

STATE OF SOUTH CAROLINA

OFFICE OF THE REGISTER OF DEEDS

COUNTY OF YORK

Bonitz, Inc.,
S. C. Contractors License #G12175

Plaintiff,

vs.

Piedmont Construction Consultants, LLC,
P&D Land Holdings, LLC, and Bank of
America, N.A.,

Defendants.

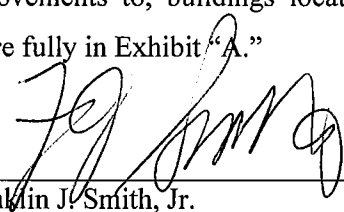
**STATEMENT AND NOTICE
OF MECHANIC'S LIEN**

PLEASE TAKE NOTICE that the Plaintiff herein claims a Mechanic's Lien on the property described in the exhibit attached hereto as Exhibit "A," in the amount of Twenty-Five Thousand, Two Hundred Eighty-Five and 41/100 (\$25,285.41) Dollars by reason of certain labor, materials and/or services furnished by Plaintiff to Piedmont Construction Consultants, LLC for the construction of, or improvements to, the Goddard School upon the premises hereinafter described.

Plaintiff furnished materials and labor pursuant to an agreement with Piedmont Construction Consultants, LLC, with the knowledge and consent of P&D Land Holdings, LLC and Bank of America, N.A., for the improvement of the premises hereinafter described, and the said materials and labor were last supplied to Piedmont Construction Consultants, LLC for use upon the premises within ninety (90) days of the date hereof.

The Statement of Account attached hereto as Exhibit "B" is a true and accurate statement of the amounts currently owed to Plaintiff for the materials and labor furnished to Piedmont Construction Consultants, LLC for use in the construction of, or improvements to, buildings located on the real property owned by P&D Land Holdings, LLC, described more fully in Exhibit "A."

Plaintiff's Contractor License No. is G12175.


Franklin J. Smith, Jr.
Richardson Plowden & Robinson, P.A.
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
ATTORNEY FOR PLAINTIFF

SWORN to before me this
10th day of May, 2019

 (L.S.)

Name: Carol D. Howes

Notary Public for South Carolina

My Commission Expires: 6/24/2025

YORK COUNTY, SC	
2019021279	MECHANICS LIEN
RECORDING FEES	\$12.00
STATE TAX	\$0.00
COUNTY TAX	\$0.00
05-31-2019	02:29:14 PM
BK:LIENS 472	PG:163-168

All that certain piece, parcel or lot of land lying, being and situate on the northwestern side of Clouds Way in the City of Rock Hill, York County, South Carolina, and being shown and designated as 2.47 acres on Plat of Survey for CTR REIT of Rock Hill, LLC, prepared by Edward R. Phelps, SCPLS of Keck & Wood, Inc., dated February 29, 2012, and recorded in Plat Book E148, at Page 9, in the Office of the Clerk of Court for York County, South Carolina, and being more particularly described according to said plat, as follows:

BEGINNING at a 5/8" rebar set on the northwestern side of the right-of-way of Clouds Way at the intersection with Arden Lane, and being located at the joint front corner of within described lot and property of Millwood Plantation Dev., Inc., and running thence along the line dividing said properties, N 42 16 43 W 324.99 feet to a 5/8" rebar set; thence turning and running N 47 43 17 E 331.26 feet to a 5/8" rebar set; thence turning and running S 42 15 19 E 324.99 feet to a 5/8" rebar found on the northwestern edge of the right-of-way of Clouds Way; thence turning and running along the northwestern edge of said right-of-way S 47 43 17 W 331.13 feet to the point of beginning.

TMS # 594-09-06-290

Exhibit "A"

STATEMENT OF ACCOUNT

Bonitz, Inc.
P.O. Box 82
Columbia, SC 29202

RE: Goddard School
415 Clouds Way
Rock Hill, SC 29732

For materials supplied to Piedmont Construction Consultants, LLC for the above project.

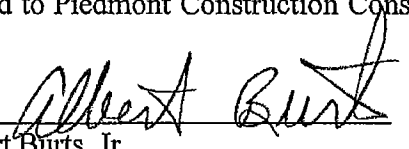
Total Due \$25,285.41

Plus such costs and attorneys' fees as may be established by the Court.

