

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF HAMPTON	)	
	)	
RENEE S. BEACH, PHILLIP BEACH,	)	
ROBIN BEACH, SAVANNAH TUTEN,	)	C/A No. 2021-CP-25-00392
AND SETH TUTEN,	)	
	)	
Plaintiffs,	)	
	)	MOTION FOR LEAVE TO DEPOSIT
v.	)	FUNDS WITH THE CLERK OF
	)	COURT PURSUANT TO RULE 67,
GREGORY M. PARKER, GREGORY M.	)	SCRCP
PARKER, INC. d/b/a PARKER'S	)	
CORPORATION, BLAKE GRECO,	)	
JASON D'CRUZ, VICKY WARD, MAX	)	
FRATODDI, HENRY ROSADO, AND	)	
PRIVATE INVESTIGATION SERVICES	)	
GROUP, LLC,	)	
	)	
Defendants.	)	

Non-party Amanda "Mandy" Matney ("Ms. Matney"), by and through undersigned counsel, moves this Court under Rule 67, SCRCP, for leave to deposit the full amount of the July 13, 2026, contempt sanction into the custody of the Clerk of Court for Hampton County. Lunashark Media, LLC will tender those funds to the Clerk on Ms. Matney's behalf. In support, Ms. Matney states as follows:

BACKGROUND

On July 13, 2026, the Court entered its Order Granting Parker's Defendants' Motion for Contempt (the "Order"). The Order found non-party Ms. Matney in contempt for failing to comply with a subpoena. The Order directed Ms. Matney to pay the Parker Defendants \$171,500.00 in attorneys' fees and costs, and it imposed a \$5,000.00 fine payable within sixty days. Together the total sanction was \$176,500.00.

On August 2, 2026, Ms. Matney filed a Motion to Reconsider the order holding her in contempt. If the Motion to Reconsider is denied, Ms. Matney intends to appeal the contempt order. Ms. Matney seeks to avoid further sanctions but also wants to preserve her right to appeal. *See Chappell v. Chappell*, 282 S.C. 376, 377, 318 S.E.2d 590, 591 (Ct. App. 1984) ("The payment of a fine imposed in contempt proceedings also waives the right of review.").

The contempt sanction is a money judgment; therefore, it arguably accrues post-judgment interest. S.C. Code Ann. § 34-31-20(B) provides that "[a]ll money decrees and judgments of courts enrolled or entered shall draw interest according to law." To prevent that interest from accruing during reconsideration and any appeal, Lunashark Media, LLC has agreed to assist Ms. Matney by depositing the full judgment amount with the Hampton County Clerk of Court.

On July 27, 2026, Ms. Matney tried to accomplish the deposit by consent. Counsel prepared a proposed consent order allowing Lunashark Media, LLC to deposit the full judgment amount with the Hampton County Clerk of Court, and providing that the deposit would not waive Ms. Matney's right to move for reconsideration or to appeal. On July 28, 2026, Attorney Moore indicated that the Parker Defendants were unable to consent. Therefore, Ms. Matney brings this motion so that the deposit can proceed with the notice and leave of the Court.

Rule 67, SCRCF, governs deposits into court. It provides that "[i]n an action in which any part of the relief sought is a judgment for a sum of money . . . a party, upon notice to every other party, and by leave of court, may deposit with the court all or any part of such sum or thing, whether or not that party claims all or any part of the sum or thing." Rule 67, SCRCF. Money paid into court under the rule is "deposited as directed by the court" and "withdrawn only upon the check of the clerk of court in favor of the party to whom the order of the court directs." *Id.*

The Supreme Court has found that a judgment debtor's deposit of the judgment into court, pending the debtor's own appeal, stops the accrual of post-judgment interest — provided the debtor complies with Rule 67. *Russo v. Sutton*, 317 S.C. 441, 443–44, 454 S.E.2d 895, 896–97 (1995). In *Russo*, the Court reasoned that such a rule "encourages the debtor to pay the judgment and assures the judgment creditor the funds will be available at the conclusion of the appeal." *Id.* at 444, 454 S.E.2d at 896. The Court grounded that holding in its earlier decisions recognizing that a judgment debtor may prevent the accrual of interest by paying the judgment into court under an order of the court.

The holding comes with a condition. To stop interest, "a debtor must comply with the plain language of Rule 67." *Russo*, 317 S.C. at 444, 454 S.E.2d at 897. The debtor in *Russo* deposited the judgment with the clerk of court unilaterally, with only a notation that the funds were being deposited to stay interest. *Id.* at 442–43, 454 S.E.2d at 895–96. Because he "failed to give notice to [the creditor] that the funds were being deposited, and failed to obtain leave of the circuit court prior to depositing the funds," the Court held his "unilateral deposit of the funds insufficient to stop accrual of the interest." *Id.* at 444–45, 454 S.E.2d at 897.

This motion gives the Parker Defendants notice of Ms. Matney's intentions. This motion also seeks leave of the Court to deposit under Rule 67. That is the procedure *Russo* prescribes. Once the Court grants leave and the full judgment amount is deposited with the Clerk, post-judgment interest stops accruing while Ms. Matney pursues reconsideration and any appeal. *See Bakala v. Bakala*, 352 S.C. 612, 632, 576 S.E.2d 156, 167 (2003) ("Where payment has been ordered and not appealed, and a contempt order is issued to compel payment, a deposit of funds under Rule 67 will not constitute a purge.").

Granting this motion prejudices no one. The deposit places the full judgment amount in the custody and control of the Clerk of Court, where it will be available to the Parker Defendants if the judgment is upheld.

For these reasons, Ms. Matney respectfully requests that the Court order the following:

- (1) Allowing the full judgment amount of \$176,500.00 to be deposited with the Clerk of Court for Hampton County pursuant to Rule 67, SCRPC;
- (2) Allowing the funds to be tendered by Lunashark Media, LLC on Ms. Matney's behalf;
- (3) Directing that the deposited funds be held by the Clerk and withdrawn only upon further order of the Court;
- (4) Providing that, upon deposit, the accrual of post-judgment interest on the contempt sanction be considered stopped as of July 27, 2026; and
- (5) Providing that the deposit does not waive Ms. Matney's right to move for reconsideration or to appeal the contempt order.

Respectfully submitted,

s/ Stuart Axelrod

Stuart M. Axelrod (S.C. Bar 14678)
Axelrod & Associates, PA
4701 Oleander Drive
Myrtle Beach, SC 29577
Office: (843) 916-9300
stuart@gotaxelrod.com

Tristan M. Shaffer (S.C. Bar 77565)
Axelrod & Associates, PA
1550 North Oak Street
Myrtle Beach, SC 29577
Office: (843) 916-9300
tristan@gotaxelrod.com

Rebecca K. Lindahl (S.C. Bar 78495)
KATTEN MUCHIN ROSENMAN, LLP
615 S. College Street, Suite 1700
Charlotte, NC 28202
Telephone: (704) 344-3141
Facsimile: (704) 344-2277
rebecca.lindahl@katten.com

Eric Steven Bland (S.C. Bar 64132)
Bland Richter, LLP
105 West Main Street, Suite D
Lexington, SC 29072
Office: (803) 256-9664
ericbland@blandrichter.com

August 3, 2026