

**RECEIVED**

**Mar 17 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Judge

Laurens County

---

Case No. 2021-CP-30-00473  
Appellate Case No. 2022-001454

Mosi A, Bundu,

Appellant.

v.

Maria Youmans and Dean Youmans,

Respondents.

---

RESPONDENTS' MOTION TO DISMISS

---

Pursuant to Rules 208 and 209 of the South Carolina Appellate Court Rules, the undersigned counsel moves to dismiss the above-captioned appeal due to the fact that the Appellant has failed to timely serve his initial brief and designation of matter.

On September 28, 2022, the *pro se* Plaintiff, Mosi A. Bundu, filed a Notice of Appeal from the Circuit Court's Order, dated August 28, 2022, dismissing the Plaintiff's complaint. On December 21, 2022, the Circuit Court issued an Order granting Plaintiff's motion to order the transcript of proceedings outside of the filing deadlines. On January 27, 2023, the Circuit Court Reporter mailed the transcript of proceedings to Mr. Bundu with the understanding that it would

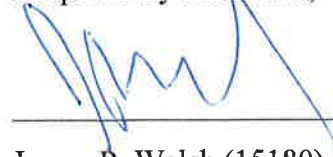
reach him the next day. See Exhibit A. Mr. Bundu may be presumed to have received the transcript on January 28, 2023, or within a few days thereafter.

Pursuant to Rule 208(a)(1), SCACR the appellant shall submit his initial brief on all parties to the appeal within thirty (30) days after receiving the transcript. Pursuant to Rule 208(4), SCACR, “[u]pon the failure of the appellant to file and serve his brief within the time prescribed, the clerk of the appellate court shall sign an order dismissing the appeal [...]” Pursuant to Rule 209(a), SCACR, “[a]t the same time a party serves his initial brief(s) under Rule 208, to include a reply brief, he shall also serve on all parties to the appeal a Designation of Matter to be Included in the Record on Appeal which shall set forth with specificity those parts of the transcript, pleadings, orders, exhibits, or other materials which he proposes to include in the record on appeal.”

As of the date of this motion, it has been over forty (40) days since January 28, 2023, and the Respondents have not been served with Mr. Bundu’s initial brief or designation of matter. Based on the foregoing, the undersigned counsel respectfully moves to dismiss Mr. Bundu’s appeal. As set forth above, he has failed to file an initial brief and designation of matter within the time prescribed by the South Carolina Appellate Court Rules. Therefore, in accordance with those rules, Mr. Bundu’s appeal should be dismissed.

[Signature appears on following page.]

Respectfully submitted,



---

James P. Walsh (15180) and  
John D. Harjehausen (76194)  
**Clarkson, Walsh & Coulter, P.A.**  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400 Phone  
(864) 235-4399 Fax  
jwalsh@clarksonwalsh.com  
jharjehausen@clarksonwalsh.com

**ATTORNEYS FOR RESPONDENTS**

Greenville, South Carolina  
March 17, 2023

EXHIBIT  
A

SCANNED

2/7/23

*CAH*

**The South Carolina Court Of Appeals**

Post Office Box 11629  
Columbia , SC 29211  
1200 Senate Street  
Columbia, SC 29211

JERRY A. HARRINGS  
Clerk  
V. Claire Allen  
Chief Deputy Clerk

*Case# 2022-001454*

After notification of deficiencies in sending court reporter documents, appellant is resending email correspondings to oppposing council and the clerks office. Appellant is also sending these emails to the court administrators office.

Cc: James P. Walsh, Esquire  
John D. Harjehausen, Esquire  
1164 Woodruff Road  
Greenville South Carolina 29607  
02/02/2023

Appellant/ Pro Se Litigant

Mosi A. Bundu  
206 Kelly Street  
Laurens SC 29360

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Thursday, December 29, 2022 11:59 AM  
**To:** Green, Pamela E. <PGreen@sccourts.org>  
**Subject:** Re: Mosi Bundu v. Maria and Dean Youmans

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Ms Green, I am reaching out after obtaining permission to request transcripts outside for the time frame. Please send me payment information and an address to send the payment.

Respectfully,  
Mosi A. Bundu  
206 B Kelly Street  
Laurens S.C. 29360  
864-3407758/59

Sent from my iPhone

On Dec 7, 2022, at 10:44 AM, mosi bundu <spinmas@yahoo.com> wrote:

I did a mail search using your name, this is the only email from you. Could you tell me when you were notified of my request and by whom.

