

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM AIKEN COUNTY
Courtney Clyburn Pope, Circuit Court Judge

APR 21 2023

SC Court of Appeals

Appellate Case Number 2023-000009
Case No. 2017-CP-02-1413

Otis Owens, Respondent,
v.

Michael Hunt, in his Official Capacity as Sheriff
of Aiken County, Aiken County Sheriff's Office,
Aiken County Detention Center, and Aiken County, Appellants.

**RESPONDENT'S REPLY TO APPELLANTS' RETURN IN OPPOSITION TO
RESPONDENT'S MOTION FOR ORDER TO MEDIATE**

The respondent respectfully files his reply to the appellants' return to the respondent's motion for an order to mediate.

The respondent has been trying to resolve this case for years. He has done everything in his power to urge the Aiken County Sheriff's Office to take responsibility for conduct that was witnessed by multiple people and unacceptable by anyone's standards. Notwithstanding those efforts, the Sheriff's Office forced a trial where opposing counsel objected over 120 times in five days, ending in a verdict of 10 times the highest amount ever offered by the Sheriff's office and

multiple times the last demand the respondent made. The respondent beat the offer of judgment he filed by \$50,000¹.

The respondent believes that mediation might be more fruitful now that a jury has returned a verdict in his favor. If a settlement were reached at mediation, it would bind the parties as long as they comply with SCRCP 43(k). It would also conserve time and expenses for both this Court and the parties. The respondent is willing to pay for the mediation, as long as the appellant mediates in good faith. There is nothing for the appellants to lose, and mediation is in the best interest of all parties. The respondent therefore respectfully requests that the Court of Appeals order the parties to mediate in good faith.

Respectfully Submitted,

Hawkins & Jedziniak, LLC

s/ Joshua T. Hawkins

Joshua T. Hawkins, S.C. Bar No. 78470
Helena L. Jedziniak, S.C. Bar No. 100825
Ethan L. Jedziniak, S.C. Bar No. 105785
1225 South Church Street
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Attorneys for Respondent

Greenville, South Carolina
April 18, 2023

¹ The respondent's motion for costs and interest was denied by the trial court, and the respondent chose not to appeal that issue in order to narrow the scope of the issues before this Court.

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Otis Owens, Respondent,
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Michael Hunt, in his Official Capacity as Sheriff
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Aiken County Detention Center, and Aiken County, Appellants.

PROOF OF SERVICE

I certify that I filed Respondent's Reply to Appellants' Return in Opposition to Respondent's Motion to For an Order to Mediate, with the South Carolina Court of Appeals, (*electronically via ctappfilings@sccourts.org*), and served a copy upon Appellants Michael Hunt, Aiken County Sheriff's Office, Aiken County Detention Center, and Aiken County (*via electronic mail to their attorneys of record: w davidson@dml-law.com, andrew@ldlawsc.com*), and to the South Carolina Court of Appeals Clerk of Court, by depositing a copy of it in the United States Mail, postage prepaid, on April 18, 2023, addressed to 1220 Senate Street, Columbia, SC.

Space left intentionally blank. Please see signature block to follow.

Hawkins & Jedziniak, LLC

s/ Joshua T. Hawkins

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Attorneys for Respondent,

Greenville, South Carolina
April 18, 2023

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

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

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Michelle M. Hurley, Family Court

Appellate Case No. 2022-000771

RECEIVED

APR 21 2023

SC Court of Appeals

Angela Holloman,

Respondent,

v.

Enoch Walters,

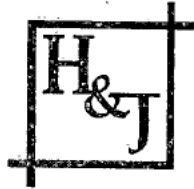
Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant's Answer to Dismiss Appeal on Angela Holloman by providing a copy of it in person, on April 5, 2023, addressed to her attorneys of record, J. Michael Taylor, at 2231 Devine Street, Suite 202, Columbia, South Carolina 29205 and Yulee Elvington Harrelson at 1720 Main Street, Suite 103, Columbia, SC 29201.

April 20, 2023

s/Enoch Walters
Enoch Walters
148 Flagstone Way
Lexington, SC 29072
(803) 261-9282



Hawkins & Jedziniak, LLC

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SC Court of Appeals

April 18, 2023

--via U.S. Mail and electronic filing: ctappfilings@sccourts.org--

Jenny Abbot Kitchings

Clerk of Court

South Carolina Court of Appeals

1220 Senate Street

Columbia, SC 29201

RE: *Otis Owens v. Michael Hunt, et al.*

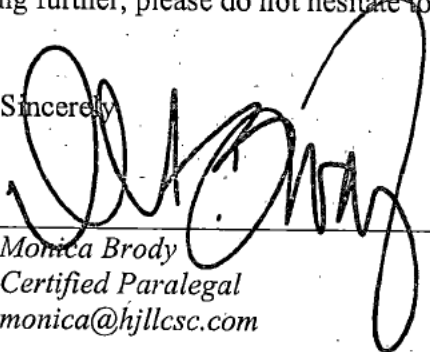
Appellate Case No.: 2023-000009

Dear Ms. Kitchings,

Please find enclosed for filing, Respondent's Reply to the Appellants' Return to the Respondent's Motion for an Order to Mediate, in the above-captioned case, along with Proof of Service upon Appellants.

Should the Court have any questions, or need anything further, please do not hesitate to contact our office.

Sincerely,



Monica Brody
Certified Paralegal
monica@hjllesc.com

Enclosures

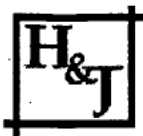
CC:

--via electronic mail and U.S. Mail:

William H. Davidson, II: w davidson@dml-law.com

Andrew F. Lindemann: andrew@ldlawsc.com

Attorneys for Appellants



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THE SOUTH CAROLINA COURT OF APPEALS
ATTN: JENNY ABBOTT KITCHENS, CLERK OF COURT
1220 SENATE STREET
COLUMBIA SC 29201

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