Decedent and payable to the Estate.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                     |                                          |
| 1. None Known                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                     |                                          |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                     |                                          |

|                                                                                                                                                                                                                                 |               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>TOTAL PROBATE ESTATE VALUE</b>                                                                                                                                                                                               | \$ 514,668.38 |
| <b>ENCUMBRANCES</b> (e.g., mortgages, liens, judgments, etc., but not general debts of the estate). List debts of the Decedent secured by assets on the above schedule and describe the debt and the specific asset encumbered. |               |
| 1.                                                                                                                                                                                                                              |               |
| 2.                                                                                                                                                                                                                              |               |
| <b>TOTAL ENCUMBRANCES</b>                                                                                                                                                                                                       | \$            |

STATE OF SOUTH CAROLINA

COUNTY OF: LANCASTER

IN THE MATTER OF: CHRIS COMBIS

IN THE PROBATE COURT

PROOF OF DELIVERY

CASE NUMBER: 2012ES2900415

On the 31st day of January, 2020, I mailed or delivered the following document, Inventory and Appraisement Supplemental #002

- ☒ A copy of which is attached hereto and incorporated herein, or  
☐ The original of which is on file with the court and incorporated herein,

Delivery was accomplished by the following method (check appropriate box):

- ☐ personal delivery      ☒ ordinary first class mail  
☐ certified mail      ☐ registered mail

to each of the following persons at the address shown:

| NAME          | ADDRESS                                                                                        |
|---------------|------------------------------------------------------------------------------------------------|
| Linda Combis  | c/o Pete Nosal, Esquire<br>825 Gold Hill Road, Unit 201<br>Fort Mill South Carolina 29708      |
| Mary Combis   | c/o Pete Nosal, Esquire<br>825 Gold Hill Road, Unit 201<br>Fort Mill South Carolina 29708      |
| George Combis | c/o David Redding, Esquire<br>201 South Tryon St. Suite 915<br>Charlotte, North Carolina 28202 |
| Diane Combis  | c/o David Redding, Esquire<br>201 South Tryon St. Suite 915<br>Charlotte, North Carolina 28202 |

SWORN to before me this 31st day of  
January, 2020

Elizabeth K. Cooper  
Notary Public for South Carolina  
My Commission Expires: 11.01.2023

Signature: Mara T. Ballard  
Name: Mara T. Ballard  
Address: Post Office Box 6338  
West Columbia, South Carolina 29171  
Telephone (O): 803.796.9299  
(H):  
E-mail: mara@desaballard.com

Signature: \_\_\_\_\_  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Telephone (O): \_\_\_\_\_  
(H): \_\_\_\_\_  
E-mail: \_\_\_\_\_



## REDDING | JONES

March 16, 2020

*Via First-Class Mail*

South Carolina Office of Court Administration  
1220 Senate Street, Suite 200  
Columbia, SC 29201

**Re:** In the Matter of the Estate of Chris Combis  
Appellate Case No. 2020-000021

Dear Sir or Madam:

Pursuant to Rule 207 of the SCACR and your recent correspondence dated March 10<sup>th</sup>, we are enclosing copies of emails with the court reporter with regard to the transcript for your record.

A Joint Motion for Extension of Time was submitted for filing with the SC Court of Appeals on March 10, 2020 requesting an extension of 14 days, through and including April 2, 2020. Please feel free to contact me should you have any questions; otherwise, we thank you for your assistance with this matter.

Sincerely,

Ty K. McTier

Encl:

cc: Brian McCoy, Douglas Truslow

REDDING | JONES, PLLC  
2907 PROVIDENCE ROAD | SUITE 303  
CHARLOTTE | NORTH CAROLINA | 28211  
TELEPHONE & FAX: 704-900-2215  
WWW.REDDINGJONES.COM

3/16/20, 12:36 PM

**Re: Combis/Ballard.SC--Transcript**

Watkins, Michael C. &lt;MWatkins@scccourts.org&gt;

Mon 2/17/2020 4:08 PM

To: Ty McTier &lt;tmctier@reddingjones.com&gt;

 1 attachments (115 KB)

Ballard vs. Combis, 12-18-19 hrg.pdf;

Attached is the transcript. Is it okay to send a PDF invoice and certificate page, or would you prefer I mail them? Either way is fine.