Thank you

On Tuesday, December 6, 2022, 01:34:45 PM PST, Green, Pamela E. <pgreen@sccourts.org> wrote:

Mr. Bundu,

Tammie Holmes said you did not receive my email about your transcript request. So I am forwarding this to you. Please read below for instructions on how to obtain this transcript.

**Pamela E. Green**  
Circuit Court Reporter  
At-Large

**From:** Green, Pamela E.  
**Sent:** Wednesday, November 23, 2022 9:49 AM  
**To:** spinmas@yahoo.com <spinmas@yahoo.com>  
**Cc:** Transcripts <transcripts@sccourts.org>  
**Subject:** Mosi Bundu v. Maria and Dean Youmans

Mr. Bundu,

I have been asked by Court Admin to prepare the above referenced transcript for a hearing date of 11/16/21 only.

I wanted to let you know the cost for this transcript. It looks like this hearing lasted for about 30 minutes. I can only give you an estimate of the page numbers. A 30 minute hearing is usually about 25 pages. The cost per page is \$4.25 per page. Also court reporters have 60 days to provide you a transcript.

If you wish to receive this transcript, you would need to mail \$106.25 to my address of PO Box 819 Reidville, SC 29375 and I will forward the transcript on to you when it is completed.

**Pamela E. Green**  
Circuit Court Reporter  
At-Large

----- CONFIDENTIALITY NOTICE ----- This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

Re: Mosi Bundu v. Maria and Dean Youmans

spinmas@yahoo.c.../Inbox



Green, Pamela E. <pgreen@sccourts.org>  
To: mosi bundu <spinmas@yahoo.com>

Jan 27 at 10:02 PM

Mr. Bundu,

I put your transcript in the mail today to you. It says it will be there tomorrow.

Best wishes to you.

Pamela E. Green  
Circuit Court Reporter  
At-Large

From: mosi bundu <spinmas@yahoo.com>  
Sent: Wednesday, January 18, 2023 11:07 PM  
To: Green, Pamela E. <PGreen@sccourts.org>  
Subject: Re: Mosi Bundu v. Maria and Dean Youmans

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Thanks

Sent from my iPhone

On Jan 17, 2023, at 6:49 PM, Green, Pamela E. <PGreen@sccourts.org> wrote:

Yes, sir I did receive it and court reporters have 60 days to prepare a transcript. So I've got yours in line to do it. It won't be 60 days for sure but I have to finish up the one I'm working on and then I try to do all the little ones I have before I start on another big one. So hopefully I can get it to you next week. I will keep you posted.

Pamela E. Green  
Circuit Court Reporter  
At-Large

From: mosi bundu <spinmas@yahoo.com>  
Sent: Tuesday, January 17, 2023 5:54 PM  
To: Green, Pamela E. <PGreen@sccourts.org>  
Subject: Re: Mosi Bundu v. Maria and Dean Youmans

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Assuming you received the money order for the transcript. Checking in to inquire about getting them.  
Respectfully

Sent from my iPhone

On Dec 30, 2022, at 6:05 PM, mosi bundu <spinmas@yahoo.com> wrote:

Thanks for the resend since this is a request outside of the request time. Concerning which I have to send request effort to the clerk and opposing counsel

On Friday, December 30, 2022 at 09:15:30 AM PST, Green, Pamela E. <pgreen@sccourts.org> wrote:

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Pamela E. Green  
Circuit Court Reporter  
At-Large

**Re: transcript request for 11-16-22**

spinmas@yahoo.com/Inbox



Amick, Lisa <lamick@sccourts.org>  
To: mosi bundu <spinmas@yahoo.com>

Dec 29, 2022 at 4:36 PM

My address is 7098 Jollystreet Road, Newberry, 29108.

Please make payment in the form of a money order.

Thank you,  
Lisa

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Thursday, December 29, 2022 11:55:06 AM  
**To:** Amick, Lisa <LAMick@sccourts.org>  
**Subject:** Re: transcript request for 11-16-22

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I am reaching out after receiving permission to proceed with my transcript request outside of the time frame to request them. Please send me an address and payment methods to obtain the transcript.