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

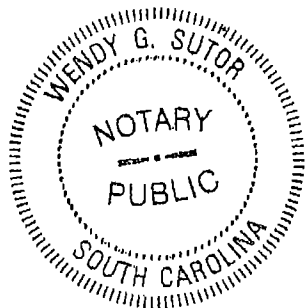
AFFIDAVIT

PERSONALLY appeared before me, Albert Burts, Jr., who being duly sworn, deposes and says: that he is the Manager - Financial Services for Bonitz, Inc., and has personal knowledge of the matters set forth heretofore; that the above is a just and true account of the monies owed to Bonitz, Inc. for materials supplied to Piedmont Construction Consultants, LLC. for the above project.


Albert Burts, Jr.

S.C. Contractors License #G12175

Sworn to before me this 16th
day of May, 2019
Wendy G. Sutor (L.S.)
Name: Wendy G. Sutor
Notary Public for South Carolina
My Commission Expires: 2-14-2028



AFFIDAVIT OF SERVICE

Case:	Court: In the Office of the Register of Deeds	County: York, SC	Job: 3383807
Plaintiff / Petitioner: Bonitz, Inc., S.C. Contractors License #G12175		Defendant / Respondent: Piedmont Construction Consultants, LLC, P&D Land Holdings, LLC, and Bank of America, N.A.	
Received by: Whitesell Investigative Services Inc		For: Swsprocess	
To be served upon: Piedmont Construction Consultants, LLC c/o Kyle Hobbs, Esquire, Registered Agent		Court Date:	

I, Entre Ervin, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Piedmont Construction Consultants, LLC c/o Kyle Hobbs, Esquire, Registered Agent, 106 Confederate St, Fort Mill, SC 29715

Manner of Service: Business, May 22, 2019, 12:14 pm EDT


Documents: Statement of Notice of Mechanic's Lien; Exhibit A (Received May 17, 2019 at 1:15pm EDT)

Additional Comments:

1) Unsuccessful Attempt: May 22, 2019, 10:37 am EDT at 106 Confederate St, Fort Mill, SC 29715
Attempted service at the address provided. The office building is currently closed. Left a voicemail for Mr. Hobbs.

2) Successful Attempt: May 22, 2019, 12:14 pm EDT at 106 Confederate St, Fort Mill, SC 29715 received by Piedmont Construction Consultants, LLC c/o Kyle Hobbs, Esquire, Registered Agent. Age: 34; Ethnicity: Caucasian; Gender: Male; Weight: 250; Height: 6'1"; Hair: Blond; Eyes: Blue;

Made contact with Kyle Hobbs. He identified himself and accepted service without incident.


Entre Ervin
Date 5/23/2019

Whitesell Investigative Services Inc.
PO Box 2511
Rock Hill, SC 29732
803-327-6974

Subscribed and sworn to before me by the affiant who is personally known to me.


Notary Public
5-23-19 7-5-2028
Date Commission Expires

CRYSTAL L. JORDAN
Notary Public, State of South Carolina
My Commission Expires 7/5/2028

AFFIDAVIT OF SERVICE

Case:	Court: In the Office of the Register of Deeds	County: York, SC	Job: 3383809
Plaintiff / Petitioner: Bonitz, Inc., S.C. Contractors License #G12175		Defendant / Respondent: Piedmont Construction Consultants, LLC, P&D Land Holdings, LLC, and Bank of America, N.A.	
Received by: Whitesell Investigative Services Inc		For: Swsprocess	
To be served upon: P&D Land Holdings, LLC c/o David A. Sturgill, Registered Agent		Court Date:	

I, Entre Ervin, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: P&D Land Holdings, LLC c/o David A. Sturgill, Registered Agent , 1989 Landry Ln, Rock Hill, SC 29732

Manner of Service: Business, May 22, 2019, 7:50 pm EDT

Documents: Statement of Notice of Mechanic's Lien; Exhibit A (Received May 17, 2019 at 1:15pm EDT)

Additional Comments:

1) Unsuccessful Attempt: May 20, 2019, 2:25 pm EDT at 1989 Landry Ln, Rock Hill, SC 29732

Attempted service at the address provided; no answer. No vehicles present. No sound or movement from inside. A neighbor came over and stated the Defendant was not currently home.