Thanks for your patience!

Mike

---

From: Ty McTier <tmctier@reddingjones.com>

Sent: Wednesday, February 12, 2020 2:59:01 PM

To: Watkins, Michael C.

Subject: Re: Combis/Ballard.SC--Transcript

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December 18th was the hearing date.

Ty K. McTier, Associate

2907 Providence Road, Suite 303

Charlotte, North Carolina 28211

Telephone | 704-900-2215 x113

E-mail | tmctier@reddingjones.com

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3/16/20, 12:36 PM

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---

From: Ty McTier <tmctier@reddingjones.com>  
Sent: Wednesday, February 12, 2020 2:57 PM  
To: Watkins, Michael C. <MWatkins@sccourts.org>  
Subject: Re: Combis/Ballard.SC--Transcript

Early December, the order was entered on the 31st I believe.

Ty K. McTier, Associate

2907 Providence Road, Suite 303

Charlotte, North Carolina 28211

Telephone | 704-900-2215 x113

E-mail | tmctier@reddingjones.com

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---

From: Watkins, Michael C. <MWatkins@sccourts.org>  
Sent: Wednesday, February 12, 2020 2:41 PM  
To: Ty McTier <tmctier@reddingjones.com>  
Subject: Re: Combis/Ballard.SC--Transcript

3/16/20, 12:36 PM

what was the date of the hearing again?

---

From: Ty McTier <tmctier@reddingjones.com>  
Sent: Wednesday, February 12, 2020 1:38:37 PM  
To: Watkins, Michael C.  
Cc: 'douglastruslow@truslowlaw.com'; Brian S. McCoy  
Subject: Re: Combis/Ballard.SC--Transcript

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Michael,

Great thank you!

Ty K. McTier, Associate

2907 Providence Road, Suite 303

Charlotte, North Carolina 28211

Telephone | 704-900-2215 x113

E-mail | tmctier@reddingjones.com

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---

From: Watkins, Michael C. <MWatkins@sccourts.org>  
Sent: Wednesday, February 12, 2020 1:29 PM

3/16/20, 12:36 PM

To: Ty McTier <tmctier@reddingjones.com>  
Subject: Re: Combis/Ballard.SC--Transcript

Hey Ty,

I am completing a transcript of a jury trial now, yours is next. I am hoping to get it to you next week.

Thanks, Mike

---

From: Ty McTier <tmctier@reddingjones.com>  
Sent: Wednesday, February 12, 2020 1:09:39 PM  
To: Watkins, Michael C.  
Cc: Brian S. McCoy; 'douglastruslow@truslowlaw.com'; David Redding  
Subject: Combis/Ballard.SC--Transcript

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Michael,

I hope you are doing well. I just wanted to check with the status of the transcript and if you need additional time.