Respectfully,  
Mosi A Bundu  
206 B Kelly Street  
Laurens S.C. 29360  
864-340-7758/59

Sent from my iPhone

On Nov 25, 2022, at 3:37 PM, mosi bundu <spinmas@yahoo.com> wrote:

thanks.

On Friday, November 25, 2022, 08:39:54 AM PST, Amick, Lisa <lamick@sccourts.org> wrote:

There are no rules that apply to this request. You submit payment, I produce the transcript. That's how this works when requesting a transcript.

If you have any questions, you may contact my supervisor; Tabitha Jacob's at [tjacobs@sccourts.org](mailto:tjacobs@sccourts.org).

I thank you,  
Lisa Amick

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Friday, November 25, 2022 11:35:09 AM  
**To:** Amick, Lisa <LAMick@sccourts.org>  
**Subject:** Re: transcript request for 11-16-22

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Ma Amick, I have been looking at my previous request of transcripts. I am trying to mitigate cost as I did then around rule 607. I am looking to do this by request a disk of the electronic hearing or edited or unedited. Which ever method the rules allow for me to handle cost.

On Wednesday, November 23, 2022, 04:10:18 PM PST, Amick, Lisa <lamick@sccourts.org> wrote:

No there has not been a first request. I apologize for calling you ma'am, sir.

Lisa Amick

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Wednesday, November 23, 2022 6:59:42 PM  
**To:** Amick, Lisa <LAMick@sccourts.org>  
**Subject:** Re: transcript request for 11-16-22

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Has there been a first request for this transcript? I am a male ma'am...

On Monday, November 21, 2022, 12:38:08 PM PST, Amick, Lisa <lamick@sccourts.org> wrote:

Unfortunately, no ma'am. I can only estimate the number of pages the transcript will be.

If it helps, you can submit a down-payment of half of what I estimated which would be roughly \$59.00. Once the transcript is produced, I will send an invoice of the exact amount due less your down-payment and once I receive the difference I will send the transcript to you immediately.

Let me know if this is acceptable.

Thank you,  
Lisa Amick

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

From: mosi bundu <spinmas@yahoo.com>  
Sent: Monday, November 21, 2022 3:31:17 PM  
To: Amick, Lisa <LAMick@sccourts.org>  
Subject: Re: transcript request for 11-16-22

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Another thing, I am unsettled regarding an updated invoice, is there any way to know the number of pages and final cost upfront.

On Monday, November 21, 2022, 12:11:43 PM PST, Amick, Lisa <lamick@sccourts.org> wrote:

Hi Ms. Bundu,

Court Administration is supposed to assign someone to produce the transcript from the August hearing. You can follow up with them at [transcripts@sccourts.org](mailto:transcripts@sccourts.org).

I don't know anything about an abridged version of a transcript. Upon receipt of the amount estimated, I will produce the transcript and submit it to you as soon as possible.

Please let me know if you have any questions.

Thank you,  
Lisa Amick

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

From: mosi bundu <spinmas@yahoo.com>  
Sent: Monday, November 21, 2022 3:00:22 PM  
To: Amick, Lisa <LAMick@sccourts.org>  
Subject: Re: transcript request for 11-16-22

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Ms. Amick, I am just finding this email regarding my transcript request. I received a letter from court administrator about my not producing them. A hard copy letter of your response along with this email would have been preferable. I ordered transcripts before and understand that here is an abridged version that can be requested. Are you including the virtual court date I submitted, and if not why and where do I go to get those.

Respectfully Mosi A Bundu

864-340 7759/58

On Monday, October 24, 2022, 08:46:15 AM PDT, Amick, Lisa <lamick@sccourts.org> wrote:

Hi Ms. Bunder,

Please see the attached letter concerning your transcript request.

Let me know if you have any questions.

Thank you,  
Lisa Amick

----- CONFIDENTIALITY NOTICE ----- This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



CLARKSON | WALSH | COULTER

Attorneys at Law  
James P. Walsh, Esquire  
jwalsh@clarksonwalsh.com  
(864) 232-4400

March 17, 2023

**Via Certified Mail**

Mr. Mosi Bundu  
206B Kelly Street  
Laurens, SC 29360

Re: Mosi A. Bundu v. Maria Youmans and Dean Youmans  
Appellate Case No.: 2022-001454

Dear Mr. Bundu:

Please find attached, for service upon you, copies of Respondents' Motion to Dismiss with exhibit and Respondents' Memorandum in Opposition to Appellant's Motion for Continuance with exhibit, filed via email in the South Carolina Court of Appeals on this 17<sup>th</sup> of March, 2023.

