

**RECEIVED**  
DATE 10/28/24

JUDICIAL MERIT SELECTION COMMISSION )

In the Matter of: **Judge Michelle Hurley** )  
**Candidate for 5<sup>th</sup> Judicial Circuit Seat 2 Family Court** )

JUDICIAL MERIT SELECTION )  
P. O. BOX )  
COLUMBIA, SC )  
WITNESS AFFIDAVIT )  
FORM )



In regard to my intended testimony, I will offer information as to the following:

(1) **My name is Rhonda Lewis Meisner Post Office I am 59 years old my address for work is PO Box 689 my home address is Blythewood, SC** *Redacted*

(2) The other persons who have knowledge of the facts concerning my testimony are as follows:

**court reporters assigned to the hearings**  
**my former attorney Brett Stevens 1811 Bull Street Columbia SC 29201 803-587-8506 who requested reconsideration of the egregious First Temporary Order.**  
**Brenton Burry , Assistant Director of SC Supreme Court Commission on CLE 950 Taylor Street suite 120 Columbia, SC 29201** *Redacted*

**Sheila Robinson, I** *Redacted*  
**April Gremillion, I** *Redacted*  
**Dick Whiting** *Redacted*

**Virginia Mullikin Mullikin Law firm PO Box 1378 Camden SC 29201 (803)425-**  
*Redacted*

The witnesses with the star beside their name are the beneficiaries of Judge Hurley's rulings. I am not putting this affidavit or testimony in the record for any purposes other than to help the legislature make a determination of whether Judge Hurley should be reappointed. I do not believe based on my experiences in the family court that any of the judges should be reappointed and there should be a fresh start for the Richland County Family Court so that the community can heal and regain confidence in the system. I contend upon information and belief, Judge Hurley did not follow the statutes, precedential laws, and instructions from this honorable legislature regarding custody, visitation, spousal support, equitable distribution and the Guardian *ad Litem* statutes and along with its appointment instructions. It is my testimony that Judge Hurley did not treat me fairly in the following particulars:

(a) **specific facts relating to the candidate's**  
**1.character, As I understand Judicial Character, this relates to** Qualities that judges should exhibit in judicial proceedings, such as patience, dignity, fairness, impartiality, and honesty in decision making. **I will address the**

**fairness, impartiality, and honesty in decision making.** I was disappointed to find Judge Hurley to not be impartial, she is not fair, and she was not honest in her decision making. It is my testimony that instead of listening to the parties and reviewing their submitted evidence, affidavits and other evidence and applying the law, I observed her make rulings based on the attorney's arguments instead of reviewing the evidence and then applying South Carolina law.

**Issue # 1 Judge Hurley heard the case for the first time and issued the most egregious of the Temporary Orders in that she required supervised visitation based on false allegations, failed to Order spousal support despite a disparity of 10 to 1 financial advantage; failed to allow my profoundly gifted children to attend a camp at Harvard for which they applied and were accepted and gave me less than 1 hour per year of marriage to vacate my home of 26 years. She allowed the Guardian ad Litem to violate her Order and failed to follow up on her own order. She ordered me to get drug and alcohol tests but did not order my ex-husband who was at the time an anesthesiologist to have any tests. on and submit a written report within 30 days.**

I was served with the divorce papers less than 24 hours and went forward with the hearing because I was unaware of the fraud rampant in the family court and had an expectation of equality and fairness. I arrived at the hearing with multiple witnesses despite the short notice including my mother, Sherry Davis, a cardiologist that was a neighbor Dr. CW Hendricks all to testify on my behalf. Nevertheless despite the fact my husband having a 10:1 advantage financially and me not having an attorney she took my children away from me because she required supervised visits that I could not pay for. She failed to order spousal support despite South Carolina law requiring spouses to support each other and we were married at the time. She gave my red suburban to my husband and she required me to take tests despite his job as an anesthesiologist provided unfettered access to drugs and he was subsequently accused of providing drugs to a romantic interest that was the reason for the separation of the marriage. She denied my children a trip to Harvard and MIT despite the fact that I offered to not go and allow my mother to take the children.

**Judge Hurley's Order appointing the GAL, April Gremillion required her to complete an expedited investigation and submit a written report within 30 days.** Ms. Gremillion violated this court order. Judge Hurley was incompetent because she failed to monitor and supervise an appointee that she appointed as required by statute. The GAL's failure to follow her order should have subjected her to incarceration or at least a rebuke from the Judge that appointed her. There is no such monitoring or admonition in the record that I am aware of. The GAL's fees were awarded despite violating Judge Hurley's court order. This GAL admitted taking time off during this 30 day period to work on another case and stated she was sick for part of the time. I believe Judge Hurley's failure to monitor her appointed GAL reflects either a lapse in judgment or a failure to rule fairly

because she should make sure an order that is only 30 days away was followed which goes to her competency because my attorney Brett Stevens requested reconsideration of her First Temporary Order that failed to treat the parties fairly, equitably and failed to follow South Carolina Statutory law as it relates to maintaining the status quo. I believe the GAL statute requires supervision of officers of the Court; however, Judge Hurley failed me and my children by failing to act equitably in this matter.

