

**RECEIVED**

**Sep 15 2021**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge  
Walton J. McLeod IV, Circuit Court Judge

---

Appellate Case No. 2020-001406  
Civil Action No. 2017-CP-32-02204

---

ARM Quality Builders, LLC, d/b/a ARM Quality Builders, . . . . . Appellant,

v.

Joseph A. Golson and Lycia B. Golson and Branch Banking Trust Company, . . . . . Respondents,

AND

Joseph A. Golson and Lycia B. Golson, . . . . . Third-Party Respondents,

v.

Ahmad Mazloom, . . . . . Third-Party Appellant.

---

**MOTION FOR *IN CAMERA* REVIEW OF EXHIBIT**

---

E. Wade Mullins III  
Chelsea J. Clark  
Bruner, Powell, Wall & Mullins, LLC  
P.O. Box 61110  
Columbia, S.C. 29260

*Attorneys for Respondents*

## MOTION

This matter is before the Court on appeal from multiple orders entered following motion hearings and a trial in the underlying case. One such order awarded attorney's fees to Respondents and Third-Party Respondents, Joseph A. Golson and Lycia B. Golson ("Respondents"). *See R.* pp. 76–77. The award was based on statutory remedies when the court determines a mechanic's lien must be dissolved. *See R.* pp. 63–75 (order dissolving lien and reviewing relevant law). The matter the of the fees has been fully briefed to this Court by the parties.

However, one matter remains outstanding. In reviewing Respondents' request for an award of fees, Judge Clifton Newman reviewed a statement of the fees incurred by Respondents *in camera* to avoid any waiver of attorney-client or work product privilege that may result from public filing, or even filing under seal, of the statement. Detailed fee statements can include privileged topics of conversation with clients, work product and strategy of counsel, as well as mental impressions of counsel. As this Court well knows, attorneys in this state must be exceedingly cautious about protecting privileged information. Because of this caution, the document was never received by Appellants and therefore is not included in the filed Record.

## REQUESTED RELIEF

Therefore, Respondents move for the Court's approval to submit the fee statement *in camera*; for the Court's approval to have the document considered as part of the Record for the Court's review; and for the Court's direction that the document not be published on C-Track.

[remainder of page intentionally blank]

## CONSULTATION

Counsel for Respondents has consulted with Counsel for Appellants, who does not oppose this motion to submit the same document reviewed by Judge Newman to the Court of Appeals in the same fashion as below.

Respectfully submitted,

**BRUNER, POWELL, WALL & MULLINS, LLC**

*s/ Chelsea J. Clark*

E. Wade Mullins III, Bar No. 3525

Chelsea J. Clark, Bar No. 102211

Post Office Box 61110 (29260)

1735 St. Julian Place, Suite 200 (29204)

Columbia, South Carolina

(803) 252-7693

[wmullins@brunerpowell.com](mailto:wmullins@brunerpowell.com)

[cclark@brunerpowell.com](mailto:cclark@brunerpowell.com)

*Attorneys for Respondents*

Columbia, South Carolina  
September 15, 2021

RECEIVED

Sep 15 2021

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

The Honorable Clifton Newman, The Honorable Walton J. McLeod, IV  
Lexington County

Appellate Case No. 2020-001406  
Circuit Court case No. 2017-CP-32-02204

ARM Quality Builders, LLC, d/b/a ARM Quality Builders, .....Appellant,

v.

Joseph A. Golson and Lycia B. Golson and Branch Banking and Trust Company, ...Respondents

AND

Joseph A. Golson and Lycia B. Golson, .....Third-Party Respondents

v.

Ahmad Mazloom,.....Third-Party Appellant

**PROOF OF SERVICE**

I, the undersigned employee of Bruner, Powell, Wall & Mullins, LLC, do hereby certify that I have served the Appellants/Third-Party Appellants with the **Motion for In Camera Review of Exhibit** to be included in the by electronic mail and by depositing copies of same in the United States Mail, with sufficient postage affixed thereto, on the 15th day of September 2021, addressed as follows:

James Randall Davis, Esq.,  
S.C. Bar No.: 1580  
Davis Frawley, LLC  
P.O. Box 489  
Lexington, SC 29071  
(803) 359-2512  
*Attorneys for Appellant/Third-Party  
Appellant*

*s/Lacey E. Segars*  
Lacey E. Segars, Paralegal  
Bruner, Powell, Wall & Mullins, LLC

September 15, 2021

BRUNER, POWELL, WALL & MULLINS, LLC

ATTORNEYS AND COUNSELORS AT LAW

1735 ST. JULIAN PLACE, SUITE 200

POST OFFICE BOX 61110

COLUMBIA, SOUTH CAROLINA 29260-1110

TELEPHONE 803-252-7693

FAX 803-254-5719

[WWW.BRUNERPOWELL.COM](http://WWW.BRUNERPOWELL.COM)

WARREN C. POWELL, JR., P.A.\*\*

HENRY P. WALL

E. WADE MULLINS III, P.A.

WESLEY D. PEEL, P.A.

JOEY R. FLOYD, P.A.

BENJAMIN C. BRUNER, P.A.

JAMES L. BRUNER (RETIRED)

CHELSEA J. CLARK

J. COLE HANCOCK

\*\* Also Admitted in District of Columbia

AUTHOR'S E-MAIL: LSEGARS@BRUNERPOWELL.COM

September 15, 2021

**VIA U.S. MAIL & ELECTRONIC MAIL**

South Carolina Court of Appeals

Attn: The Honorable Jenny Abbott Kitchings

Clerk of Court

1220 Senate Street (29201)

P.O. Box 11629

Columbia, South Carolina 29211

RECEIVED

Sep 15 2021

SC Court of Appeals

Re: *ARM Quality Builders, LLC, d/b/a ARM Quality Builders v. Joseph A. Golson and  
Lycia B. Golson, et al*

Appellate Case No. 2020-002406

BPWM File: 7-2873.100

Dear Ms. Kitchings:

Enclosed please find the *Motion for In Camera Review of Exhibit* regarding the above referenced matter. I am mailing a hard copy of the same and enclosing a check for \$50.00 to cover the filing fee. I am serving all other parties in this matter by copy of this letter and email. Please let me know if the Court requires anything further.

Thanking you, and with kind regards, I am

Very truly yours,

*Lacey Segars*

Lacey E. Segars

Paralegal

cc: James Randall Davis, Esq.