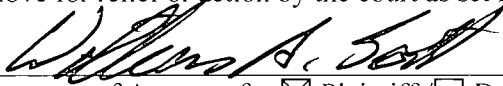


STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 K-Con, Inc.,)
 _____)
 Plaintiff,)
 vs.)
)
 King Street Enterprises, LLC and Ohio)
 Imaging Associates, Inc.,)
 _____)
 Defendant.)

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

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

Plaintiff's Attorney: William A. Scott, Bar No. 15148 Address: Pedersen & Scott, P.C., 775 St. Andrews Blvd., Charleston, SC 29407 Phone: 843-556-5656 Fax 843-556-5635 E-mail: bscott@pslawpc.com Other: _____	Defendant's Attorney: Brent S. Halversen, Bar No. _____ Address: Brent Souther Halversen, LLC, 751 Johnnie Dodds Blvd., Suite 200, Mt. Pleasant, SC 29464 Phone: 843-284-5790 Fax: 864-326-4844 E-mail: brent@halversenlaw.com Other: _____
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information	
Nature of Motion: Motion for Summary Judgment Estimated Time Needed: 15 mins Court Reporter Needed: <input type="checkbox"/> YES / <input checked="" type="checkbox"/> NO	
SECTION II: Motion/Order Type	
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant	October 1, 2019 Date submitted
SECTION III: Motion Fee	
<input checked="" type="checkbox"/> PAID – AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support (check reason) <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCP) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	
JUDGE'S SECTION	
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____
CLERK'S VERIFICATION	
Collected by: _____ Date Filed: _____ <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED – AMOUNT DUE: \$ _____	

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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

K-CON, INC.,

Plaintiff,

v.

KING STREET ENTERPRISES, LLC, and
OHIO IMAGING ASSOCIATES, INC.,

Defendants.

**NOTICE OF MOTION
AND MOTION FOR SUMMARY
JUDGMENT AS TO ALL OF THE
COUNTERCLAIMS BY THE
DEFENDANT, OHIO IMAGING
ASSOCIATES, INC.**

FILED
2019 OCT -3 AM 11:39
JULIE J. ARISTON
CLERK OF COURT

YOU WILL PLEASE TAKE NOTICE that the undersigned will, ten (10) days or as soon thereafter as counsel may be heard, move before this Court for summary judgment as to all of the counterclaims by the Defendant, Ohio Imaging Associates, Inc.

The basis for this motion is that all of counterclaims alleged by Ohio Imaging Associates, Inc., must be dismissed as a matter of law pursuant to S.C. Code § 33-15-102, Consequences of transacting business without authority. Based on a review of the South Carolina Secretary of State's website, <https://businessfilings.sc.gov/BusinessFiling/Entity/Search>, Ohio Imaging Associates, Inc. is not authorized to conduct business in South Carolina. (See Attachment 1). Accordingly, Plaintiff requests the Court issue an Order dismissing all of the counterclaims filed by Ohio Imaging Associates, Inc.

The motion is supported by the applicable law, affidavits, memorandums and arguments of counsel as may be appropriate.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

PEDERSEN & SCOTT, P.C.

A handwritten signature in black ink, appearing to read "William A. Scott", written over a horizontal line.

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

ATTORNEY FOR PLAINTIFF

Dated this 1st day of October, 2019

Business Entities Online

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Business Name Search

Search

Enter the business name of the company you wish to view and click "Search." Find the business in the results below and click to view the official business profile and relevant information.

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Enter the business name of the company for which you wish to file documents and click search. Find the business in the results below and click to view the official business profile. From your business's profile click the "Add Filing" button.

Results displayed will show entities that contain your search criteria.

Search by Business Name

Begins With ▼	Ohio Imaging Associates, Inc.
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This name is available

No Results

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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

K-CON, INC.,

Plaintiff,

v.

KING STREET ENTERPRISES, LLC, and
OHIO IMAGING ASSOCIATES, INC.,

Defendants.

FILED
2019 OCT -3 AM 11:39
JULIE J. ARNSTROM
CLERK OF COURT

CERTIFICATE OF SERVICE

The undersigned paralegal at Pedersen & Scott, P.C., hereby certifies that a copy of the NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT in the above-captioned matter has been placed in an envelope, and addressed and mailed via U.S. Mail to:

Brent Halversen, Esq.
Brent Souther Halversen, LLC
751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464


Tracy E. Braceland
Paralegal

Dated: October 1, 2019
Charleston, SC

PEDERSEN & SCOTT, P.C.
ATTORNEYS AT LAW

P 843-556-5656
F 843-556-5635
bscott@pslawpc.com

October 1, 2019

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad Street, Suite 106
Charleston, SC 29401

RE: K-Con, Inc. v. King Street Enterprises, LLC and Ohio Imaging Associates, Inc.
C.A. No. 2018-CP-10-3825

Dear Ms. Armstrong:

Enclosed for filing in the above-referenced matter, please find an original and one copy of the Motion Slip and Notice of Motion and Motion for Summary Judgment, together with a check in the amount of \$25.00. Please file the original and return a stamped-in copy in the enclosed return addressed stamped envelope.

Your assistance in this matter is greatly appreciated. Please call me if you have any questions.

With regards,



William A. Scott

WAS/teb
Enclosures

cc: K-Con, Inc. (w/enc.)
Brent S. Halversen, Esq. (w/enc.)