**Issue # 2 Failure to hold a hearing on my request to change custody despite the children were exhibiting symptoms of extreme issues with custody including suspensions, expulsions, failing and almost failing grades. I will note that a hearing for the installation for Judge Vinson at the Statehouse was occurring on that day. I am unaware of whether she attended that service instead of performing her duties; however, I believe this question should be addressed. I have submitted the Order for that day.**

**ISSUE # 3 Judge Hurley held a hearing on motions for the DSS cases. I was informed by the family court that the hearing was cancelled; however, because I received information from my husband that the children were scheduled to have a dental appointment, I realized the hearing must not have been cancelled because otherwise he would not have informed me of the dental appointment. This was one of the first confirmations that the corruption in the family court is so widespread.**

I did not order the transcript for this hearing; however, I put this fact on the record because my plan was to go to the courthouse and see if the hearing was on the schedule. It was. AS such, it was one of my first confirmations that pre-determined outcomes were part and parcel of the family court orders. I did not recall the outcome of this hearing; however, I most likely lost but the important point is that I determined there were *ex parte* communications and decisions made outside of the courtroom.

**Issue # 4 Judge Hurley presided over my DSS trial where I was found innocent.**

When it was clear that multiple witnesses testified on my behalf that I did not abuse anyone. In fact, the police officer said that he was unsure any abuse had occurred so he did not intervene to take anyone into custody. What happened that night was an unintentional injury when my child while wearing a mask pointed a toy cowboy rifle at my head and pretended to shoot me, making loud automatic weapon sounds. I took the gun from him and in the process of removing his mask he fell against the alarm system and made one single red mark. By statute this is not abuse, it was an accident. Nevertheless, because my husband at the time was reporting hallucinations including wild dogs and a man on the porch etc he reported that I abused my child. Prior to me presenting my case, Judge Hurley stopped the proceeding and requested that I come back behind the court. She said that she was ruling that I was not guilty but that if I continued, I *could be found guilty*. She hugged me twice and apologized that I had to go through this. I perceived her comments that I could be found guilty as a threat from Judge Hurley to not continue presenting my case. It is my opinion, Judge Hurley was attempting to prevent me from putting

damaging information in the file such as when I reported to the Court that my child told me Dad said you were going to be put on Central Registry so I cannot have an Easter Egg hunt because my friends will be embarrassed once they learn I cannot host the event because I am on the Central Registry or words to this effect. While I appreciate the hugs from Judge Hurley, I do not appreciate the fact that after she found me innocent she did not return my children, she did not order spousal support or other equitable tenets. I believe these facts indicate Judge Hurley is not competent because she should have immediately given my children back to me, but instead she just recused herself and refused to make things right other than give me two hugs. Again, I appreciate the hugs, but would have rather had the years lost with my children. Additionally, I did not find out until the final hearing, but Judge Hurley made the confidential DSS hearing available on her virtual courtroom and upon information and belief, my husband's attorney attended because I reviewed the billing at the final hearing. I believe the fact the case was broadcast without informing me gave my husband an advantage in the final hearing.

## **2.competency**

**I believe the above facts adequate call into question Judge Hurley's competency because she failed to maintain the status quo as near as possible during the pendency of the litigation by ordering spousal support, damaged my children by her rulings that kept them from their mother and prevented them from attending a camp at Harvard they spent many hours applying to attend and their father paid the month before we entered family Court.**

## **3.ethics including any and all allegations of wrongdoing or misconduct on the part of the candidate**

**I think it was unethical to have found me innocent of abuse and to not return my children to me. They are now attempting to heal from the separation from their mother.**

- (b) specific dates, places, and times at which or during which such allegations took place; The dates and times are reflected in the transcripts, Orders, emails, communications etc. submitted in support the other dates will be recited in my oral testimony that are not submitted in this affidavit.
- (c) names of any persons present during such alleged actions or possessing evidence the names are submitted above; however, there were citizens in some of the hearings that may not be noted above.

The witnesses listed on the witness list

Virginia Mulliken of the Mulliken Law firm went with the complainant behind the court at the DSS hearing.

- (d) how this information relates to the qualifications of the judicial candidate.

Judges have tremendous power that if not exercised properly deprives children of their parents and the parents of their children. South Carolina law requires that spouses support each other. The obligation to support each other does not end until the marriage ends yet the Richland County Family court Judges including Judge Hurley allows parties to avoid their marital

obligations by corrupt rulings. Temporary Support under South Carolina statutory law is required because judges are charged with keeping the status quo during the pendency of the litigation, but the Judges avoid their obligation to perform their jobs impartially in favor of the most favored law firm. I believe this to be more dangerous to our society than any criminal because the law is violated but orders submitted are presumably valid.

- (4) Set forth a list of and provide a copy of any and all documents to be produced at the hearing which relate to your testimony regarding the qualifications of the judicial candidate.

Transcript of the July 18, 2019 hearing

Orders associated with the case

By reference the complaint against Monet Pincus and M. Scott Rankin

- (5) State any other facts you feel are pertinent to the screening of this judicial candidate.

I think Judge Hurley should continued to be monitored for fairness if she is approved for re-election.