Ty K. McTier, Associate

2907 Providence Road, Suite 303

Charlotte, North Carolina 28211

Telephone | 704-900-2215 x113

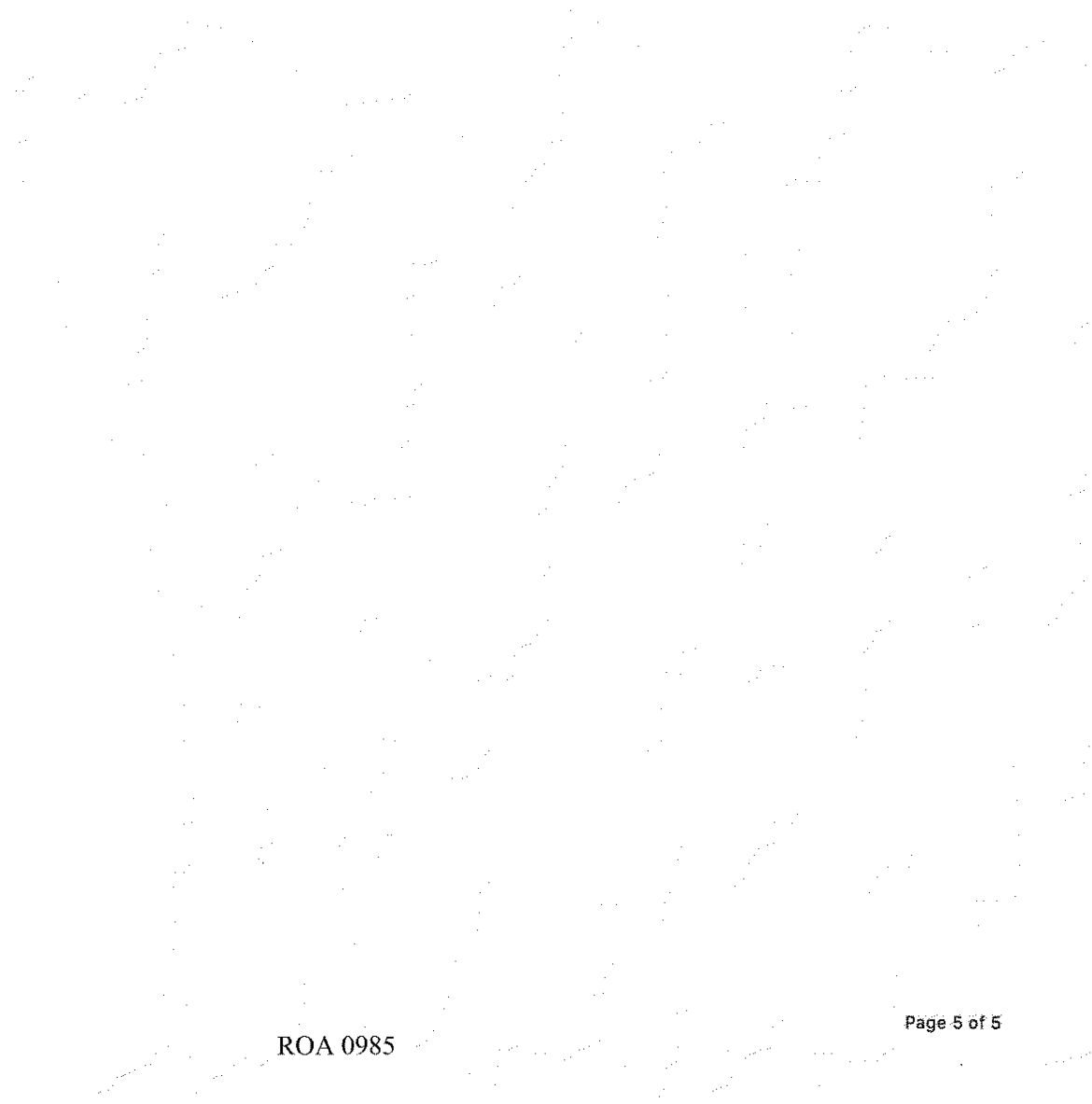
E-mail | tmctier@reddingjones.com

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3/16/20, 12:36 PM

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3/16/20, 12:37 PM

Combis/Ballard--Transcript

Ty McTier <tmctier@reddingjones.com>

Tue 2/25/2020 1:35 PM

To: 'douglastruslow@truslowlaw.com' <douglastruslow@truslowlaw.com>

Cc: Brian S. McCoy <bmc coy@mccoylawfirm.com>

■ 1 attachments (114 KB)

Ballard vs. Combis%2c 12-18-19 hrg.pdf;

Doug,

I believe you ordered a transcript as well, but wanted to share this with you just in case you have not received it.

