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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Jennifer McCoy, Circuit Court Judge

Appellate Case No. 2021-001183

Joe Clemons,Appellant,

v.

Peggy H. Pinnell Agency, Inc., Peggy H. Pinnell Insurance Agency Inc.,
State Farm Life Insurance Company, (jointly and severally liable),
.....Respondents.

**APPELLANT’S REPOSE
TO REPENDENT’S MOTION
REQUESTING THE APPELLANT
AMEND THE RECORD ON APPEAL**

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July 28, 2022

The Respondent submitted this very same motion on May 18, 2022, and the Appeal Court ORDER on **June 30, 2022**, to deny their motion, and this is also the same motion submitted on July 18, 2022. “Respondents, Peggy H. Pinnell Insurance Agency Inc.¹ and State Farm Life Insurance Company, file this Motion to Dismiss, or in the alternative request the Appellate Court to require Appellant, Joe Clemons, to file an Amended Record on Appeal that complies with the Appellate Court Rules. Respondents further move to dismiss the appeal on the grounds that neither Appellant’s Record on Appeal nor his Briefs set forth any error of law by the lower court.” The respondent resubmitting this motion doesn’t make any sense, it seems like he is just stalling for time because maybe he is hoping for certain people or person that was be on the panel that will evaluate this case. The Respondent (Mr. Norris) knows he doesn’t have any truth, proof, nor facts to win this case, this is why he is playing the lawyering game. The Respondent (Mr. Norris) have abandoned his client position concerning the documents in question, falsifying documents, transcripts, ruling of judges, and violated SC rule 3.3 because he **knows** his client have been lying and he had been supported her with that lie at depositions, hearing, trial, and hear again at the Appellate Court. He had **done all these things and more** at the low court level and here he is now at the Appellate Court playing the lawyering game because he know he has no proof, defense, or evidence, all he has is game, and influence hoping that will help him win this case; this defender has no defense.

So, in my conclusion, I am requesting and asking the Appellate Court to deny this waste of time, this is just another maneuver to get me (Appellant) to alter my record of appeal which is consistent with my initial belief and reply belief and with the truth and the proof that I presented with direct and circumstantial evidence. If the Appellate Court is willing, I (The Appellant) have no objection with Mr. Norris (The Respondent) using anything he would like to use that came from

the lower court as long as it is the truth, and he has the proof to support it. Not relying on false transcripts, documents, uncertified transcripts that he has been relying on heavily throughout this appeal process that I have been constantly stating that the trial court hearing and depositions transcripts all have been altered for my defeat and demise of this case.

Respectfully submitted,

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