

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

AUG 03 2022

APPEAL FROM GEORGETOWN COUNTY SC Court of Appeals  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

**Case Number: 2022-000017**

Joseph N. Grate,

Appellant,

v.

Christopher Douglas Brown,

Respondent.

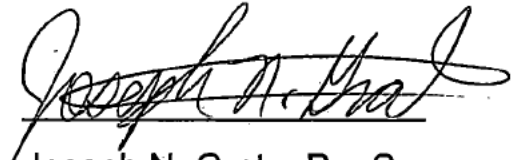
## **OBJECTION TO DEFENDANT'S DISMISSAL MOTION**

Appellant objects to the Dismissal Motion, based upon the following:

1. Appellant has no knowledge of the subject Item, designated for inclusion in the Record on Appeal.
2. Appellant has informed Defendant that he has no knowledge of the subject item.
3. Appellant has repeatedly requested a copy of the specified item, for its inclusion.
4. Defendant has not provided the specified item.

5. Appellant remains hopeful of receiving, from Defendant, any items Defendant wishes to be included.
6. All the foregoing has been communicated to Defendant and to the Court.
7. Appellant cannot be expected to provide anything that he does not possess, per Common Sense Rule.

August 1, 2022

A handwritten signature in cursive script, appearing to read "Joseph N. Grate", written over a horizontal line.

Joseph N. Grate, Pro Se

P.O. Box 1294

Pawley's Island, SC 29585

(843) 742-0696

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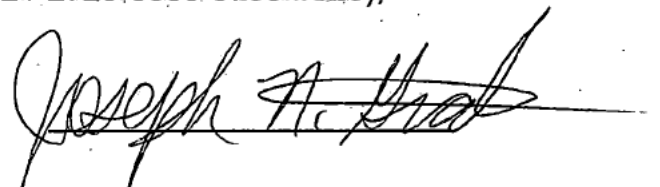
Christopher Douglas Brown,

Respondent.

**PROOF OF SERVICE**

Appellant forwarded a copy of: Objection to the Dismissal Motion, to  
Defendant, via Certified U.S. Mail (7021-2720-0000-9733-1820),

August 1, 2022



Joseph N. Grate, Pro Se  
P.O. Box 1294  
Pawley's Island, SC 29585  
(843) 742-0696

Honorable, Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
P.O. Box 11629 Columbia. SC 29211

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**SC Court of Appeals**

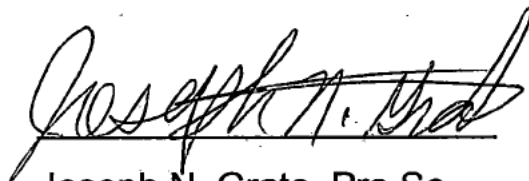
**RE: Joseph N. Grate, Appellant, v. Christopher Douglas Brown,  
Respondent. Case Number: 22 - 000017**

Greetings Madam Clerk:

Submitted herewith, is my Objection to Defendant's Motion to Dismiss,  
along with proof of service thereof.

Sincerely,

August 1, 2022

A handwritten signature in black ink, appearing to read "Joseph N. Grate", written over a horizontal line.

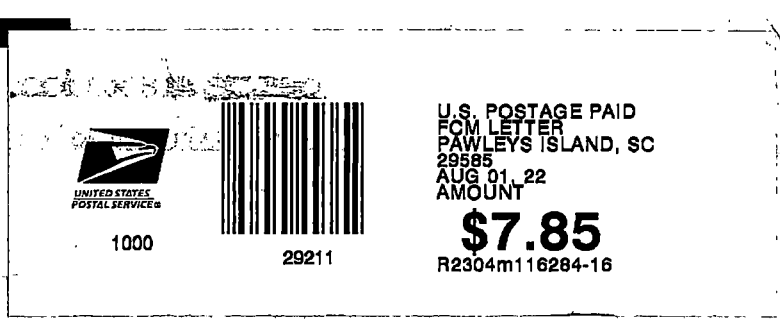
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JOSEPH N. CARAYE  
P.O. Box 1204  
PAWLEY'S ISLAND  
S.C. 29585



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RETURN RECEIPT  
REQUESTED

SC Court of Appeals

CLERK OF COURT OFFICE  
SOUTH CAROLINA COURT OF APPEALS  
P.O. Box 11629  
COLUMBIA, S.C. 29211

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