2) Successful Attempt: May 22, 2019, 7:50 pm EDT at 1989 Landry Ln, Rock Hill, SC 29732 received by P&D Land Holdings, LLC c/o David A. Sturgill, Registered Agent . Age: 60; Ethnicity: Caucasian; Gender: Male; Weight: 260; Height: 5'11"; Hair: White; Eyes: Blue; Made contact with David Sturgill who identified himself and accepted service without incident.

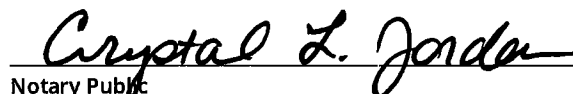


Entre Ervin

5/23/2019
Date

Whitesell Investigative Services Inc.
PO Box 2511
Rock Hill, SC 29732
803-327-6974

Subscribed and sworn to before me by the affiant who is personally known to me.



Notary Public

5-23-19

Date

7-5-2028

Commission Expires

CRYSTAL L. JORDAN
Notary Public, State of South Carolina
My Commission Expires 7/5/2028

STATE OF SOUTH CAROLINA

COUNTY OF YORK

Bonitz Contractors license G12175
PLAINTIFF,

vs.

Piedmont Construction Consultants, LLC, et al

DEFENDANT(S).

IN THE COURT OF COMMON PLEAS

C/A NO: T/M NO: 594-09-06-290

AFFIDAVIT OF SERVICE

1752-280

Service of Process on: BANK OF AMERICA, N.A.

The undersigned, being first duly sworn, on oath deposes and states: That s(he) is now and at all times herein mentioned a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, has the authority to serve pleadings in the State named above, and is competent to be a witness therein.

Documents Served:

- | | | | |
|---|--|--|---|
| <input type="checkbox"/> Civil Action Coversheet | <input type="checkbox"/> LP | <input type="checkbox"/> Summons and Complaint | <input type="checkbox"/> Order Permitting |
| <input type="checkbox"/> Amended LP | <input type="checkbox"/> Amended Summons & Complaint | <input type="checkbox"/> Order Joining | |
| <input type="checkbox"/> Notice to Appoint | <input type="checkbox"/> Amended Notice of F/C Intervention | <input type="checkbox"/> Rule To Show Cause | |
| <input type="checkbox"/> Notice of F/C Intervention | <input type="checkbox"/> Certification from Exemption From ADR | <input checked="" type="checkbox"/> NOTICE of Mechanic's Lien | |

This affiant served the above-described documents at 440 KNOX ABBOT DRIVE, CAYCE SC 29033 on the 20TH day of May, 2019 at 1:15 PM by delivering 1 copies of same to:

☐ **INDIVIDUAL SERVICE:** ☐ **MET DEFENDANT AT**

☐ **SUBSTITUTE SERVICE** by leaving a copy of the above-described documents at his/her usual place of abode with (relationship/paralegal): _____ a person residing therein of suitable age and discretion who confirmed the Defendant resides at the above address and informed that person of the contents thereof.

☒ **CORPORATE OR GOVERNMENT SERVICE** by leaving a copy of this process with JANELLA LANDOLFI (Title) MANAGER WITH BANK OF AMERICA, NA, a person authorized to accept service and informed that the person of the contents thereof.

MILITARY No

MARRIED —

HOUSE —

OWNER OCCUPIED: —

MOBILE HOME: —

MOBILE HOME PICTURES E-MAILED —

PROPERTY ADDRESS: _____

COMMENTS:

THE DESCRIPTION OF THE PERSON WITH WHOM THE COPY OF THIS PROCESS WAS LEFT IS AS FOLLOWS:
Age 40'S Gender Female Race W Height 5'4 Weight 165 Hair BROWN Glasses NO

Signature of Process Server: The undersigned declares, under penalty of perjury, that the foregoing is true and correct and that he/she is over the age of 18 and is not interested party in this action.

NAME: Ellen Crolley

Print

Signature

05-30-2019

Date

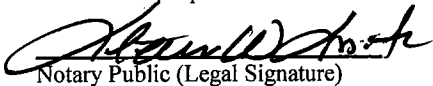
Notary Public: Subscribed and sworn before me on this 30TH day of May in the year of 2019

Personally known to me ☒ or ☐ identified by the following document:

Notary Public for SOUTH CAROLINA

Commission Expiration: 11-4-2026

Type: _____


Notary Public (Legal Signature)