

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

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

Timothy J. Saj,

Appellant,

v.

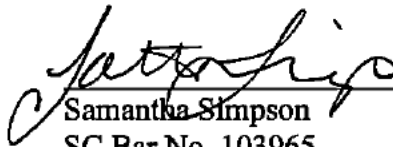
Haven at Regent Park,

Respondent,

RESPONDENT'S MOTION TO DISMISS

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

Respectfully submitted this 30 day of September, 2021.

A handwritten signature in cursive script, appearing to read "S. Simpson", written over a horizontal line.

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

THE STATE OF SOUTH CAROLINA
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Haven at Regent Park,

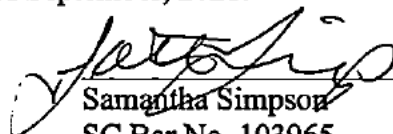
Respondent,

PROOF OF SERVICE

I certify that I have served **Respondent's Motion to Dismiss** by depositing a copy of it in the United States Mail, postage prepaid and via certified mail, on **September 30, 2021**, addressed to the following parties:

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

Respectfully submitted this 30 day of September, 2021.



Samantha Simpson
SC Bar No. 103965
Brownlee Whitlow & Praet, PLLC
1850 E 3rd Street, Suite 350
Charlotte, North Carolina 28204
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Attorneys for Respondent



Brownlee Whitlow & Praet
PROPERTY SOLUTIONS LAW

Samantha Simpson
Licensed in NC and SC
ssimpson@bwpf-law.com
Phone/Fax: 704.594.5558

September 30, 2021

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

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SC Court of Appeals

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

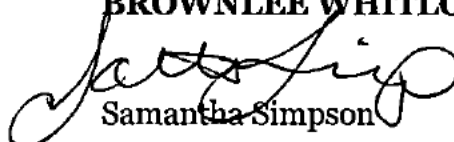
Dear Ms. Kitchings,

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

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

Sincerely,

BROWNLEE WHITLOW & PRAET, PLLC


Samantha Simpson

SS/
Enclosures as stated above

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

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

SHIP DATE: 30SEP21
ACTWGT: 1.87 LB
CAD: 108681757/NET4400

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

BILL-SENDER

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

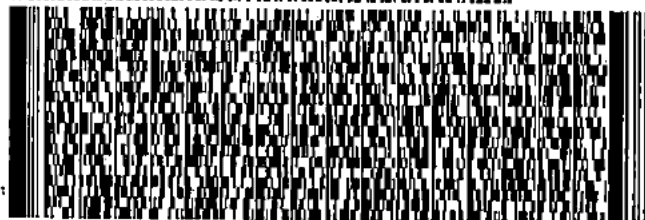
COLUMBIA SC 29201

(803) 734-1890
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