I understand that the information I have provided herein is confidential and is not to be disclosed to anyone except the Judicial Merit Selection Commission, the candidate, and counsel.

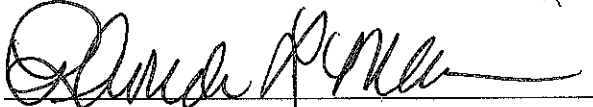
## **WAIVER**

I further understand that my testimony before the Judicial Merit Selection Commission may require the disclosure of information that would otherwise be protected by the attorney-client privilege. Therefore, in order that my complaint may be fully investigated by the Commission,


I hereby waive any right that I may have to raise the attorney-client privilege as that privilege may relate to the subject of my complaint. I further understand that by waiving the attorney-client privilege for this matter, I am authorizing the Commission to question other parties, including my attorney, concerning the facts and issues of my case.

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Signature

Sworn to me this 26<sup>th</sup> day of Oct, 2024

  
Notary Public of South Carolina L.S.

My commission expires: 9/28/2028

 **Hunter Glisson**  
Notary Public for South Carolina  
Commission Expires: 09/28/2028

*Rhonda Lewis Meisner*  
Post Office Box 689  
Blythewood, South Carolina 29016  
scorequipment@gmail.com  
(803)206-3402

Virginia Ann Mullikin  
Mullikin Law Firm  
Post Office Box 1378  
Camden, South Carolina 29021

VIA EMAIL AT: [Virginia.mullikin@dss.sc.gov](mailto:Virginia.mullikin@dss.sc.gov)

Re: 2020-0345 South Carolina Department of Social Services v. Rhonda Meisner

Dear Ms. Mullikin,

This letter is to inform you of the Defendant's updated witness list for the continuation of the trial to be held on June 7th, and 8th, 2021 and to provide copies of Subpoenas that will be served either later today or tomorrow that include subpoenas for Shawnee Davis, Janice Phillips, Billie Wofford, along with the DSS witness subpoenas that I am serving via email as agreed to by Maggie Meekins.

**DEFENDANT'S WITNESS LIST WITH BRIEF DESCRIPTION OF TESTIMONY**

1. Rochelle Williams-DSS Supervisor Ms. Williams will be asked questions regarding this case as it relates to her involvement and as to the DSS policies and procedures regarding investigations. *Subpoena attached*
2. Shantell Warren- Ms. Warren will be asked questions regarding this case as it relates to her involvement and as to the DSS policies and procedures regarding investigations. *Subpoena attached*
3. Terri Thompson-Director-Richland County DSS Ms. Thompson will be asked questions regarding this case as it relates to her involvement and as to the DSS policies and procedures regarding investigations. *Subpoena attached*
4. Diamond Colon- will be asked questions regarding this case as it relates to her involvement and as to the DSS policies and procedures regarding investigations. *Subpoena attached.*
5. Kathy Allen R.N.-Ms. Allen will testify as to the Defendant's interactions with her related to her children while she served in the capacity of school nurse at Bethel Hanberry Elementary School. *Subpoena sent 5/14/2021*
6. Markie Burnette a/k/a Markie Smith Ms. Burnette will be asked about her conversations with the children's father as it relates to his representations about discipline and the children. *Subpoena sent 5/16/2021 confirmed receipt via cell phone call.*

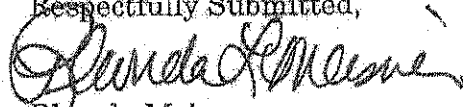
7. Courtney Lehr Ms. Lehr will be asked about her relationship to the family and interactions with the father. She will be asked about her conversation with the Grant Meisner. *Subpoena sent 5/14 confirmed receipt*
8. Shawnee Davis Ms. Davis will testify as to her interactions with the Defendant when she served as a supervisor. Specifically, the youngest child's interactions with his mother, the Defendant. *Subpoena sent 5/24*
9. Billie Wofford Ms. Wofford will testify as to her interactions with the Defendant when she served as a supervisor. Specifically, the youngest child's interactions with his mother, the Defendant. *Subpoena sent 5/24*
10. Janice Phillips will testify as to her interactions with the Defendant when she served as a supervisor. Specifically, the youngest child's interactions with his mother, the Defendant. *Subpoena sent 5/24*
11. Sherry Davis Ms. Davis will testify as to the interactions with the Defendant and her children and the children and their father. Ms. Davis will testify to the events surrounding the search for the Defendant's oldest child, who committed suicide with the father's unsecured hand gun and her perceptions of the events surrounding the search for the child when he was missing. *NO Subpoena*
12. Brittany McGuire Ms. McGuire is the adult cousin of the children and will discuss her perceptions of the Defendant and the Defendant's interactions with the children on family vacations and visits. *NO subpoena sent*
13. Amanda Dewrell Ms. Dewrell is the adult cousin of the children and will discuss her perceptions of the Defendant and the Defendant's interactions with the children on family vacations and visits. *no subpoena sent*
14. Edna Burdette Ms. Burdette is the maternal grandmother, who is a former Richland School District Two bus driver and has direct knowledge about the Defendant's interactions with the children, her grandchildren. *no Subpoena*
15. *Lindsay Agostini - School board member Richland Two if time allows no subpoena sent*

Additionally, included in this email are the following attachments which will be used in the trial.

