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SC Court of Appeals

BRIEF OF APPELLANT*

THE STATE OF SOUTH CAROLINA
[In The Court of Appeals]

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, Circuit Court Judge

Case No. 2022-CP-00-000967

Rachel M. Polite, A/K/A
Rachel Chaplin

Respondent,

v.

Karen P. Polite

Appellant.

[INITIAL] BRIEF OF APPELLANT

s/ Karen P. Polite
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Pro,se Karen Polite



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THE INITIAL BRIEFING

This case was In The Court Of Common Pleas in the county of Beaufort South Carolina, Trial Held Monday , April 11,2022. Present at the hearing was Rachel, Rachel M. Polite Chaplin and her Attorney, Alysoun M. Eversole, Witness Donald Mitchell /Respondent.

V.

Karen P. Polite Pro-Se, Witnesses Antonio Anthony Polite and Thomas Smalls /Appellant

Nazarene Holmes Mother to Appellee- Emily Holmes the Grantor- (Deceased Family Member and Grantor)

Bubby Polite Ex-Husband to Rachel Polite Chaplin

Nazarene Holmes survived by Plaintiff: Rachel Polite Chaplin, mother of youngest daughter the Defendant: Karen P. Polite Father Bubby Polite is survived by youngest daughter Karen P. Polite

INTERESTING OTHERS

Ex- Attorney, Robert B.Varndo for Appellant Karen P. Polite // Court Reporter Ms.Theresa D. Saxon Hired by; Attorney Alysoun M. Eversole

“INTRODUCTION / ARGUMENTS”

The Appellant argued that the April 11,2022 case from Beaufort County Circuit Court be Reversed and Remanded Because ,The Court Erred Judgment and The Final Order Karen P. Polite is an Heir of her father, The late Bubby Polite .79 acre of land, and should not be Ejected from the property where she lived for more than 30 years on 114-B and NOW changed to 114-A

THE FINAL ORDER PROCEDURAL POSTURE / THE COURT ERRED

Karen P. Polite thy Appellant Appeal this case based on the Lower Court Judgment and Final Order April 11, 2022 at trial **ERRORS, MISTAKES, CONFUSION** that includes incorrect Dates, Years, Answer Filed Wherein "Complaint", Reference to Answer, Deceitfulness, with Possibility of Perjury at the April 11, 2022 at trial.

PROCEDURAL POSTURE: "Respondent "Complaint" seeks an order of the Court ejecting the Appellant from the Property on the grounds of Trespass". The court would state The Appellant filed an Answer wherein she stated she owns the real property by Adverse Possession".

1. **KAREN POLITE-FILED AN ANSWER:** Appellant said "I believe I have or show shared interest in this property, with permission from my father Bubby Polite. "After 31 years of living on the property located at 6 Ladson Road, St. Helena island South Carolina 29920".
2. **FILED AN ANSWER:** "I believe my Mother Rachel stated, several facts outlining me as being a squatter, I **Accept**". KAREN POLITE Filed an Answer wherein she **DID NOT** stated "she **Claims** she owns the real property by; Adverse Possession".
3. **THE FINAL ORDER- FINDINGS OF FACT:** In the final order, the Court stated "Defendant was giving permission in about 1983 to put a mobile home on the property, Karen did not have a home until 1988 she was 17 years old in 1983"
4. **THE FINAL ORDER: PROCEDURAL POSTURE:** The court would explain saying "The December 2, 2020, Consent Order for
5. The Temporary Injunction was wherein the parties were enjoined from", "among other things, disturbing each other, and the Plaintiff would access her home **over property located at 525 Seaside Road**", " and the Defendant would continue to access her over Ladson Road and driveway on the property". The Defendant filed a "Notice of Motion and Motion" for The December 2, 2020, Consent Order for The
6. **THE FINAL ORDER -PROCEDURAL POSTURE:** "Temporary Injunction" because she believed she was being harassed, and her property was being destroyed Exhibit 20 two flash drives, explaining the truth of the matter, explained how the property was separated from each other, "among other things, disturbing each other". The same order prepared by; (Eversole's Law Firm) Attorney, for Rachel Polite / THE COURT ERRED
 - a. And I quote; " each party shall access their (individual residents) by using the separate driveways the parties use prior to the filing of this action"

- b. "1) Rachel " is to access her home at 8 ladson Road by way of the access" commencing from Seaside Road **through a parcel of land (owned) by Rachel located at 525 Seaside Road"**
- c. "2) Karen "is to access her residence located at 6 ladson Road by way of access commencing from ladson Road over a driveway leading to the front of Defendant's residence, "3)each Party shall instruct their guests and invitees to access the Parties respective residence according to the term of this order" "

