

Mar 13 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA)
COUNTY OF BERKELEY)
JOE CLEMONS)
)
)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
Civil Action No. 2019-CP-08-00424

Plaintiff,

**JOE CLEMONS
DEFENDANTS'**

PLAINTIFF RESPONSE TO

Vs.)

OMNIBUS MOTION IN LIMINE

)
)
)
PEGGY H. PINNELL, AGENCY, INC)
PEGGY H. PINNELL INSURANCE)
AGENCY, INC. STATE FARM LIFE)
INSURANCE COMPANY, (jointly)
and Severally liable),)
Defendant)

I Joe Clemons, in response to Mr. Norris’s above motion that all my complaints that I may bring up is omnibus or a lot of difference issues that have on limine or having no bearing or impact on the essential facts and purpose of this case. Mr. Norris is saying this because he is the CAUSER, of these issues, that need to be addressed, in his attempts to change the facts and cover up things that have been illegally done in this case. Mr. Norris is so BOLD, that he even mentions 6 of them, which that is just some of those things that took place in this case. Also Mr. Norris talk about the relevancy of these things that took place in this case, but he wants to bring back the deposition of Mr. Charles Walker, of A I G insurance co., as to testify against me and which have no relevance in this case, and which he has stated, that a deposition is hearsay. Your Honor, Mr. Norris is the one that is trying to block all the proof and evidence that I have, because he has nothing, and only trying to stop my offense, because he has no defense. Your Honor, because of these things Mr. Norris Motion should be denied. Your Honor, if Mr. Norris

has nothing to hide, and all those people that he has stated that the transcripts, of hearings and depositions are accurate, and I'm so unpled why don't we just listen to the audios of those recording, which is my two smoking guns, and I have a judicial right, and I have put in motions and requested. Humbly Submitted:

By: Joe Clemons Pro Se Litigant/Apologist E-mail: clemonswelding1@gmail.com 2202 Addidas St. Eutawville, SC 29048