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**Feb 01 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Jennifer McCoy, Circuit Court Judge

Appellate Case No. 2021-001183

Joe Clemons,..... Appellant,

v.

Peggy H. Pinnell Agency, Inc., Peggy H. Pinnell Insurance Agency Inc.,  
State Farm Life Insurance Company, (jointly and severally liable),  
..... Respondents.

**RESPONDENTS' RETURN IN OPPOSITION TO APPELLANT'S MOTION FOR  
DISMISSAL, REMOVAL OF RESPONDENT AND THEIR DEFENSE  
& ABEYANCE REQUEST**

WHELAN MELLEN & NORRIS, LLC

By: s/ Charles R. Norris  
Charles R. Norris  
SC Bar No. 004238  
E-Mail: charles@whelanmellen.com  
89 Broad Street  
Charleston, SC 29401  
(843) 619-3824

*Attorneys for Respondents*

Charleston, South Carolina

February 1, 2024

Respondents Peggy H. Pinnell Insurance Agency, Inc. and State Farm Life Insurance Company oppose Appellant’s *Motion for Dismissal, Removal of Respondent and Their Defense, & Abeyance Request* (the “Motion”), filed January 29, 2024, which requests the Court “demand a withdrawal of respondent and all his falsified and concocted defense and grant [Appellant] victory base on the facts and laws and truth with the proof that will make it a fact,” (Mot. at 2) and “hold in abeyance until there is a ruling on this motion,” (Mot. at 3). First, the allegations and accusations set forth in the Motion, whether concerning Respondents, their counsel, the judiciary, or otherwise, are frivolous and denied by Respondents. Second, there are no authorities cited in support of the Motion, which is likewise frivolous and without a legal basis. Respondents request the Court reject Appellant’s “because I said so” grounds for relief and deny the Motion.

Respectfully submitted,

WHELAN MELLEN & NORRIS, LLC

By: *s/ Charles R. Norris* \_\_\_\_\_

Charles R. Norris  
S.C. Bar No. 004238  
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..... Respondents.

**PROOF OF SERVICE**

I certify that **RESPONDENTS' RETURN IN OPPOSITION TO APPELLANT'S MOTION FOR DISMISSAL, REMOVAL OF RESPONDENT AND THEIR DEFENSE & ABEYANCE REQUEST** has been served on Appellant by electronic service on February 1, 2024, as reflected in the email attached hereto, sent to the following email address:

Joe Clemons, Pro Se  
[clemonswelding1@gmail.com](mailto:clemonswelding1@gmail.com)

WHELAN MELLEN & NORRIS, LLC

By: s/ Charles R. Norris  
Charles R. Norris  
SC Bar No. 004238  
E-Mail: charles@whelanmellen.com  
89 Broad Street  
Charleston, SC 29401  
(843) 619-3824

*Attorneys for Respondents*

Charleston, South Carolina  
February 1, 2024

## Traci Corallo

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**From:** Traci Corallo  
**Sent:** Thursday, February 1, 2024 10:40 AM  
**To:** 'clemonswelding1@gmail.com'  
**Cc:** Charles Norris  
**Subject:** Clemons v. Peggy H. Pinnell Agency, Inc., et al. - Appellate Case No. 2021-001183  
**Attachments:** Clemons - Respondants' Return in Opposition to Motion for Dismissal.pdf; Clemons - Proof of Service for Dismissal.pdf

Attached please find the following documents for service upon you:

1. Respondents' Return in Opposition to Appellant's Motion for Dismissal, Removal of Respondent and Their Defenses
2. Proof of Service

Thank you.



**Traci Corallo**  
**WHELAN MELLEN & NORRIS, LLC**  
(561) 351-0967 | [whelanmellen.com](http://whelanmellen.com)