1. 2019 CPPS policy and procedure manual
2. Transcript of the divorce hearing trial.
3. Copy of the previous information submitted prior to hearing.
4. Subpoenas issued to: Terri Thompson, Diamond Colon, Shantell Warren,, Rochelle Williams.

Please call if you have questions.

*May 24, 2021*

Respectfully Submitted,  
  
 Rhonda Meisner  
 (803)206-3402



STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 Grant Meisner, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Rhonda Meisner )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

IN THE FAMILY COURT OF THE  
 FIFTH JUDICIAL CIRCUIT

Docket No: 19-DR-40-2277

**ORDER  
 DENYING DEFENDANT'S NOVEMBER, 19, 2020  
 MOTION TO CHANGE CUSTODY  
 AND OTHER RELIEF**

DATE OF HEARING: February 3, 2021  
 HEARING JUDGE: Michelle Hurley  
 PLAINTIFF'S COUNSEL: Sheila Robinson  
 DEFENDANT: Self-Represented  
 GUARDIAN *ad LITEM*: Richard Whiting  
 COURT REPORTER: DeeAnne Varndae

RICHLAND COUNTY  
 FILED  
 2021 FEB 11 PM 1:51  
 JEANNETTE W. MCGRIDE  
 C.C.P. CLERK, 5th J.C.

This matter came before the Court in Defendant's November 19, 2020 *Notice of Motion and Motion for Emergency/Expedited Hearing*. Judge Frierson Smith denied Defendant's request for an emergency or expedited hearing; therefore the matter was scheduled for a temporary hearing on February 3, 2021. Appearances were as listed above. Defendant seeks a change in custody of the parties' minor children, or in the alternative a regular visitation schedule, a protective order, and to compel compliance with discovery<sup>1</sup>. On February 2, 2021 Defendant filed a large temporary hearing packet for the Court's review. On the same day, Plaintiff filed a *Return to Defendant's Motion for Change of Custody* and his temporary hearing packet. The Guardian *ad Litem* also filed an interim report.

At the call of the case, the Court informed the parties that it had reviewed and considered the motion, the return, the GAL's report and all of the corroborating documents submitted for this hearing, and that Defendant's motion was denied *in toto*.

After ruling, Defendant argued that in denying her motion without oral argument, the Court had violated her due process rights. Pursuant to SCRFC, Rule 21, "[E]vidence received by the court at temporary hearings shall be confined to pleadings, affidavits, and financial declarations unless good cause is shown to the court why additional evidence or testimony may be necessary".

*MAH*

In addition to Defendant's motion that had attached her affidavit, text messages and public index records, Defendant submitted a 2" thick packet, containing roughly 250 pages of documents for the Courts review and consideration, which the Court reviewed and considered. Based on the comprehensive and extensive amount of information provided to the Court by the parties and the GAL, the Court determined that there was no "good cause" for the Court to hear additional argument or take testimony.

**AND, IT IS SO ORDERED.**

February 11, 2021  
Columbia, South Carolina

  
\_\_\_\_\_  
Michelle M. Hurley  
Judge, Fifth Circuit Family Court

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<sup>1</sup> Plaintiff does not seek to compel compliance with a Discovery order, but seeks to delay trial and extend time to complete Discovery.

*MMH 2/2*

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 Grant Meisner, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Rhonda Meisner, )  
 )  
 Defendant. )

IN THE FAMILY COURT  
 FIFTH JUDICIAL CIRCUIT

DOCKET NO. 2019-DR-40-2277

**AFFIDAVIT OF ATTORNEY'S FEES**

Comes now, Brett L. Stevens, the former attorney for Defendant in this matter, who being first sworn states as follows:

1. The charges incurred in this matter on behalf of Rhonda Meisner are set forth in the attached billing records which can be summarized as follows:

**TOTALS:**

**2019-DR 40-2277 (Divorce Action)**

Billed Time:	\$6,597.50 (49.3 hours)
Costs:	\$182.05
Total:	\$6779.55

- **Amount unpaid as of 11/3/2022: \$2528.15**
2. Attorney time in this case was charged at \$150.00 per hour which is lower than the fee normally charged in the area for similar services;
  3. I believe all actions taken on behalf of Defendant were reasonable and necessary in the course of litigation;
  4. I have been licensed to practice law in South Carolina since 2006;
  5. I have almost exclusively practiced family law since I opened my own practice in August of 2016;
  6. I have a J.D. from the University of South Carolina (2006); a Master's Degree in English from Clemson University (2001); and a Bachelor's Degree in English and Theatre from Presbyterian College (1999);
  7. This was a difficult case in that it was very litigious, a DSS case was initiated, and an emergency hearing was held at the initiation of this case;

8. I represented Ms. Meisner until she could no longer finance litigation;
9. Further, deponent sayeth naught.

---


Brett L. Stevens, S.C. Bar No. 73830  
Stevens Law, LLC  
1822 Bull Street  
Columbia, South Carolina 29201  
T: (803) 587-8506  
E: Brett@BrettStevensLaw.com

Sworn to and Subscribed before me  
This \_\_\_\_\_ day of \_\_\_\_\_, 2022

\_\_\_\_\_  
Notary Public for South Carolina

Printed Name of Notary: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

 Outlook

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Re: Emergency hearing tomorrow-

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From Brett Stevens <brett@brettstevenslaw.com>

Date Tue 4/28/2020 8:37 AM

To Rhonda Meisner <scorequipment@gmail.com>

That's fine, Rhonda. Please use whatever I have given you in support of your case. I have your case file as well. Let me know if you want to come pick it up or if you need anything out of it.