IT IS FURTHER ORDERED THAT FOR THE PURPOSE OF THE WITHIN ORDER" ,THE DRIVEWAY LOCATED IN FRONT OF PLAINTIFF'S" HOME AND IN THE REAR OF DEFENDANT'S" RESIDENCE AND SHALL BE THE "TEMPORARY COMMON BOUNDARY SEPARATING PLAINTIFF'S AND DEFENDANT'S PORTION OF THE DISPUTED PARCEL"

The court erred

"STANDARD OF REVIEW"

Eversole had actual knowledge about this entire property, and anyone whose names were listed and who prepared the 1983 deed, for her client Rachel Polite but, would not bring any document to prove her client innocence, how parts of the property became 114-B, where Karen filed her Answer May 15, 2020 wherein she claims she lived on the property for years at 114-B. The Introductory and testify April 11, 2022 at trial. Karen was forced to fight for her father's Legacy, alone and she did from October 31, 2019, April 12, 2020,

and Karen would Filed An Appeal July 12, 2022. Eversole client Rachel chose to allow the 1983 split to remain the same, and Karen too remain on property, until her father Bubby would Pass Away, May 14, 2018

THE FINAL ORDER: PROCEDURAL POSTURE: Eversole client Rachel would take her now deceased Exhusband youngest daughter to court, Ejecting Karen from the Property on the grounds of Trespass. The court errors would cause Karen a substantial amount of damage, but what followed brought on a great amount of financial burden and hardship to Karen's life.

EVERSOLE -WITNESS RACHEL POLITE: Rachel testified and said" her mother Nazarene Holmes had lost the property many years ago". Why didn't Allison Eversole client, Rachel Polite testify at trial the year, or date her mother lost title to the property.

1. **EVERSOLE -WITNESS RACHEL POLITE:** Rachel testified and said "In 1972 she wanted to re-acquire the property", "but was unable to obtain a bank loan on her own"; "so her husband, "Bubby Polite", "obtained the financing". "Where is the proof

2. **EVERSOLE -WITNESS RACHEL POLITE:** Rachel testified and said" the deed was put in his name" ,Eversole client Rachel testified that "she could not afford to buy the property, and asked Bubby to cosign for her and he did.Where is the proof
3. Why would the father give the wife the same property he gave his daughter in 1988 or put his youngest daughter on the same property after he gave the wife the 1 acre after she divorce him. This makes no sense.
4. **EVERSOLE - PLAINTIFF'S EXHIBITS: 1,2,3** The two deeds Exhibits 1,2 and Plat 3 only prove what Emily Holmes had sold to Bubby in 1972, and what Eversole client Rachel received from Bubby Polite doing the divorce, in 1989.
5. Eversole's client, Rachel's testimony only proves one thing, she is not capable of telling the truth, "Beyond A Reasonable Doubt" the basics of this case, and **Eversole's witness Rachel testified** at trial that, the property was "3 1/2 acre then 1.79 acre and now .79 acre.
6. **EVERSOLE -WITNESS RACHEL POLITE:** Rachel testified and said" because when the water line came for the water hydrant they took" a portion of the property and that's why it's 79 acres now". Where is the rest of the property? 114-B where Karen lived for over 30 years is now 114-A. WHAT happened to the property? Karen Polite home and separate tank never moved. Nothing would reduce the property to .79 acres except Eversole client, Rachel Polite chaplain deception, deceiving the court of law at trial on April 11,2020.
7. **EVERSOLE -WITNESS RACHEL POLITE:** Rachel testified and said" in a handwritten letter on October 26, 2019 Karen built a two car garage"and interfered. This was a shed, and yes that's true Karen interfered many times, only because Karen believed the .79 acres was her property.

(OH)**Metes andBound1992**

https://www.law.cornell.edu/wex/metes_and_bounds

"legal description" of a land.For example, rivers, roads, trees, etc.

8. Karen mobile home would occupy the majority of the .79 acres of land identify as address 6, on **Eversole client Exhibit 6 Area Map**
9. **EVERSOLE -WITNESS RACHEL POLITE** Because the of such small size and space None of Eversole client Rachel double-wide would fit on the property Aerial map Exhibit # 6 prove this fact no matter how many trees she removes from the property. who would

also testify to removing trees from the property, front and back to bring three mobile homes on the property.