Should you have any questions, please do not hesitate to contact us.

Yours very truly,

Clarkson, Walsh & Coulter, P.A.

Cathie A. Humberger  
Litigation Support Specialist

Enclosures



COPY

CLARKSON | WALSH | COULTER

Attorneys at Law  
James P. Walsh, Esquire  
jwalsh@clarksonwalsh.com  
(864) 232-4400

March 17, 2023

Via E-Mail

Jenny Abbott Kitchings, Clerk  
The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211  
ctappfilings@sccourts.org

Re: Mosi A. Bundu v. Maria Youmans and Dean Youmans  
Appellate Case No.: 2022-001454

Dear Ms. Kitchings:

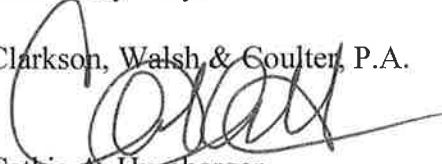
Please find attached Respondents' Motion to Dismiss with exhibit and Respondents' Memorandum in Opposition to Appellant's Motion for Continuance with exhibit for filing in the above-referenced matter, along with our Certificate of Service for same. By copy of this letter, Mr. Bundu is being served with same.

Our firm check number 83835 in the amount of \$50.00 in payment of the filing fee was mailed today via U.S. Mail.

As always, we appreciate your assistance in this matter. Should you have any questions, please do not hesitate to contact us.

Yours very truly,

Clarkson, Walsh & Coulter, P.A.



Cathie A. Humberger  
Litigation Support Specialist

Enclosures  
cc: (via Certified U.S. Mail)  
Mosi A. Bundu  
206 B Kelly St  
Laurens, SC 29360

COPY

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Judge

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reach him the next day. See Exhibit A. Mr. Bundu may be presumed to have received the transcript on January 28, 2023, or within a few days thereafter.

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As of the date of this motion, it has been over forty (40) days since January 28, 2023, and the Respondents have not been served with Mr. Bundu’s initial brief or designation of matter. Based on the foregoing, the undersigned counsel respectfully moves to dismiss Mr. Bundu’s appeal. As set forth above, he has failed to file an initial brief and designation of matter within the time prescribed by the South Carolina Appellate Court Rules. Therefore, in accordance with those rules, Mr. Bundu’s appeal should be dismissed.

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Respectfully submitted,



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James P. Walsh (15180) and  
John D. Harjehausen (76194)  
**Clarkson, Walsh & Coulter, P.A.**  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400 Phone  
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jwalsh@clarksonwalsh.com  
jharjehausen@clarksonwalsh.com

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Greenville, South Carolina  
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**SCANNED**

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*CAH*

**The South Carolina Court Of Appeals**

Post Office Box 11629  
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**Sent:** Friday, November 25, 2022 11:35:09 AM  
**To:** Amick, Lisa <LAMick@sccourts.org>  
**Subject:** Re: transcript request for 11-16-22

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Respectfully Mosi A Bundu

864-340 7759/58

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Hi Ms. Bunder,

Please see the attached letter concerning your transcript request.

Let me know if you have any questions.

Thank you,  
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COPY

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Judge

Laurens County

---

Case No. 2021-CP-30-00473  
Appellate Case No. 2022-001454

---

Mosi A. Bundu,

Appellant.

v.

Maria Youmans and Dean Youmans,

Respondents.

---

RESPONDENTS' MEMORANDUM IN  
OPPOSITION TO APPELLANT'S  
MOTION FOR CONTINUANCE

---

**Introduction**

On September 28, 2022, the *pro se* Plaintiff, Mosi A. Bundu, filed a Notice of Appeal from the Circuit Court's Order, dated August 28, 2022, dismissing the Plaintiff's complaint. On December 21, 2022, the Circuit Court issued an Order granting Plaintiff's motion to order the transcript of proceedings outside of the filing deadlines. On January 27, 2023, the Circuit Court Reporter mailed the transcript of proceedings to Mr. Bundu with the understanding that it would reach him the next day. See Exhibit A. Mr. Bundu may be presumed to have received the transcript on January 28, 2023, or within a few days thereafter. On February 25, 2023, Mr.