I hope you are well!  
Brett

On Tue, Apr 28, 2020 at 11:19 AM Rhonda Meisner <[scorequipment@gmail.com](mailto:scorequipment@gmail.com)> wrote:

Good afternoon Brett,

We have an emergency hearing scheduled tomorrow and if you approve, I would like to use the alimony and child support calculator you gave me earlier this year. Please let me know.

Warm regards,

Rhonda Meisner, South Carolina Sales Manager

South Carolina Operating Room Equipment, LLC

Post Office Box 689

Blythewood, S.C. 29016

(803)333-9900

(803)206-3402

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Brett L. Stevens  
Stevens Law, LLC  
1822 Bull Street  
Columbia, SC 29201  
(803) 587-8506  
[brettstevenslaw.com](http://brettstevenslaw.com)

--CORONAVIRUS NOTICE--

Please be advised that I am working reduced hours from home during this time. Thank you for your patience. I will respond to emails and set conference calls as I am able.

-- CONFIDENTIALITY NOTICE --

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# Alimony Calculator

Prepared By: Brett L. Stevens

**Alimony = 8,894**

**Child Support = 1,178**

	Husband	Wife
<b><u>Tax Information</u></b>		
Monthly Income:	26,500	1,584
Annual Gross Income:	318,000	19,008
Filing Status:	Single	Single
<b><u>Child Support Information</u></b>		
Number of Children:	3	
Health Insurance:		
Extraordinary Medicals:		
Pre-Tax Child Care		
Prior Support:		
Additional Dependents:		
<b><u>Other Obligations</u></b>		
Payroll Deductions:		
Other Obligations:		
<b><u>Results</u></b>		
<b>Alimony:</b>	<b>-8,894</b>	<b>8,894</b>
<b>Child Support:</b>	<b>1,178</b>	<b>-1,178</b>

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<b>Disposable Income:</b>	<b>9,111</b>	<b>9,112</b>
<b>Net Alimony Cost/Benefit:</b>	<b>-7,894</b>	<b>7,894</b>

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<u>Payments</u>	<u>Base</u>	<u>+ 5% Costs</u>
<b>Alimony.....</b>		
Monthly	8,894	9,338.70
Semimonthly	4,447	4,669.35
Biweekly	4,105	4,310.17
Weekly	2,052	2,155.08
<b>Child Support.....</b>		
Monthly	1,178	1,236.90
Semimonthly	589	618.45
Biweekly	544	570.88
Weekly	272	285.44

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	Husband	Wife
<b><u>Disposable Income Calculations</u></b>		
Monthly Income:	26,500	1,584
Federal Taxes:	-6,844	-57
State Taxes:	-1,670	-10
FICA/Medicare:	-1,159	-121
Other Payroll Deductions:		
Other Obligations:		
<b><u>Prior Support:</u></b>		
Net Monthly Income:	16,827	1,396
After-Tax Alimony:	-8,894	8,894
Child Support:	1,178	-1,178
<b><u>Other Support Items:</u></b>		
Net Disposable Income:	9,111	9,112
<b><u>Tax Calculations</u></b>		
Gross Income:	318,000	19,008
Deductions:	-12,200	-12,200
Taxable Income (without alimony):	305,800	6,808
Federal Taxes (without alimony):	82,124	681
State Taxes (without alimony):	20,038	124
Taxable Income (with alimony):	305,800	6,808
Federal Taxes (with alimony):	82,124	681

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State Taxes (with alimony):	20,038	124
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**After-Tax Alimony Calculation**

Fed. Taxes w/o Alimony Adjustment:	82,124	681
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State Taxes w/o Alimony Adjustment:	20,038	124
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Total Taxes w/o Alimony Adjustment:	102,162	805
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Fed. Taxes with Alimony Adjustment:	82,124	681
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State Taxes with Alimony Adjustment:	20,038	124
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Total Taxes with Alimony Adjustment:	102,162	805
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Difference in Annual Taxes:

Difference in Monthly Taxes:

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	Husband	Wife
<b><u>Net Cost/Benefit of The Alimony</u></b>		
Alimony:	8,894	8,894
Difference in Taxes:		
Difference in Child Support	-1,000	-1,000
-----		
Net Cost/Benefit of Alimony	-7,894	7,894
 <b><u>Child Support - Worksheet A</u></b>		
Monthly Income:	26,500	1,584
Alimony:	-8,894	8,894
-----		
Other Support Obligations:		
Add. Dependents Deduction:	[0]	[0]
Net Monthly Income:		
Total Income:	28,084	
-----		
Health Insurance:		
Extraord. Med. Exp.:		
Child Care:	[]	[]
Total Adjustments:		
-----		
Basic Support from Tables:	3,157	
Total Adjustments:		
Total Support Needed:	3,157	
-----		
Percentage of Total Income:	62.7%	37.3%