10. **EVERSOLE -WITNESS RACHEL POLITE:** October 31, 2019 when plaintiff delivered the letter to Karen , the notice was unclear to vacate which property? **Eversole client Rachel Polite Exhibit 4 handwritten letter:** Karen did not respond to the letter because she believe that she owner property including the driveway, that she had maintained for more than 30 years clear and visible to family, friends, neighbors and
11. **EVERSOLE -WITNESS RACHEL POLITE:** The handwritten letter state's and I quote;from the time that you were allowed to put your trailer there you have not paid **NO PROPERTY TAXES, Exhibit 4 handwritten letter: EVERSOLE -WITNESS RACHEL POLITE:** and client Rachel Polite would testify reference to the handwritten letter by reading the letter than,her story would changing
12. **THE FINAL ORDER- FINDINGS OF FACT:** The court stated," The Defendant contributed to the payment of the real property taxes up until 2013. **Changing Her Story Eversole client Rachel Polite Exhibit 4 handwritten letter further proves Karen Polite Accusations are true** The Court Erred

" OTHER FACTS OF DECEPTION

13. **"EVERSOLE-WITNESS RACHEL POLITE:** During the trial Eversole would have her witness and client Rachel Polite identify and testify to another (**JUDGE NAME MCINTYRE**) while using another (**JUDGE DOCUMENT FREDERICK M. CORLEY**). Eversole question her client about "an action in the **Magistrate's Court** case number 2019CV0710401850

Court the notice to vacate on October 31, 2019" (Exhibit 7) The Court Erred, when
14. **KAREN POLITE,CROSS-EXAM- RACHEL POLITE** at trial and said"was McIntyre ever your Attorney? Rachel's answer was "No not for anything concerning no property".
15. In December 2, 1988 the deed for 1 acre from Bubby Polite was prepared by; Attorney Judge McIntyre at the time according to The Divorce Decree KAREN POLITE Exhibit 1 , who did not dismiss the case, but dismissed without prejudice" December 2, 2019 Rachel (Exhibit 7) Eversole and client Exhibit 7 clearly don't have anything to do with (**JUDGE MCINTYRE)NAME AT TRIAL**
16. **KAREN POLITE CROSS- EXAM EVERSOLE WITNESS RACHEL POLITE:**

17. **KAREN POLITE- EXHIBIT 16 RECEIPT**-Karen receipt and Eversole's client Rachel Exhibit 6 Aerial photo shows three parts dividing the property, but only one deed shows up for court on April 11, 2022 Eversole client Rachel Polite testified that "she bought the rest of the property in 1983, while she was still married to Bubby Polite". **WHERE IS THE PROOF, AND WHAT DOCUMENT DID YOU USE ?**
18. **KAREN POLITE CROSS- EXAM EVERSOLE WITNESS RACHEL:** The court would describe Eversole witness Rachel exhibit 3 What did show was the true owner Deed to the property of Bubby Polite and what he gave Allison Eversole client Rachel a portion of the 1 acre of land, when she divorced him, Karen Exhibit 1 in 1989.
1. **KAREN POLITE CROSS- EXAM EVERSOLE WITNESS RACHEL:** Eversole and her client Rachel original 1972 exhibit 3 (Plots 1.003) from the sale of Emily to Bubby showing 1.003 acres with further questions used in the trial as Karen and The Court would cross- exam Allison Eversole witness Rachel".
 2. **KAREN POLITE CROSS- EXAM EVERSOLE WITNESS RACHEL:**witness Rachel The Court would ask "do the 1972 exhibit 3, describe as the 1972 exhibit 3 (plot/ 1.003 acres) of land", the distance of the property from the front to the back, using "square footage average in the area", and also describe "do the distance of a mobile home belonging to the witness," that was put in front of Karen's home" in 2001 that's no longer there".
 3. **KAREN POLITE CROSS- EXAM EVERSOLE WITNESS RACHEL** who would also testify to "removing trees from the property, front and back to bring three mobile homes on the property".
 4. **KAREN POLITE CROSS- EXAM EVERSOLE WITNESS RACHEL:** would testify to The Courts stating," the property goes beyond the front of the property" "where Karen house is", "and beyond the back of the property" "where the witness lives". The Court was correct that Rachel would testify at trial, the property was "3 1/2 acre then 1.79 acre and now .79 acre "Rachel polite with testify saying because when the water line came for the water hydrant they took a portion of the property and that's why it's 79 acres now
 5. **Karen cross-examine Allison Eversole's witness Rachel** about Donald Mitchell who a. was in the courtroom the entire trial, and Eversole and her client Rachel would exit and or excused themselves from the courtroom during the trial, while Eversole client Rachel was being cross-examine by Karen Polite, None of which was recorded in the transcript from the April 11,2022 trial by Teresa Saxon the court reporter, who would only correct Exhibit 16 and17,