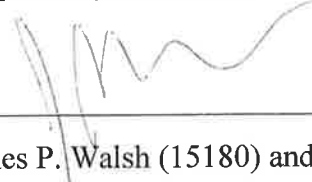
Bundu filed a motion for a continuance for the “maximum number of days allowed under the Sixth Amendment and rule 21b [*sic*]” while he seeks counsel.

### **Argument**

Pursuant to South Carolina Appellate Court Rule 208(a)(1), the appellant shall submit his initial brief on all parties to the appeal within thirty (30) days after receiving the transcript. Pursuant to Rule 208(4), SCACR, “[u]pon the failure of the appellant to file and serve his brief within the time prescribed, the clerk of the appellate court shall sign an order dismissing the appeal [...]” Mr. Bundu would have received the transcript on January 28, 2023, or within a few days thereafter. As of the date of this memorandum, it has been over forty (40) days since January 28, 2023, and the Respondents have not been served with the Mr. Bundu’s initial brief. Pursuant to Rule 240(b), SCACR, “[u]nless otherwise provided by these Rules, or ordered by the appellate court, the time limits imposed by these Rules shall not be stayed by the filing of a motion or petition [...]” Whereas Mr. Bundu’s filing of a motion for continuance does not stay the procedural deadlines, and whereas he has failed to serve his initial brief within the time limit prescribed by the Rules, Mr Bundu’s motion should not be granted and his appeal should be dismissed.

[Signature appears on following page.]

Respectfully submitted,



---

James P. Walsh (15180) and  
John D. Harjehausen (76194)  
**Clarkson, Walsh & Coulter, P.A.**  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400 Phone  
(864) 235-4399 Fax  
jwalsh@clarksonwalsh.com  
jharjehausen@clarksonwalsh.com

**ATTORNEYS FOR RESPONDENTS**

Greenville, South Carolina  
March 17, 2023

**SCANNED**

2/7/23

*CL*

**The South Carolina Court Of Appeals**

Post Office Box 11629  
Columbia , SC 29211  
1200 Senate Street  
Columbia, SC 29211

Jenny A. Riddings  
Clerk  
V. Claire Allen  
Chief Deputy Clerk

*Case# 2022-001454*

After notification of deficiencies in sending court reporter documents, appellant is resending email correspondings to oppposing council and the clerks office. Appellant is also sending these emails to the court administrators office.

Cc: James P. Walsh, Esquire  
John D. Harjehausen, Esquire  
1164 Woodruff Road  
Greenville South Carolina 29607  
02/02/2023

Appellant/ Pro Se Litigant

Mosi A. Bundu  
206 Kelly Street  
Laurens SC 29360

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Thursday, December 29, 2022 11:59 AM  
**To:** Green, Pamela E. <PGreen@sccourts.org>  
**Subject:** Re: Mosi Bundu v. Maria and Dean Youmans

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Ms Green, I am reaching out after obtaining permission to request transcripts out side for the time frame. Please send me payment information and an address to send the payment.

Respectfully,  
Mosi A. Bundu  
206 B Kelly Street  
Laurens S.C. 29360  
864-3407758/59

Sent from my iPhone

On Dec 7, 2022, at 10:44 AM, mosi bundu <spinmas@yahoo.com> wrote:

I did a mail search using your name, this is the only email from you. Could you tell me when you were notified of my request and by whom.

Thank you

On Tuesday, December 6, 2022, 01:34:45 PM PST, Green, Pamela E. <pgreen@sccourts.org> wrote:

Mr. Bundu,

Tammie Holmes said you did not receive my email about your transcript request. So I am forwarding this to you. Please read below for instructions on how to obtain this transcript.

**Pamela E. Green**  
Circuit Court Reporter  
At-Large

**From:** Green, Pamela E.  
**Sent:** Wednesday, November 23, 2022 9:49 AM  
**To:** spinmas@yahoo.com <spinmas@yahoo.com>  
**Cc:** Transcripts <transcripts@sccourts.org>  
**Subject:** Mosi Bundu v. Maria and Dean Youmans

Mr. Bundu,

I have been asked by Court Admin to prepare the above referenced transcript for a hearing date of 11/16/21 only.

