

**THE SOUTH CAROLINA COURT OF APPEALS**

**APPELLANT'S RESPONSE TO RESPONDENT LETTER OF NOV. 4, 2022**

**November 10, 2022**

**The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211**

**RECEIVED**

**Nov 10 2022**

**SC Court of Appeals**

**V. CLAIRE ALLEN  
CHIEF DEPUTY CLERK**

**RE: Peggy Pinnell & State Farm Represented By  
Charles R. Norris, Respondent V. Joe Clemons, Appellant  
Appellate Case No. 2021-001183**

Dear Mrs. V. Claire Allen, and The Court of Appeals, I'm responding to the respondent/Mr. Norris letter of November 4, 2022.

Frist of all, the respondent is missed reading or interpreting what I requested in my motion for extension and abeyance, I stated "UNTIL" the judge or court make a decision on my motion for subpoena in according with the letter that came from your office on 10-12-2022. I will now quote from my letter of 10-27-2022 "which states, (If you wish for the court to take some further action, you must file a motion.), This motion is for that purpose and I'm also asking this court to subpoena all my court hearings and trial ASCII DISKS AND UNEDITED (rough draft) E-MAIL TRANSCRIPTS, that took place in this case. Because this court knows that I have been complaining about the accuracy of all the documents and exhibits the respondent has been producing and presenting. I have been trying to get those Audio, Disks, and accurate transcripts for over a year from the Court of Administration." So, my abeyance request is based on when the court makes a decision, if they will let me get the things I need to confirm what I have been saying, it is not an open-ended request.

Also, the respondent seems to be so concerned about my request and me getting the recording of hearings and especially trial accurate ASCII DISKS AND UNEDITED (rough copy) and Unedited (rough draft) e-mailed Transcript of 8-23&24-2021. It should be pretty obvious that the respondent/Mr. Norris is not so concern about how I write by final brief, because my final brief will be in accordance with SCACR 211. What he is concern about is all the things that I have been accusing him/them of is true, because I caught them changing the Judge's rulings and falsifying transcripts, and it is all recorded on those recording that the court of administration has, that is why the respondent/Mr. Norris, is fighting so hard to keep me from getting and letting the appeal court listing to those things I has requested. Because of all the things and the blatant disregard of the rule of Law as an officer of the Court and his influence on the Lower Courts, is the only reason why this, (My Case) is here at the Appeal Court right now, because I won my Jury trial, but the judge allows an undeserved Directed Verdict. Furthermore (I believe) the respondent/Mr. Norris former law firm NELSON MULLINS RILEY & SCARBOROUGH LLP, that the respondent/Mr. Norris have been with for decades, let him go. He is so concern about me following the rules, but I CAUGHT him violating and breaking the rules, it all can and will be proved, when we get those things, I have requested and subpoena. The respondent also in his letter of 11-4-2022, is trying again to use his influence in the very same way, he used it on the people in the lower court and the court of administration and South Carolina Office of Disciplinary Counsel of Judges and Lawyers, I, put in complaints about the things 3 judges did and a law clerk, a deputy director of the Court of Administration and Mr. Charles R. Norris, but all my complaints was dismissed without a thorough investigation of the facts which they have access to, because the Court of Administration have all the recordings that I told them about and is complaining about, all this happen because the system protects and covers for their comrades or fellow lawyers. What the respondent is implying, is because of what they have stated or have checked out, that is a sufficient reason I should not be allowed to review those things that the rules state I have a right to do. Also, the rules do not state, let the judges and court of administration listen and make the determination of the accuracy of truth and facts. So, the respondent letter of 11-4-2022, should be dismissed or ignored.

Thank you, Ms. Kitchings & Ms. Allen.

Joe Clemons Pro Se Litigant/Apologist for Appellant

2202 Addidas St. Eutawville, SC 29048  
(843) 753 7007  
November 10,2022.

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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Jennifer McCoy, Circuit Court Judge

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Case No. 2021-001183

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Joe Clemons

Appellant,

v.

PEGGY H. PINNELL AGENCY, PEGGY H.  
PINNELL INSURANCE AGENCY, INC.  
STATE FARM LIFE INSURANCE COMPANY,  
(jointly and severally liable),

Respondent,

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**PROOF OF SERVICE**

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I certify that I have served the **APPELLANT'S RESPONSE TO RESPONDENT LETTER OF NOV. 4, 2022** on Respondent by electronic service on November 11, 2022, as reflected on email attached hereto and as referenced below:

Charles R. Norris, Attorney  
charles@whelanmellen.com

By: s/Joe Clemons, Pro Se  
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(843) 753-7007

Eutawville, South Carolina

November 10, 2022