

Joe Clemons

Plaintiff(s)

vs.

William S. Helmly / Home Telecom

Defendant(s)

Submitted By: Joe Clemons
Address: 2202 Addidas St
Eutawville, SC 29048

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

Pro-Se843-753-7007ClemonsWelding@gmail.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

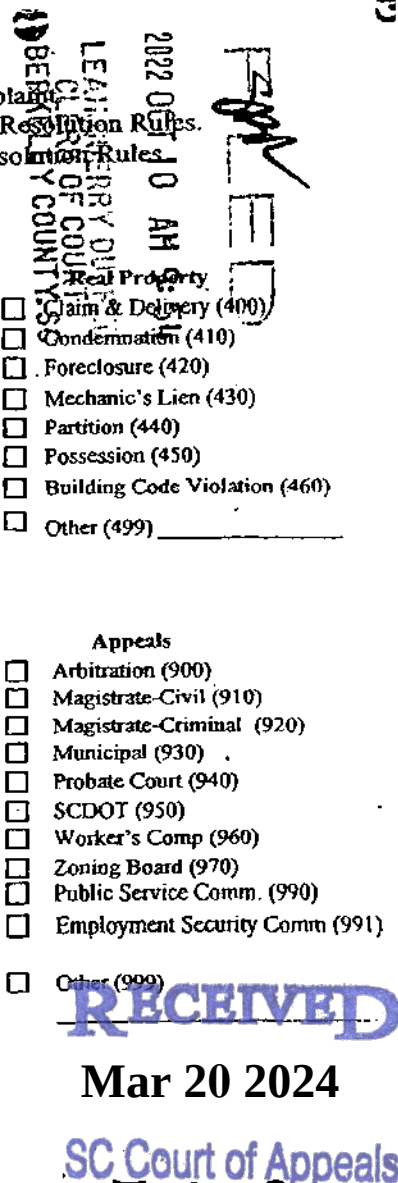
- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.
- ☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☐ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|--|--|--|--|
| Contracts
☐ Constructions (100)
☐ Debt Collection (110)
☐ General (130)
☐ Breach of Contract (140)
☒ Fraud/Bad Faith (150)
☐ Failure to Deliver/Warranty (160)
☐ Employment Discrim (170)
☐ Employment (180)
☐ Other (199) | Torts - Professional Malpractice
☐ Dental Malpractice (200)
☐ Legal Malpractice (210)
☐ Medical Malpractice (220)
Previous Notice of Intent Case #
20 <u>-NI-</u>
☐ Notice/ File Med Mal (230)
☐ Other (299) | Torts - Personal Injury
☐ Conversion (310)
☐ Motor Vehicle Accident (320)
☐ Premises Liability (330)
☐ Products Liability (340)
☐ Personal Injury (350)
☐ Wrongful Death (360)
☐ Assault/Battery (370)
☐ Slander/Libel (380)
☐ Other (399) | Real Property
☐ Claim & Delivery (400)
☐ Condemnation (410)
☐ Foreclosure (420)
☐ Mechanic's Lien (430)
☐ Partition (440)
☐ Possession (450)
☐ Building Code Violation (460)
☐ Other (499) |
| Inmate Petitions
☐ PCR (500)
☐ Mandamus (520)
☐ Habeas Corpus (530)
☐ Other (599) | Administrative Law/Relief
☐ Reinstate Drv. License (800)
☐ Judicial Review (810)
☐ Relief (820)
☐ Permanent Injunction (830)
☐ Forfeiture-Petition (840)
☐ Forfeiture-Consent Order (850)
☐ Other (899) | Judgments/Settlements
☐ Death Settlement (700)
☐ Foreign Judgment (710)
☐ Magistrate's Judgment (720)
☐ Minor Settlement (730)
☐ Transcript Judgment (740)
☐ Lis Pendens (750)
☐ Transfer of Structured Settlement Payment Rights Application (760)
☐ Confession of Judgment (770)
☐ Petition for Workers Compensation Settlement Approval (780)
☐ Incapacitated Adult Settlement (790)
☐ Other (799) | Appeals
☐ Arbitration (900)
☐ Magistrate-Civil (910)
☐ Magistrate-Criminal (920)
☐ Municipal (930)
☐ Probate Court (940)
☐ SCDOT (950)
☐ Worker's Comp (960)
☐ Zoning Board (970)
☐ Public Service Comm. (990)
☐ Employment Security Comm (991)
☐ Other (999) |
| Special/Complex /Other
☐ Environmental (600)
☐ Automobile Arb. (610)
☐ Medical (620)
☐ Other (699)
☐ Sexual Predator (510)
☐ Permanent Restraining Order (680)
☐ Interpleader (690) | ☐ Pharmaceuticals (630)
☐ Unfair Trade Practices (640)
☐ Out-of State Depositions (650)
☐ Motion to Quash Subpoena in an Out-of-County Action (660)
☐ Pre-Suit Discovery (670) | | |

Submitting Party Signature: Joe ClemonsDate: 10-7-2022

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.