I wanted to let you know the cost for this transcript. It looks like this hearing lasted for about 30 minutes. I can only give you an estimate of the page numbers. A 30 minute hearing is usually about 25 pages. The cost per page is \$4.25 per page. Also court reporters have 60 days to provide you a transcript.


If you wish to receive this transcript, you would need to mail \$106.25 to my address of PO Box 819 Reidville, SC 29375 and I will forward the transcript on to you when it is completed.

**Pamela E. Green**  
Circuit Court Reporter  
At-Large

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**Re: Mosi Bundu v. Maria and Dean Youmans**

spinmas@yahoo.c.../Inbox

 **Green, Pamela E.** <pgreen@sccourts.org>  
To: mosi bundu <spinmas@yahoo.com>

Jan 27 at 10:02 PM

Mr. Bundu,

I put your transcript in the mail today to you. It says it will be there tomorrow.

Best wishes to you.

**Pamela E. Green**  
Circuit Court Reporter  
At-Large

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Wednesday, January 18, 2023 11:07 PM  
**To:** Green, Pamela E. <PGreen@sccourts.org>  
**Subject:** Re: Mosi Bundu v. Maria and Dean Youmans

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Thanks

Sent from my iPhone

On Jan 17, 2023, at 6:49 PM, Green, Pamela E. <PGreen@sccourts.org> wrote:

Yes, sir I did receive it and court reporters have 60 days to prepare a transcript. So I've got yours in line to do it. It won't be 60 days for sure but I have to finish up the one I'm working on and then I try to do all the little ones I have before I start on another big one. So hopefully I can get it to you next week. I will keep you posted.

**Pamela E. Green**  
Circuit Court Reporter  
At-Large

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Tuesday, January 17, 2023 5:54 PM  
**To:** Green, Pamela E. <PGreen@sccourts.org>  
**Subject:** Re: Mosi Bundu v. Maria and Dean Youmans

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Assuming you received the money order for the transcript. Checking in to inquire about getting them.  
Respectfully

Sent from my iPhone

On Dec 30, 2022, at 6:05 PM, mosi bundu <spinmas@yahoo.com> wrote:

Thanks for the resend since this is a request outside of the request time. Concerning which I have to send request effort to the clerk and opposing counsel

On Friday, December 30, 2022 at 09:15:30 AM PST, Green, Pamela E. <pgreen@sccourts.org> wrote:

Here's what I sent you before.

I have been asked by Court Admin to prepare the above referenced transcript for a hearing date of 11/16/21 only.

I wanted to let you know the cost for this transcript. It looks like this hearing lasted for about 30 minutes. I can only give you an estimate of the page numbers. A 30 minute hearing is usually about 25 pages. The cost per page is \$4.25 per page. Also court reporters have 60 days to provide you a transcript.

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Circuit Court Reporter  
At-Large

**Re: transcript request for 11-16-22**

spinmas@yahoo.c./Inbox



**Amick, Lisa** <lamick@sccourts.org>  
To: mosi bundu <spinmas@yahoo.com>

Dec 29, 2022 at 4:36 PM

My address is 7098 Jollystreet Road, Newberry, 29108.

Please make payment in the form of a money order.

Thank you,  
Lisa

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

**From:** mosi bundu <spinmas@yahoo.com>  
**Sent:** Thursday, December 29, 2022 11:55:06 AM  
**To:** Amick, Lisa <LAMick@sccourts.org>  
**Subject:** Re: transcript request for 11-16-22

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I am reaching out after receiving permission to proceed with my transcript request outside of the time frame to request them. Please send me an address and payment methods to obtain the transcript.

Respectfully,  
Mosi A Bundu  
206 B Kelly Street  
Laurens S.C. 29360  
864-340-7758/59

Sent from my iPhone

On Nov 25, 2022, at 3:37 PM, mosi bundu <spinmas@yahoo.com> wrote:

thanks.

On Friday, November 25, 2022, 08:39:54 AM PST, Amick, Lisa <lamick@sccourts.org> wrote:

There are no rules that apply to this request. You submit payment, I produce the transcript. That's how this works when requesting a transcript.

If you have any questions, you may contact my supervisor, Tabitha Jacob's at [tjacobs @ sccourts.org](mailto:tjacobs@sccourts.org).

