

STATE OF SOUTH CAROLINA )

COUNTY OF CHARLESTON )

K-Con, Inc. )

Plaintiff(s) )

vs. )

King Street Enterprises, LLC and Ohio Imaging Associates, Inc. )

Defendant(s) )

Submitted By: William A. Scott
Address: Pedersen & Scott, P.C., 775 St. Andrews Boulevard, Charleston, SC 29407

SC Bar #: 15148
Telephone #: 843-556-5656
Fax #: 843-556-5635
Other:
E-mail: bscott@pslawpc.com

2018-CP-10-3825
IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

-CP-

2018 AUG -1 AM 11:43
FILED
JULIE J. ARNSTRENG
CLERK OF COURT

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint.
NON-JURY TRIAL demanded in complaint.
This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- Contracts: Breach of Contract (140)
Torts - Professional Malpractice: Dental Malpractice (200), Legal Malpractice (210), Medical Malpractice (220)
Torts - Personal Injury: Conversion (310), Motor Vehicle Accident (320), Premises Liability (330), Products Liability (340), Personal Injury (350), Wrongful Death (360), Assault/Battery (370), Slander/Libel (380), Other (399)
Real Property: Claim & Delivery (400), Condemnation (410), Foreclosure (420), Mechanic's Lien (430), Partition (440), Possession (450), Building Code Violation (460), Other (499)
Inmate Petitions: PCR (500), Mandamus (520), Habeas Corpus (530), Other (599)
Administrative Law/Relief: Reinstatement License (800), Judicial Review (810), Relief (820), Permanent Injunction (830), Forfeiture-Petition (840), Forfeiture-Consent Order (850), Other (899)
Judgments/Settlements: Death Settlement (700), Foreign Judgment (710), Magistrate's Judgment (720), Minor Settlement (730), Transcript Judgment (740), Lis Pendens (750), Transfer of Structured Settlement Payment Rights Application (760), Confession of Judgment (770), Petition for Workers Compensation Settlement Approval (780), Other (799)
Appeals: Arbitration (900), Magistrate-Civil (910), Magistrate-Criminal (920), Municipal (930), Probate Court (940), SCDOT (950), Worker's Comp (960), Zoning Board (970), Public Service Comm. (990), Employment Security Comm (991), Other (999)
Special/Complex /Other: Environmental (600), Automobile Arb. (610), Medical (620), Other (699), Sexual Predator (510), Pharmaceuticals (630), Unfair Trade Practices (640), Out-of State Depositions (650), Motion to Quash Subpoena in an Out-of-County Action (660), Pre-Suit Discovery (670)

Submitting Party Signature: [Signature]

Date: 07/31/2018

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous



**FOR MANDATED ADR COUNTIES ONLY**

Aiken, Allendale, Anderson, Bamberg, Barnwell, Beaufort, Berkeley, Calhoun, Charleston, Cherokee, Clarendon, Colleton, Darlington, Dorchester, Florence, Georgetown, Greenville, Hampton, Horry, Jasper, Kershaw, Lee, Lexington, Marion, Oconee, Orangeburg, Pickens, Richland, Spartanburg, Sumter, Union, Williamsburg, and York

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

**You are required to take the following action(s):**

1. The parties shall select a neutral and file a “Proof of ADR” form on or by the 210<sup>th</sup> day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the “Notice of Intent to File Suit” or as the court directs. (Medical malpractice mediation is mandatory statewide.)
4. Cases are exempt from ADR only upon the following grounds:
  - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
  - b. Requests for temporary relief;
  - c. Appeals
  - d. Post Conviction relief matters;
  - e. Contempt of Court proceedings;
  - f. Forfeiture proceedings brought by governmental entities;
  - g. Mortgage foreclosures; and
  - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

**Please Note: You must comply with the Supreme Court Rules regarding ADR. Failure to do so may affect your case or may result in sanctions.**

8/1/18  
11:46 AM

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

2018-CP-10-3825  
IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
CASE NO. 18-CP-10-

FILED  
2018 AUG - 1 AM 11:46  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

K-CON, INC.,  
  
Plaintiff,  
  
v.  
  
KING STREET ENTERPRISES, LLC, and  
OHIO and IMAGING ASSOCIATES, INC.,  
  
Defendants.

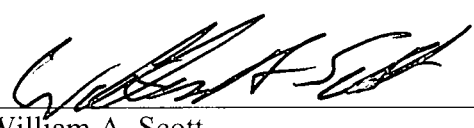
LIS PENDENS

TO: ALL CONCERNED PARTIES

NOTICE IS HEREBY GIVEN that an action has been commenced in Charleston County, South Carolina by Plaintiff against the above-named Defendants in which Plaintiff, K-Con, Inc. seeks to foreclose an Amended Mechanic's Lien it filed in the RMC Office for Charleston County, South Carolina in Book 0726, Page 262, against the property described in Exhibit "A" attached hereto.

Respectfully submitted,

PEDERSEN & SCOTT, P.C.



William A. Scott  
775 St. Andrews Boulevard  
Charleston, SC 29407  
Tel: (843) 556-5656  
Fax: (843) 556-5635  
Email: [bscott@pslawpc.com](mailto:bscott@pslawpc.com)

*Attorney for the Plaintiff  
K-Con, Inc.*

Dated: July 31, 2018

**EXHIBIT "A"**  
Legal Description of Property

Property known as 484 King Street, Charleston, SC 29403:

ALL that certain piece, parcel or tract of land, together with the building and improvements located thereon, situate, lying and being in the City of Charleston, Charleston County, South Carolina and being more particularly described as follows:

ALL of that lot of land, with the building thereon, situate on the East side of King Street and known by the No. 484 on said street.

Measuring and containing on the front of King Street thirty (30') feet; one hundred sixty (160') feet in depth; and on the East or back line twenty-five (25') feet; be all the said dimensions all more or less.

Butting and bounding North on lands now or late of Rabin Family Associates Limited Partnership and formerly of Graman; East on lands now or late of the South Carolina Railroad Building Horizontal Property Regime and formerly of William Rouse, Sr.; South on land of 484 King Street, LLC and formerly of Gabriel E. Manigault; and West by King Street.

BEING the same property conveyed to King Street Enterprises, LLC by: (1) Warranty Deed of 484 King Street, LLC dated July 3, 2012 and recorded on July 5, 2012 in Book 0262, at Page 409 in the Charleston County RMC Office; (2) Quit Claim Deed of 484 King Street, LLC dated July 3, 2012 and recorded on July 5, 2012 in Book 0262, at Page 410 in the Charleston County RMC Office; and (3) Quit Claim Deed of 480 King Street, LLC dated as of November 21, 2014 and recorded on December 10, 2014 in Book 0445, at Page 569 in the Charleston County RMC Office.

TMS# 460-12-02-026