Ty K. McTier, Associate

2907 Providence Road, Suite 303

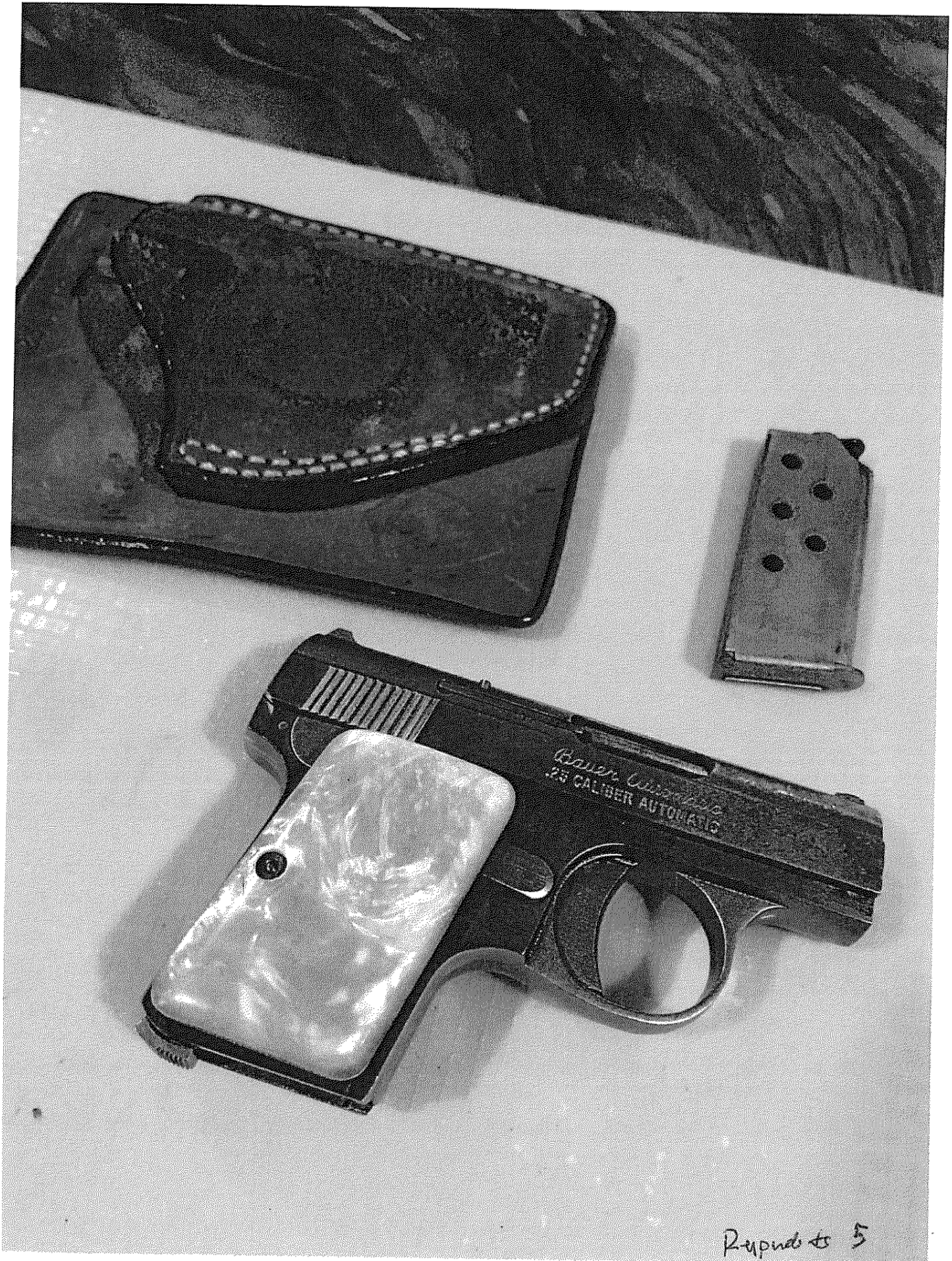
Charlotte, North Carolina 28211

Telephone | 704-900-2215 x113

E-mail | tmctier@reddingjones.com

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Replied to 5



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Respondents 6