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Share of Basic Support:	1,979	1,178
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Other Spt. Adjustments:		
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Monthly Support:	1,979	1,178
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Camden, SC 29021

(803) 425-7228

[mrankinsc@sccourts.org](mailto:mrankinsc@sccourts.org)

**From:** Allison Driggers <[allison.driggers@smithrobinsonlaw.com](mailto:allison.driggers@smithrobinsonlaw.com)>

**Sent:** Friday, September 8, 2023 10:54 AM

**To:** Rankin, Michael S. Secretary (Nichole A. Todd) <[mrankinsc@sccourts.org](mailto:mrankinsc@sccourts.org)>

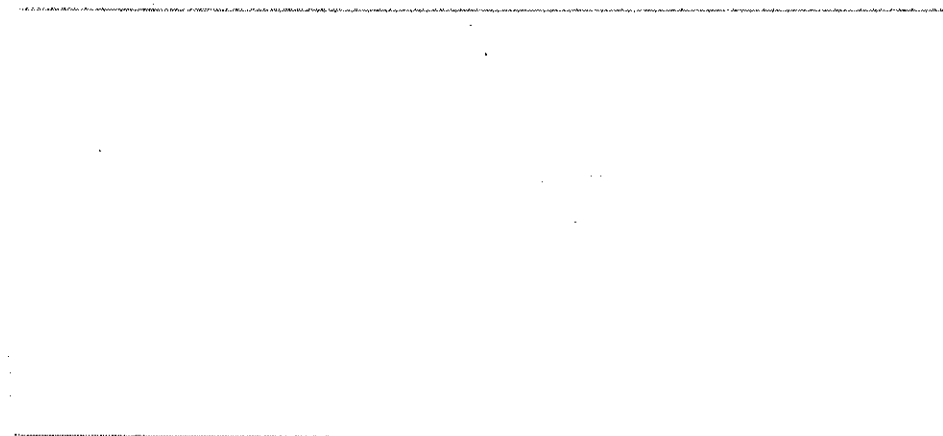
**Cc:** Shanon Peake <[shanonp@smithrobinsonlaw.com](mailto:shanonp@smithrobinsonlaw.com)>; [scorequipment@gmail.com](mailto:scorequipment@gmail.com);  
[sheila@mbmlawsc.com](mailto:sheila@mbmlawsc.com)

**Subject:** Meisner v. Meisner Civil Action No.: 2019-DR-40-02277

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good morning Judge Rankin, I am following up with you regarding the Order in the above referenced case. The attached Order is for the hearing on Defendant Rhonda Meisner's Motion to Compel, which was held on July 12, 2023. Please let me know if I need to file the document through the family court or if there is anything else I need to do.

Thank you,



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RE: RTSC Order instructionstt

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From scorequipment@gmail.com <scorequipment@gmail.com>  
Date Fri 9/24/2021 8:16 AM  
To 'Jones, Gwendlyne Y.' <gjonesj@sccourts.org>; 'Sheila Robinson' <sheila@mttlaw.com>  
Cc dick.whiting@whitinglawsc.com <dick.whiting@whitinglawsc.com>

Good Morning Judge Jones,

The actual dates for the request for spousal support and equitable distribution are as follow:  
July 18, 2019 before the honorable Michelle Hurley  
November 18, 2019 before the Honorable M. Scott Rankin  
April 29, 2020 before the Honorable Rosalyn Frierson-Smith  
October 5, 2020 before the Honorable M. Scott Rankin  
February 3, 2021 before the Honorable Michelle Hurley  
July 20, 2021 before the Honorable M. Scott Rankin  
September 21, 2021 before the Honorable Rosalyn Frierson- Smith

There are no allegations that would preclude spousal support.

Respectfully,  
Rhonda Meisner

---

**From:** Jones, Gwendlyne Y. <gjonesj@sccourts.org>  
**Sent:** Thursday, September 23, 2021 12:52 PM  
**To:** scorequipment@gmail.com; 'Sheila Robinson' <sheila@mttlaw.com>; dick.whiting@whitinglawsc.com  
**Subject:** RE: RTSC Order instructions

All:

In response to Ms. Meisner's email, please clarify the following in the preparation of the order:

- Defendant made several requests for alimony, or advancements toward equitable distribution at previous hearings. All requests were denied. A request for alimony, reduction in child support or advancement toward equitable distribution was not before me.
- The Defendant lists the "loaned amounts" in the *other income* section of her financial declaration.
- The Court's ruling regarding the contempt action remains as ordered. The Defendant has 5 days from the *filing* of my order to comply. Upon the filing of an affidavit from Plaintiff that Defendant has not complied, a bench warrant shall be issued for her arrest.