6. **KAREN POLITE - WITNESS THOMAS SMALLS:** Karen's witness Thomas Smalls said" that a dirt road came straight between you (Karen) ,and your mother (Rachel)". Mr Smalls also testified that your house (Karen) was closest to the woods, and your mother (Rachel) house was on a hill. Mr. Small would also testify " that Rachel house was on the left side and Karen house was on the right side".

KAREN POLITE-FILED ANSWER WHEREIN COMPLAINT: Karen's reference to her Answer wherein the complaint filed May 15,2020 "states that Rachel Polite and Donald Mitchell had split 1 acres of land in 1983, 114-C belong to Donald Mitchell,and (114-A and 114-B) belongs to Eversole client Rachel Polite according to her exhibit 6 and Karen exhibits 16 receipts.

1. **KAREN POLITE-FILED ANSWER WHEREIN COMPLAINT:** Karen referenced the three properties, 114-A,114-B, 114- C. was split Respondent' Exhibit 6 Aerial photo and Appellate Exhibit 16 receipt. The court would error because it clearly shows, without a doubt there are 3 different properties and or parcels of Land.

Eversole's client Rachel Polite, changed and or altered Karen's father Bubby Polite property, that Bubby he bought from Emily Holmes in 1972. The facts still remain the same that Rachel divided this property in 1983 using whatever documents she had in 1983.

2. **KAREN POLITE-DEFENDANT'S EXHIBIT 16 RECEIPTS:** Karen exhibits 16 receipts, which will also show the 1 acre split in half. Rachel exhibit 6 Aerial map would prove where the property was split, and supports Karen's answer to the complaint.
3. **KAREN POLITE answer to the complaint reference** to her filed May 15,2020 States that Eversole client Rachel Polite and Donald Mitchell had split 1 acres of land in 1983 and 114-C belongs to Donald Mitchell, Karen exhibit 16 will prove the fact
4. **WITNESS- KAREN POLITE:** Karen testified and said "On February 25, 2017 the plaintiff and daughter would bring a third mobile home onto the back of my property without Karen permission, and would then damage her light pole.
5. **WITNESS- KAREN POLITE:** Karen testified and said she would "tell Rachel and her new husband that this was her yard", "and no one will damage my property".
 - a. **Witness -KAREN POLITE** testified that Rachel would be "told by; family members" they would never come back to Karen home, or yard anytime soon. Because of Karen bickering about keeping the front of her yard clean".

- b. **KAREN POLITE- EXHIBIT 16 RECEIPT:** The 1983 split of the property, while Bubby Polite and Eversole client Rachel Polite was separated , not divorced and still married the Ex- wife had the property split wrong and or altered. The two would divorce in 1989, Karen Polite Exhibit 1 Divorce Decree
- a. No tax map or zoning permit from Eversole client Rachel Court's errors No Evidence or proof of such, would verify the location of the old houses , mobile homes and or separate tanks on the property Allison Eversole tried to protect her client by hiding the truth.

STATEMENT OF FACTS

“The Court’s Final Comments And Ruling”: Donald Mitchell "said to the court that's why I was trying to get your attention" (Judge) to tell" you this was my land" ,Donald Mitchell was brave enough to tell the truth, had the courage to step up and speak out telling the truth admit at The Court's. Mistakes were made and the court erred on the facts of the April 11,2020 trial and its Final Ruling . Eversole did not Cross Exam or Rebut Karen evidence or accusation Karen claims wherein she filed prior to and the trial was False but instead having Karen to pay the \$500. Bond every month for her Father's property, this was wrong.

Proving Karen Polite was right that Eversole client Rachel Polite and Donald Mitchell splitting my Father's property in 1983 Karen Exhibit 16, **KAREN POLITE-FILED ANSWER WHEREIN COMPLAINT** and Eversole client Rachel Exhibit 6 Aerial Photo. The court erred : Eversole Witness Rachel did not prove anything or tell the truth about the property, and she was under oath, she only proved how bad, she wanted this property all to herself.