STATE OF SOUTH CAROLINA)

COUNTY OF BERKELEY)

Joe Clemons)

Plaintiff,)

vs.)

William S. Helmly, President & CEO,
Home Telecom Company,
(jointly and severally liable),)

Defendants.)

IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

CASE NO. 2022 CP-08-02427

SUMMONS

2022 OCT 10 AM 9:54
LEAH GUERRY DUPREE
CLERK OF COURT
BERKELEY COUNTY, SC

FILED

TO DEFENDANT ABOVE NAMED: and required to answer the Complaint in this action, a copy of which is herewith served upon you, and serve a copy of your Answer to the said Complaint on the Plaintiff/Pro Se Litigant Apologist, Joe Clemons, 2202 Addidas Street, Eutawville, SC 29048, within thirty (30) days after the service hereof, exclusive of the day of service, and if you fail to answer the Complaint with the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

Joe Clemons
10-7-2022

Joe Clemons
Pro Se Litigant Apologist
2202 Addidas Street
Eutawville, SC 29048
(843) 753-7007
(843) 906-1133 (Cell)
clemonswelding1@gmail.com

Pro Se Plaintiff

cc: g.c.

STATE OF SOUTH CAROLINA
COUNTY OF BERKELEY

Joe Clemons,
Plaintiff,

vs.

William S. Helmly, President & CEO,
Home Telecom Company
(jointly and severally liable),

Defendants.

IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

CASE NO. 20-22-CP-08-02427

COMPLAINT

2022 OCT 10 AM 9:54
LEAH GUERRY JUDGE
CLERK OF COURT
BERKELEY COUNTY, SC

FILED

TO: THE DEFENDANTS ABOVE NAMED

The Plaintiff, **Joe Clemons**, by and through himself as Pro Se Litigant/Apologist, complaining of the Defendants would respectfully show the court as follows:

PARTIES, JURISDICTION, AND VENUE

1. That **Joe Clemons** (hereinafter "Plaintiff") is a resident of Eutawville, SC, organized under the laws of Orangeburg County and the State of South Carolina.
2. That the Defendants, **William S. Helmly CEO of Home Telecom, Home Telecom Co.** (hereinafter collectively referred to as "Defendant") upon information and belief, are licensed in South Carolina, as Home Telephone, LLC, doing business as Home Telecom Communications Services, and is organized under the laws of Berkeley County and the State of South Carolina.
3. That this Court has jurisdiction over the parties and subject matter of this action.
4. That at all times relevant herein the Defendants were acting by and through its duly qualified and authorized agents, employees, officers and/or directors, who were acting within the scope of authority in the court of their employment.

FACTUAL BACKGROUND

5. That the Plaintiff has been a customer with Defendant for over thirty (36) years.

- 6/7. That Defendant is a licensed and registered communication company who has been the Plaintiff's only land line communication provider for over thirty-six (36) years.
- 7/8. That in March of 2018, Plaintiff went to Home Telecom office to request a detail record of all calls that was made, by his land line number 843-753-7007, from March 1, 2017 to May 31, 2017.
- 8/8. That the copy of the detail calls record that was requested, had all the calls that was made, only all the calls that was made to State Farm Insurance Company Corp. offices, and all the calls made to Mrs. Peggy Pennell's local agency was missing, from March to May, that I needed to prove that I spoke to certain people on certain days.
- 9/10. That the calls made to State Farm Corp. Offices and Mrs. Pinnell local office was confirm and validated, by State Farm and Mrs. Pinnell by letters and statements from them.
- 10/11. That on March 18, 2020, (after going to Home Telecom on three (3) different occasions requesting, complaining, and telling them about the letters and proofs that I have to show that calls was made) Home Telecom sent me a letter stating that there is nothing wrong with their system and the copy of calls are accurate.
- 11/12. That on May 25, 2021, Mr. William Helmly was deposed and under oath stated that Peggy Pinnell was his neighbor and if any calls was made on my land line phone it is permanently recorded on their database or server.
- 12/13. That State Farm sent a CD recording of the calls made on May of 2021, to the Department of Insurance, proving that the calls were made by my land line phone number, but Home Telecom detail copy of my calls did not record or find those calls.