**Gwendlyne Y. Jones**  
**Family Court Judge**  
**Fifth Judicial Circuit**  
**1701 Main Street Columbia, SC 29201**  
**P.O. Box 192 Columbia, SC 29202**  
**Phone: (803) 576-1760**

Facsimile: (803) 576-1763

[gjonesj@sccourts.org](mailto:gjonesj@sccourts.org)

From: [scorequipment@gmail.com](mailto:scorequipment@gmail.com) <[scorequipment@gmail.com](mailto:scorequipment@gmail.com)>

Sent: Thursday, September 23, 2021 8:55 AM

To: Jones, Gwendlyne Y. <[gjonesj@sccourts.org](mailto:gjonesj@sccourts.org)>; 'Sheila Robinson' <[sheila@mttlaw.com](mailto:sheila@mttlaw.com)>;

[dick.whiting@whitinglawsc.com](mailto:dick.whiting@whitinglawsc.com)

Cc: [scorequipment@gmail.com](mailto:scorequipment@gmail.com)

Subject: RE: RTSC Order instructions

\*\*\* **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Judge Jones,

I am unable to pay these amounts and will be forced to go to jail for six months which will be very detrimental to my children.

I would like to bring your attention to some of the terms of your Order and request you consider delaying these payments until the final hearing.

1. The "loaned amounts" from the companies are noted on the financial declaration under the income section as other income; however, I am personally only receiving \$43.59 monthly from my pension and I am borrowing all of the money that I am using from others including the companies.
2. The memo order also stated that I have not filed for alternative relief; however, I have had multiple motions for Temporary Relief and requested spousal support that would eliminate any payment of child support as an offset to the amount owed, with no relief from the Court. I even requested spousal support and the back due spousal support at the hearing as an affirmative defense to the amounts owed as being premature until final hearing.
3. Additionally, the HOA fees and the mortgage payments are stayed by the filing of the Notice of Appeal and as argued those orders were all appealed.
4. The requirement to sign over the title is not stayed; however, I do not believe that I can comply with that Order in 5 days because it will take more time than that to complete any required process. Upon Information and belief, *My soon to be ex-husband has the title.* I will attempt to get



the replacement title tomorrow, but may not be able to comply within the short 5 day time frame.

**(b) Exceptions.** The exceptions to the general rule are found in statutes, court rules, and case law. Where specific conditions must be met before the exception applies, those conditions must be strictly complied with. A list of some, but not all, of the exceptions to the general rule is:

(1) Money judgments as provided in S.C. Code Ann. § 18-9-130.

(2) Judgments directing the assignment or delivery of documents or personal property as provided in S.C. Code Ann. § 18-9-150.

(3) Judgments directing the execution of conveyances or other instruments as provided in S.C. Code Ann. § 18-9-160.

(4) Judgments directing the sale or delivery of possession of real property as provided in S.C. Code Ann. § 18-9-170.

(5) Judgments directing the sale of perishable property as provided in S.C. Code Ann. § 18-9-220.

(6) Family court orders regarding a child or requiring payment of support for a spouse or child as provided in S.C. Code Ann. § 63-3-630.

(7) Worker's compensation awards as provided in S.C. Code Ann. § 42-17-60.

(8) An appeal from an order granting an injunction or temporary restraining order.

(9) Family court orders awarding temporary suit costs or attorney's fees as provided in S.C. Code Ann. § 63-3-530(A)(2).

(10) Ejectment orders as provided in S.C. Code Ann. § 27-37-130 and S.C. Code Ann. § 27-40-800.

(11) Appeals from administrative tribunals as provided in S.C. Code Ann. § 1-23-380(A)(2) and § 1-23-600 (G)(5).

Respectfully,

Rhonda Meisner

---

From: Jones, Gwendlyne Y. <[gjonesj@sccourts.org](mailto:gjonesj@sccourts.org)>

Sent: Wednesday, September 22, 2021 1:25 PM

To: Sheila Robinson <[sheila@mttlaw.com](mailto:sheila@mttlaw.com)>; Rhonda Meisner <[scorequipment@gmail.com](mailto:scorequipment@gmail.com)>;

'dick.whiting@whitinglawsc.com' <dick.whiting@whitinglawsc.com>

**Subject:** RTSC Order instructions

Attached, please find instructions for the preparation of the order from the hearing held on September 9, 2021.

Sincerely,

**Gwendlyne Y. Jones**  
**Family Court Judge**  
**Fifth Judicial Circuit**  
**1701 Main Street Columbia, SC 29201**  
**P.O. Box 192 Columbia, SC 29202**  
**Phone: (803) 576-1760**  
**Facsimile: (803) 576-1763**

**[gjonesj@sccourts.org](mailto:gjonesj@sccourts.org)**

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STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
GRANT MEISNER, )  
PLAINTIFF, )  
VS. )  
RHONDA MEISNER, )  
DEFENDANT. )

---

IN THE FAMILY COURT OF THE  
FIFTH JUDICIAL CIRCUIT  
C.A. NO.: 2019-DR-40-2277

**AFFIDAVIT IN SUPPORT OF  
ATTORNEY'S FEES FOR PLAINTIFF  
FOR FINAL MERITS HEARING  
( Through July 21, 2023 )**

Personally appeared before me, Sheila McNair Robinson, who, after being duly sworn,  
deposes and states as follows:

