

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

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

RECEIVED

OCT 01 2021

SC Court of Appeals

Timothy Saj,

Appellant,

v.

Haven at Regent Park,

Respondent.

MEMO IN SUPPORT OF RESPONDENT'S MOTION TO DISMISS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

16. On July 15, 2021, the South Carolina Court of Appeals issued an Order granting Appellant through and including August 11, 2021 to serve and file Appellant's initial brief and designation of matter.

17. On August 16, 2021, Respondent received a hand-written, 2-page document via U.S. Mail titled "[INITIAL] BRIEF OF APPELLANT". However, the purported initial brief of

the Appellant was partially illegible and incomplete as it was cut-off on the bottom of the second page.

18. On or about September 8, 2021, Respondent's counsel checked the South Carolina Appellate Case Management System to confirm whether Appellant had complied with the Court's Order.

19. Upon seeing that an initial brief had not been uploaded to the South Carolina Appellate Case Management System, Respondent's counsel emailed Tyler P. Clark, the clerk assigned to this matter, to ask whether the initial brief had been received but was being held for quarantine due to COVID-19.

20. To date, Respondent's counsel has not been served with Appellant's initial brief as required by the South Carolina Rules of Appellate Court.

21. Since the initiation of this appeal on September 3, 2020, Appellant has continuously failed to follow the South Carolina Appellate Court Rules and has disregarded this Court's Orders and letters of deficiency.

22. Appellant's purported initial brief is no exception.

23. Appellant failed to comply with SCACR Rule 208(a)(1) by failing to serve Respondent's counsel.

24. Appellant failed to comply with SCACR Rule 208(a)(4) by failing to file and serve his initial brief within the time prescribed by the Order entered on July 15, 2021.

25. Pursuant to SCACR Rule 208(a)(4), Appellant's appeal should be dismissed.

26. Appellant failed to comply with SCACR Rule 208(b)(1)(A), (C), (D), and (E) by failing to include a table contents, a statement of the case, a standard of review with relevant case law, and an argument citing any authority or record on appeal.

27. further, Appellant failed to comply with SCACR Rule 208(b)(8) by failing to inform to the requirements of SCACR Rule 267.

28. Specifically, Appellant failed to: (1) sign his purported initial brief as required by SCACR Rule 267 (b); (2) type or machine duplicate his purported initial brief as required by SCACR Rule 267(c); and (3) to use proper margins as required by SCACR Rule 267(d).

29. Pursuant to SCACR Rule 267(g), the clerk of the appellate court shall insure compliance with SCACR Rule 267 *before* accepting any papers or filing. Therefore, Appellant's purported initial brief, as filed, should not have been accepted by the clerk.

30. The South Carolina Supreme Court confirmed in *State v. Burton*, that "[a] pro se litigant who knowingly elects to represent himself assumes full responsibility for complying with substantive and procedural requirements of the law." *The State v. Kenneth Andrew Burton*, 356 S.C. 259, 266 (S.C. 2003).

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

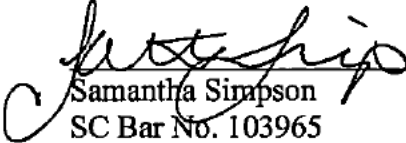
32. To date, Lessee has failed to execute a bond as required.

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

Therefore, Respondent respectfully requests this Honorable Court dismiss Appellant's Appeal as Appellant has failed to meet conditions precedent by failing to comply with the terms of the aforementioned bond to stay and has failed to comply with this Court's Order entered July

15, 2021, requiring Appellant to file a complete initial brief in accordance with the South Carolina Appellate Rules of Court no later than August 11, 2021.

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
Telephone & E-Fax (704) 594-5558
Email: ssimpson@bwpf-law.com
Attorney for Haven at Regent Park

FORM 4

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

JUDGMENT IN A CIVIL CASE
 CASE NUMBER 2020CP4600381

Timothy Saj		Haven At Regent Park	
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PLAINTIFF(S)	DEFENDANT(S)
Submitted by:	Attorney for: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

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

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 DAVID HAMILTON
 C.C.P. & C.S.
 YORK COUNTY

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

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

ORDER INFORMATION

This order ends does not end the case.

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

INFORMATION FOR THE JUDGMENT INDEX

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

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

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

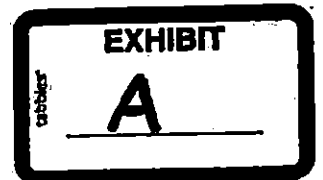
The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time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

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


 Stephante Wood
 Magistrate Court Judge

7313
 Judge Code

2-7-20
 Date



For Clerk of Court Office Use Only

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

Timothy Saj 3108 Cool Bridge Circle Fort Mill, SC 29715

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

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

David Hamilton

Court Reporter

David Hamilton - Clerk of Court

Court Reporter:

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

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

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

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DAVID BRAMHILLTON
C. C. P. R. & GS
YORK COUNTY, SC

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)

IN THE MAGISTRATES COURT

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

ORDER DISMISSING APPEAL

vs.)

