

STATE OF SOUTH CAROLINA
COUNTY OF ABBEVILLE

) COURT OF COMMON PLEAS
C.A. No.: 2025-CP-01-00036

CITY OF ABBEVILLE,

)
PLAINTIFF,

)
V.

)
TOWN OF CALHOUN FALLS; TERRICO
HOLLAND IN HIS OFFICIAL CAPACITY AS
MAYOR OF THE TOWN OF CALHOUN FALLS;
AND WENDI W. LEWIS IN HER OFFICIAL
CAPACITY AS CLERK/TREASURER OF THE
TOWN OF CALHOUN FALLS,

)
AFFIDAVIT AND
VERIFICATION
OF R. BLAKE STONE

)
DEFENDANTS.

PERSONALLY appeared before me, R. Blake Stone, who, being duly sworn, deposes and says that he is the City Manager of Plaintiff City of Abbeville, that he has reviewed the attached Petition for Rule To Show Cause; that he knows the contents thereof to be true of his own knowledge except where stated to be on information and belief and as to those matters he believes them to be true; that as City Manager of the City of Abbeville, he has personal knowledge of the matters set forth herein, that the Court entered an Order of Preliminary Injunction on April 21, 2025 requiring the Defendants to pay each monthly water bill not later than the 10th of each month; that the City of Abbeville did issue invoices on October 1, 2025 in the amount of \$ 72,488.80 which included \$51,572.60 that McCormick owed and paid and on November 3, 2025 in the amount of \$ \$71,775.96 which included \$51,258.20 that McCormick owed and paid; and that full payment has not been paid as of the signing of this document. After partial payments the amount owed on the October invoice is \$ 5,916.20 and \$20,517.76 on the November invoice.

For a total of \$ 26,433.96 past due. Invoices attached hereto as Exhibit A.

SIGNATURE PAGE TO FOLLOW

Signature: R. Blake Stone 
City of Abbeville

Printed Name: R. Blake Stone

Its: City Manager

Sworn to and subscribed before me on December 1, 2025.

Debra Dixon Curtis
Notary Public for the State of South Carolina
My commission expires: 07/07/2031

