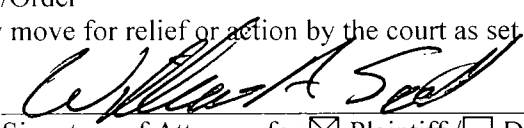


STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 K-Con, Inc.,)
 _____)
 Plaintiff,)
 vs.)
)
 King Street Enterprises, LLC and Ohio)
 Imaging Associates, Inc.,)
 _____)
 Defendant.)

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: Leave to File Amended Complaint 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. <div style="display: flex; justify-content: space-between; align-items: center; margin-top: 20px;"> <div style="text-align: center;">  Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant </div> <div style="text-align: right;"> June 24, 2019 Date submitted </div> </div>									
SECTION III: Motion Fee <input checked="" type="checkbox"/> PAID – AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason) <table style="margin-left: 20px; border: none;"> <tr> <td><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</td> </tr> <tr> <td><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</td> </tr> <tr> <td><input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party</td> </tr> <tr> <td><input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief</td> </tr> <tr> <td><input type="checkbox"/> Motion for Stay in Bankruptcy</td> </tr> <tr> <td><input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)</td> </tr> <tr> <td><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: _____</td> </tr> <tr> <td><input type="checkbox"/> Other: _____</td> </tr> </table>		<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<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: _____
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<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 LEAVE TO FILE
AMENDED COMPLAINT**

FILED
2019 JUN 26 AM 11:52
JULIE J. ARMSTRONG
CLERK OF COURT

YOU WILL PLEASE TAKE NOTICE that the Plaintiff, K-Con, Inc., by and through its undersigned counsel, moves before this Court for an Order permitting the Plaintiff to amend the Complaint.

The Plaintiff moves to amend the Complaint to name the bond in place of the property in the mechanic's lien foreclosure action pursuant to 29-5-110. The basis for the motion is that the Defendant, King Street Enterprises, LLC, filed a cash bond which discharges the lien against the property and replaces the property with the bond.

In accordance with Rule 11 (SCRCP), I affirm that I have communicated with opposing counsel and have attempted in good faith to resolve the matter contained in this Motion.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

PEDERSEN & SCOTT, P.C.

A handwritten signature in black ink, appearing to read "William A. Scott", is 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 24th day of June, 2019

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.,

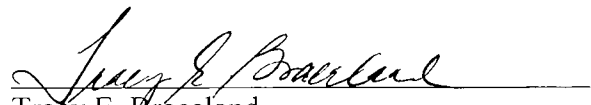
Defendants.

FILED
2019 JUN 26 AM 11:52
JULIE J. ARMSTRONG
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 LEAVE TO FILE AMENDED COMPLAINT 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 this 24th day of March, 2019

PEDERSEN & SCOTT, P.C.
ATTORNEYS AT LAW

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

June 24, 2019

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

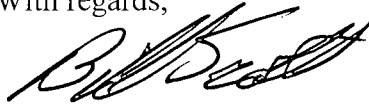
RE: K-Con, Inc. v. King Street Enterprises, LLC and Ohio Imaging Associates, Inc.
C.A. No. 2018-CP-10-3825

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 Leave to File Amended Complaint, 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/encs.)
Brent S. Halversen, Esq. (w/encs.)