Common Pleas Case No. 2020CP4600381

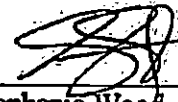
Timothy Saj,)
)
Respondant(s))

Magistrate Case No. 2019CV4610401820

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

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

Respectfully submitted,



Stephanie Wood, Magistrate
February 7, 2020

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2020CP4600782

Timothy J Saj.
PLAINTIFF(S)

Haven At Regent Park
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

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

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

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

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

ORDER INFORMATION

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

For Clerk of Court Office Use Only

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

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

NAMES OF TRADITIONAL FILERS SERVED BY MAIL



ELECTRONICALLY FILED - 2020 Mar 05 2:10 PM - YORK - COMMON PLEAS - CASE#2020CP4600782

Court Reporter:

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



York Common Pleas

Case Caption: Timothy J Saj VS Haven At Regent Park
Case Number: 2020CP4600782
Type: Order/Electronic Form 4

So Ordered

s/Daniel D. Hall 2753

Electronically signed on 2020-03-05 13:52:12 page 3 of 3

ELECTRONICALLY FILED - 2020 Mar 05 2:10 PM - YORK - COMMON PLEAS - CASE#2020CP4600782

FILED-RECEIVED

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

Timothy J. Saj,)
Appellant)
vs.)
The Haven at Regent Park)
Respondent)
DAVID HAMILTON)
C.C.C.P. & GS)
YORK COUNTY, SC)
RETURN OF CIVIL APPEAL)
Common Pleas No. 2020CP4601045)
Magistrate Civil No. 2019CV4610401820)

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

UNTIMELY SERVICE OF NOTICE OF APPEAL:

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

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

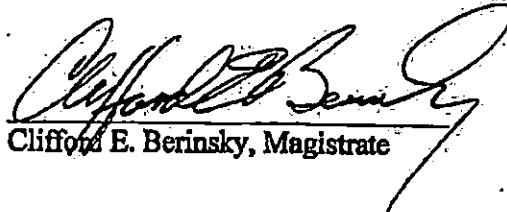
Failure to serve the magistrate with notice of appeal within the statutorily required period is fatal, and the Circuit Court must dismiss the appeal, being without jurisdiction to hear same. Scott v. Pratt, 9 SC 82 (1878); Davis v. Vaughn, 7 SC 342 (1876); Foot & Son v. Williams, 18 SC 601 (1883); Manuel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



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

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

Respectfully submitted,


Clifford E. Berinsky, Magistrate

March 17, 2020

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2020CP4601045

Timothy J Saj
PLAINTIFF(S)

Haven At Regent Park
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

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

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

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

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

ORDER INFORMATION

This order ends does not end the case.

See Page 2 for additional information.

For Clerk of Court Office Use Only

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

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

NAMES OF TRADITIONAL FILERS SERVED BY MAIL



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Court Reporter:

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

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

Timothy J. Saj,

Appellant,

v.

Haven at Regent Park,

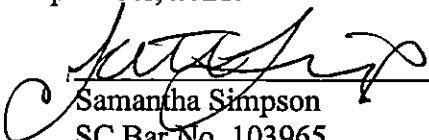
Respondent,

PROOF OF SERVICE

I certify that I have served **Respondent's Memo in Support of Respondent's Motion to Dismiss** by depositing a copy of it in the United States Mail, postage prepaid and via certified mail, on **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
Telephone & E-Fax (704) 594-5558
Email: ssimpson@bwpf-law.com
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

VIA FEDERAL EXPRESS

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OCT 01 2021

SC Court of Appeals

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

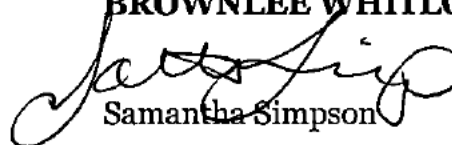
Dear Ms. Kitchings,

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/NET4401

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

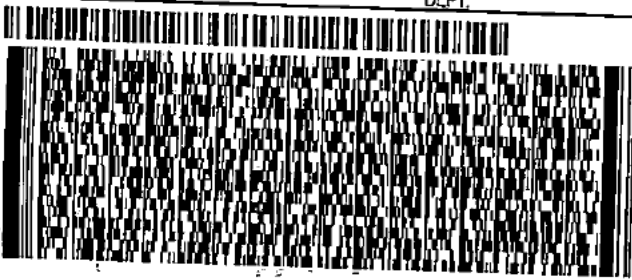
COLUMBIA SC 29201

(803) 734-1890
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PO:

REF: 30665-00002, ACV

DEPT:

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GE USCA Court of Appeals sc-us **CAE**