I thank you,  
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THE STATE OF SOUTH CAROLINA  
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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Judge

Laurens County

Trial Court Case No.

2021-CP-30-00473

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Appellate Case No. 2022-001454

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Mosi A, Bundu,

Appellant.

v.

Maria Youmans and Dean Youmans,

Respondents.

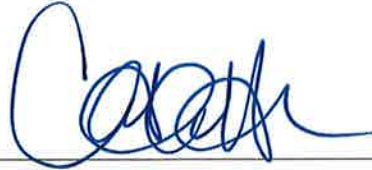
---

CERTIFICATE OF SERVICE

---

The undersigned hereby certifies that she is employed by the attorneys for Respondents and that she has served the *pro se* Appellant with a true and accurate copy of **Respondents' Motion to Dismiss and Memorandum in Opposition to Appellant's Motion for Continuance** by depositing a copy of the aforementioned documents in the United States Mail, Certified, First Class, in an envelope with due and proper postage affixed thereto and addressed as shown below, this 17<sup>th</sup> day of **March, 2023**:

Mosi A. Bundu  
206B Kelly Street  
Laurens, SC 29360



---

Cathie A. Humberger  
Litigation Support Specialist to  
James P. Walsh (15180) and  
John D. Harjehausen (76194)  
**Clarkson, Walsh & Coulter, P.A.**  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400 Phone  
(864) 235-4399 Fax  
jwalsh@clarksonwalsh.com  
jharjehausen@clarksonwalsh.com

**ATTORNEYS FOR RESPONDENTS**

Greenville, South Carolina  
March 17, 2023

**RECEIVED**

**Mar 17 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Judge

Laurens County

Trial Court Case No.

2021-CP-30-00473

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Appellate Case No. 2022-001454

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Mosi A, Bundu,

Appellant.

v.

Maria Youmans and Dean Youmans,

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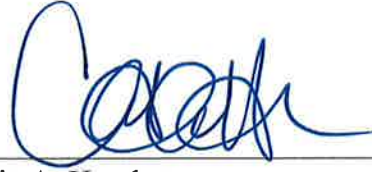
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Mosi A. Bundu  
206B Kelly Street  
Laurens, SC 29360



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Cathie A. Humberger  
Litigation Support Specialist to  
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**Clarkson, Walsh & Coulter, P.A.**  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400 Phone  
(864) 235-4399 Fax  
jwalsh@clarksonwalsh.com  
jharjehausen@clarksonwalsh.com

**ATTORNEYS FOR RESPONDENTS**

Greenville, South Carolina  
March 17, 2023



CLARKSON | WALSH | COULTER

Attorneys at Law  
James P. Walsh, Esquire  
jwalsh@clarksonwalsh.com  
(864) 232-4400

RECEIVED

Mar 17 2023

SC Court of Appeals

March 17, 2023

Via E-Mail

Jenny Abbott Kitchings, Clerk  
The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211  
ctappfilings@sccourts.org

Re: Mosi A. Bundu v. Maria Youmans and Dean Youmans  
Appellate Case No.: 2022-001454

Dear Ms. Kitchings:

Please find attached Respondents' Motion to Dismiss with exhibit and Respondents' Memorandum in Opposition to Appellant's Motion for Continuance with exhibit for filing in the above-referenced matter, along with our Certificate of Service for same. By copy of this letter, Mr. Bundu is being served with same.

Our firm check number 83835 in the amount of \$50.00 in payment of the filing fee was mailed today via U.S. Mail.

As always, we appreciate your assistance in this matter. Should you have any questions, please do not hesitate to contact us.

Yours very truly,

Clarkson, Walsh & Coulter, P.A.

  
Cathie A. Humberger  
Litigation Support Specialist

Enclosures  
cc: (via Certified U.S. Mail)  
Mosi A. Bundu  
206 B Kelly St  
Laurens, SC 29360

GREENVILLE - P.O. BOX 6728, GREENVILLE, SC 29606 • PHONE: 864-232-4400 • FAX: 864-235-4399

CHARLESTON - 497 ST. ANDREWS BLVD., CHARLESTON, SC 29407 • PHONE: 843-981-5180 • FAX: 843-388-7258

WWW.CLARKSONWALSH.COM