Facing the possibility of committing perjury Eversole and her client Rachel choose to ignore the truth by using tricks and confusion to confuse the court about this property , Eversole client Rachel Polite purposely intended to deceive and allowed greed took over herself and anyone who would listen, or believe.

Bubby Polite was not the rightful owner of the property, and his youngest daughter Karen was not his Heir. But The Court Would Erred. The Property Belong To The Late Bubby Polite And Now The .79 Should Belong To His Heir Karen Porshia Polite.

Eversole and her client Rachel Polite needed to right this wrong, proven beyond a reasonable doubt which they did not. Instead Allison Eversole and her client Rachel Polite would take Karen Porshia Polite to trial as an Heir of the late Bubby Polite, wasting the courts time and money.

The truth and fact is mistakes were made, and the court erred on the facts of the (April 11, 2022) trial and its Final Ruling, Eversole tried to protect her client by hiding the truth, but her witness Donald Mitchell had the courage to step up and speak out telling the truth.

While Karen paid \$1767 for a transcript that was supposed to be \$1572. Everyone would reap the benefits including Teresa Saxon, who would address Karen while she was ProSe and said "I am an independent court reporter who was contracted by Ms. Eversole's office to report the hearing",. "IN EMAILS"

The court reporter also stated "that no hearing of the transcript was ordered by;" Ms. Eversole's office" Eversole would respond to my email on June 22, 2022, "You will need to contact your own attorney in regards to the below email and correspondence". Eversole said "I have spoken to Teresa Saxon and you may order a transcript through her or your attorney may order one from her". If Robert B. Varnado was truly my attorney, why didn't he try to help said nothing at all, he never said" a word, in any of the emails I was alone everywhere just fighting to win, the right way, in front of The Courts of Law and Witnesses at the trial on April 11, 2022 and now.

Teresa Saxon the court reporter had only two of Karen 21 Exhibits labeled and or identify from the transcript, there were other errors in this transcript but, Teresa Saxon the court reporter would only correct Exhibit 16 and 17, Karen Polite believe that one other Exhibit is missing proof of Eversole client Rachel, transaction between her and Donald Mitchell.

Karen would address the court at the motion hearing on November 7, 2022. Karen would be right about the exhibits and, before she received the transcript, from the court reporter Teresa Saxon.

The court errors would cause Karen a substantial amount of damage, but what followed brought on a great amount of financial burden and hardship to Karen's life.

Eversole knew and would learn about her client Rachel deception, before the trial began from Karen, who would file an Answer to the complaint May 15, 2020, and or after the trial ended

April 11, 2022 from one Attorney Robert B. Varnado, Karen Polite would later dismiss Varnado because she believed something was wrong based on his conduct and behavior she "manifested something was wrong", right away Karen felt like, she was being deceived by deception, trickery and confusion when he invited himself into this case, after the fact saying one thing and doing another.

Eversole will explain why she would sanction Attorney Robert B. Varnado even though Mr. Varnado chose to use her 7 different Exhibits from the trial, instead of using Karen 21 Exhibits from the trial. And none of the important evidence Karen would give him he would use. Eversole will tell the court her elements of the Law and will explain why she and Mr. Varnado was non-compliance with Karen requesting the transcript for her appeal. Karen and the court reporter Teresa Saxon would argue back and forth through email, about the transcript while others would witness.

“CONCLUSIONS”

Eversole did not Cross Exam Karen, or Rebut Karen evidence, or Rebut Karen accusation, at the trial or Karen claims wherein she filed prior, to and or during the trial, to prove something was False. Mistakes were made and the court erred on the facts of the April 11,2020 trial and its Final Ruling .The remainder of the property should have gone to Karen the heirs of Bubby Polite . The facts still remain the same that Rachel divided this property in 1983 using whatever documents she had in 1983 the property shown in Karen exhibit 16 receipt, which will also show the 1 acre split in half. Rachel exhibit 6 Aerial map would prove where the property was split, and supports Karen's answer to the complain

“ CONCLUSIONS OF FACTS”

KAREN FATHER NOW DECEASED BUBBY POLITE HAD PURCHASED THE (?) ACRES OF LAND AND HOUSE TOGETHER APRIL 13,1972 FROM NOW DECEASED Emily Holmes BUBBY POLITE PROPERTY WOULD BE SPLIT AND SOLD SEPTEMBER 19, 1983 STAND CORRECT WHILE SEPARATED” BEFORE THE DIVORCE ENDED IN DECEMBER 12, 1989, by; EX- WIFE RACHEL IN SEPTEMBER 19, 1983 STAND CORRECT WHILE SEPARATED FROM HER NOW DECEASED EX-HUSBAND” AND .79 ACRE THAT WAS 114-B FOR MORE THAN 30 YEARS NOW 114-A SHOULD BE REVERSE BACK TO HIS HEIR KAREN PORSHIA POLITE FOR THE REMAINDER OF HER LIFE