1. Affiant is an attorney in private practice and has been retained to represent the legal interests of Plaintiff, GRANT MEISNER, in this action.
2. Affiant's legal practice has always been predominantly domestic, and presently, 100% of her work is domestic.
3. Affiant incorporates herein Rule 23, Rules of the South Carolina Supreme Court, which contains the Canons of Professional Ethics and further calls the attention of the Court to the holdings in Glasscock v. Glasscock, 403 S.E.2d 313 (1991); Nienow v. Nienow, 232 S.E.2d 504 (1977); and Mitchell v. Mitchell, 320 S.E.2d 706 (1984), concerning the factors and criteria which should be considered in the setting of attorney's fees; and she relies upon the discretion of this Court in the determination of the amount of fees, based upon the Court's file, the Court's knowledge of the litigation between the parties, which reflects the difficulty of the services rendered, the time necessarily expended, the result accomplished, the fact that there is no contingency of compensation in a domestic relations case, the professional standing of counsel, and fees customarily charged in this area for similar legal services.

4. Affiant is informed and believes that, during the preparation of this case, the time spent, as set forth more fully hereinafter, was necessary for the protection of the client's interests.

5. Upon Plaintiff's retaining of Affiant, Plaintiff was informed by the office that he would be charged an hourly rate of Three Hundred Fifty (\$350.00) Dollars per hour by Sheila McNair Robinson; One Hundred Seventy-Five (\$175.00) Dollars per hour by Associate Attorneys; and One Hundred (\$100.00) Dollars to One Hundred Fifty (\$150.00) Dollars per hour for Paralegal time.

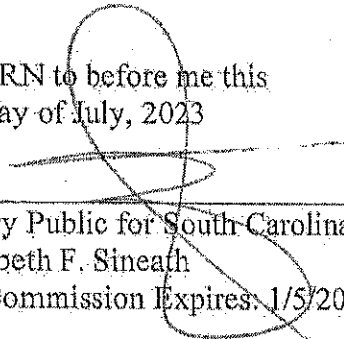
6. Affiant, in accordance with her time and expense records, which are maintained on a daily basis, states to the Court that through July 21, 2023, her fees and costs have been \$384,023.08. She expects to incur additional time representing Plaintiff in this case at the final merits hearing and in drafting the final Order.

7. Based on the time necessarily devoted to this case, the other criteria which have been held to be relevant in the setting of attorney's fees, costs and suit money, and the fact that Plaintiff has insufficient finances to enable him to pay for this action, Affiant, on behalf of her client, requests that this Court review the file herein, together with this Affidavit, and grant judgment in favor of the undersigned's client against Defendant in a sum which may be determined by the Court to be reasonable as attorney's fees, costs and suit money, and that Defendant be required to pay the same within a reasonable time as may be determined by the Court.

Further Affiant Sayeth Not.

  
\_\_\_\_\_  
Sheila McNair Robinson

SWORN to before me this  
31<sup>st</sup> day of July, 2023

  
\_\_\_\_\_  
Notary Public for South Carolina  
Elizabeth F. Sineath  
My Commission Expires: 1/5/2027

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 Grant Meisner, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Rhonda Meisner, )  
 )  
 Defendant. )

IN THE FAMILY COURT  
 FIFTH JUDICIAL CIRCUIT

DOCKET NO. 2019-DR-40-2277

**AFFIDAVIT OF ATTORNEY'S FEES**

Comes now, Brett L. Stevens, the former attorney for Defendant in this matter, who being first sworn states as follows:

1. The charges incurred in this matter on behalf of Rhonda Meisner are set forth in the attached billing records which can be summarized as follows:

**TOTALS:**

**2019-DR 40-2277 (Divorce Action)**

|              |                         |
|--------------|-------------------------|
| Billed Time: | \$6,597.50 (49.3 hours) |
| Costs:       | <u>\$182.05</u>         |
| Total:       | \$6779.55               |

- **Amount unpaid as of 11/3/2022: \$2528.15**
2. Attorney time in this case was charged at \$150.00 per hour which is lower than the fee normally charged in the area for similar services;
  3. I believe all actions taken on behalf of Defendant were reasonable and necessary in the course of litigation;
  4. I have been licensed to practice law in South Carolina since 2006;
  5. I have almost exclusively practiced family law since I opened my own practice in August of 2016;
  6. I have a J.D. from the University of South Carolina (2006); a Master's Degree in English from Clemson University (2001); and a Bachelor's Degree in English and Theatre from Presbyterian College (1999);
  7. This was a difficult case in that it was very litigious, a DSS case was initiated, and an emergency hearing was held at the initiation of this case;

8. I represented Ms. Meisner until she could no longer finance litigation;
9. Further, deponent sayeth naught.

---

Brett L. Stevens, S.C. Bar No. 73830  
Stevens Law, LLC  
1822 Bull Street  
Columbia, South Carolina 29201  
T: (803) 587-8506  
E: Brett@BrettStevensLaw.com

Sworn to and Subscribed before me  
This \_\_\_\_\_ day of \_\_\_\_\_, 2022

Notary Public for South Carolina

Printed Name of Notary: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_