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| STATE OF SOUTH CAROLINA |) | IN THE COURT OF COMMON PLEAS |
| |) | FIFTH JUDICIAL CIRCUIT |
| COUNTY OF RICHLAND |) | CASE NUMBER: 2021CP4006223 |
| Edward Tyrone Hills |) | |
| Plaintiff |) | |
| vs |) | MODIFIED |
| Dean, University of South Carolina |) | BRIEF |
| Defendant |) | |
| _____ |) | |

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SC Court of Appeals

The plaintiff, Edward T. Hills, submits this Brief, for the reasons set forth below, and the Court should grant Edward T. Hills Motion.

The summons is a legal document. It is an "absolute" document. The summons says "YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you and TO SERVE a copy of your answer to this complaint upon the subscriber at the ADDRESS SHOWN BELOW, within 30 days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default WILL BE rendered against you for the relief demanded in the complaint."

The defendant is in default. The defendant received the Affidavit on January 7th, 2022. The Plaintiff received the answer to the complaint on February 10th, 2022; therefore, defendant IS in default. Electronic filing of the Summons has nothing to do with the Plaintiff receiving the Summons, the Summons is a legal document that should be answered by the defendant in written form and delivered to the Plaintiff. Filing a document on the 7th and mailing it on the 7th does not mean that the Plaintiff received it on the 7th PER SUMMONS, SEE ATTACHED.

The plaintiff had a hearing on September 21st,2022. The plaintiff never received the information concerning the directions for entering a brief or memorandum to the judge, the paperwork did not get to the plaintiff until September 15th, 2022, which the date to file a brief or memorandum was September 14th to the judge. This was a flagrant breach of court proceedings during the hearing. The plaintiff never had an opportunity to defend himself. The judge had already found the default judgment in "judgment for the defendant" the plaintiff had to object when the judge allowed the defendant to start their opening statement, stating their memorandum, and let her know that the plaintiff never had the opportunity to file a brief or memorandum due to the clerk of court never sent the plaintiff the paperwork in time. The defendant is in default not because of the electronic filing but because of the summons "A absolute document" which states that they had to have a written answer to the complaint within 30 days or judgment and relief is for the plaintiff in this case it will be \$100 million dollars.

DATE: November 21, 2022

Signed this 23rd day
of November 2022
Betty L. Dement
NOTARY PUBLIC

Edward T. Hills

EDWARD T. HILLS
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