“South Carolina Code Section 15-61-10 (2018) - Partition is compellable between certain joint tenants and tenants in common; Determination if property is heirs' property. :: 2018”

“South Carolina Code of Laws :: US Codes and Statutes :: US Law :: Just”

<https://law.justia.com/codes/south-carolina/2018/title-15/chapter-61/section-15-61-10/>

“RELIEF FROM A JUDGMENT OR ORDER”

Karen asked that this case be reversed, entering a judgment in favor of Karen by awarding Karen The Entire .79 acres of land to her and heir of Bubby Polite, the rightful owners of such along with any existing property split and sold before 1989 Related to the property. “Because the court erred judgment in favor of Eversole client Rachel Polite with no solid evidence **and any and all other relief the Court deems just and proper in the circumstance”**

“Federal Rules of Civil Procedure > TITLE VII. JUDGMENT” >

“Rule 60. Relief from a Judgment or Order (As amended Dec. 27, 1946, eff. Mar. 19, 1948; Dec. 29, 1948, eff. Oct. 20, 1949; Mar. 2, 1987, eff. Aug. 1, 1987; Apr. 30, 2007, eff. Dec. 1, 2007.)”

<https://www.proz.com/kudoz/english/law-patents-trademarks-copyright/1232240-and-any-and-all-other-relief-the-court-deems-just-and-proper-in-the-circumstance.html>

“ THE COURT ERRED BY ALLOWING THIS CASE TO BE USED UNDER”

“Judicial Misconduct and Public Confidence in the Rule of Law <https://www.unodc.org/dohadeclaration/en/news/2019/08/judicial-misconduct-and-public-confidence-in-the-rule-of-law.html> Anyone or person that may have involved him or herself, interfering and influencing any parties by attempting to interrupt this Appeal Under False Pretense. “Wasting the court time” should be held accountable for their action”.

Pursuant to SC Code § 16-13-240 Law

“False pretense is defined as taking or obtaining property, money, or signature of another through the use of tricks, lies, or deception. It is a crime to obtain a signature, money, or property from someone under false pretenses or misrepresentation of a fact with “intent to cheat and defraud a person of that property.” Simply put, if you obtain money, property, or the title to property”(Jul 6, 2022)

SECTION 27-11-40.” Ratification and confirmation of former patents, grants, and the like saving claims of third persons.”

.”<https://law.justia.com/codes/south-carolina/2021/title-27/chapter-11/section-27-11-40/>”

“Perjure Yourself Verb”

“(Criminal law) commit perjury, lie under oath, forswear, bear false witness, give false testimony, swear falsely Witnesses lied and perjure themselves”. “Collins Thesaurus of the English Language – Complete and Unabridged 2nd Edition”. (2002)©

(HarperCollins Publishers 1995, 2002 <https://www.thefreedictionary.com/perjure+yourself>(Judge warns lawyers not to waste court time and client money(04 May 2015) •

By“Leanne)Mezrani<https://www.lawyersweekly.com.au/newlaw/16470-judge-warns-lawyers-not-to-waste-court-time-and-client-money>”

“CONCLUSION”

“For the reasons stated, this Court should reverse the judgment of the circuit court.

Respectfully submitted”,

February 3,2023

s/ Karen P. Polite
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PROOF OF SERVICE OF A NOTICE

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

FEB 03 2023

APPEAL FROM BEAUFORT COUNTY

SC Court of Appeals

Court of Common Pleas

Marvin H. Dukes, Circuit Court Judge

Case No. 2022-CP-07-000967

Rachel M. Polite A/K/A
Rachel Chaplin

Respondent,

v.

Karen P. Polite

Appellant.

PROOF OF SERVICE

I certify that I have Served Copys Of The Initial Brief February 3, 2023 of the April 11, 2022 Trial, This Notice of service to Attorney of record, for Rachel M. Polite here by, served by depositing of it in the United States Mail, postage prepaid, on February 3, 2023 and or Hand delivered to the office addressed to her Attorney of record, Alysoun M. Eversole at, 1509 King St. Beaufort, South Carolina 29902 [by personally delivering a copy of it to her attorney of record,

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