FOR A FIRST CAUSE OF ACTION
Breach of Contract

- 13 ~~19~~ That Plaintiff incorporates the allegations of paragraphs (1) through (12) above as if fully set forth verbatim.
- 14 ~~20~~ That a valid service contract exists between the Plaintiff and Defendant from June 1985 to present.
- 15 ~~21~~ That valuable considerations in terms of monies paid were being made to Home Telecom in exchange for Defendant's agreement to issue communication service.
- 16 ~~22~~ That Plaintiff has fulfilled all his obligations that were to be performed including paying of the monthly service charges.
- 17 ~~23~~ That Defendant failed to and refused to provide the Plaintiff an accurate detailed copy of his telephone record as requested by the Plaintiff during the period of March 1, 2017 to May 31, 2017 and again in May 2021. Defendant fraudulently and intentionally withheld, denied and omitted calls that were made.
- 18 ~~24~~ That Defendant has failed and refused to provide the accurate detailed copy of the telephone record and fraudulently supplied inaccurate telephone records, all while continuing to accept payment and fee from Plaintiff.
- 19 ~~25~~ That Defendant has therefore breached the contract.
- 20 ~~26~~ That these breaches were fraudulent, substantial and material.
- 21 ~~27~~ As a direct and proximate result of the Defendant's breach, the Plaintiff has been damaged in the amount of and is entitled to recover damages of ongoing expenses, costs, pain and suffering, punitive damages, Pro Se fees, interest, and such other incidental and consequential damages as related to the invasion of privacy.

FOR A SECOND CAUSE OF ACTION
Breach of Fiduciary Duty

- 22 ~~28~~ That Plaintiff incorporates the allegations of paragraphs (1) through (21) above as if fully set forth verbatim.

23 30. That as a communications company, Defendant accepted the fiduciary duty to provide communication as an honest fair-dealing provider to all current and potential customers.

24 31. That Plaintiff has been a customer with Defendant for over 36 years.

25 32. That valuable considerations in terms of monies paid were being made to Home Telecom in exchange for Defendant's accurate and reliable service.

26 33. As a direct and proximate result of the Defendant's breach, the Plaintiff has been damaged in the amount of and is entitled to recover damages of ongoing expenses, costs, pain and suffering, punitive damages, Pro Se fees, interest, and such other incidental and consequential damages as related to the invasion of privacy.

FOR A THIRD CAUSE OF ACTION
Negligence

27 34. That Plaintiff incorporates the allegations of paragraphs (1) through (26) above as if fully set forth verbatim.

28 35. That Defendant worked in collaboration to deny Plaintiff the proof needed to win his case against State Farm.

29 36. That valuable considerations in terms of monies were paid to Home Telecom in exchange for Defendant to issue accurate telephone records.

30 37. That Defendant owed a duty to act responsibly and reasonably in their communications with Plaintiff and others and in the denial and/or alternative options of the service, and to act responsibly reasonably in accordance with the contract and to properly record telephone call history.

31 38. That Defendants failed to do so and have breached those duties, including but not limited to in the following particular:

- 32
- a. Failing to notify Plaintiff of reasons for the denial of his accurate phone records
 - b. Failing to notify Plaintiff as to other alternatives to get his accurate phone records retrieved from Defendant's server database;
 - c. Failing to ensure Plaintiff's protection by allowing agents or members of Defendant to intentionally and fraudulently supply inaccurate phone record;
 - d. Failing to reimburse Plaintiff for supplying inaccurate phone records. The records Defendant provided omitted call records between Plaintiff and various State Farm agents between arch 1 2017 to ay 31 2017 and ay 1 2021 to ay 31 2021;
 - e. Failing to have in place adequate policies and procedures to protect their customers; and
 - f. Other such particulars as may be shown at trial.
- 32 42. As a direct and proximate result of the Defendant's negligence, the Plaintiff has been damaged in the amount of and is entitled to recover damages of ongoing e penses costs pain and suffering punitive damages Pro Se fees interest and such other incidental and conse uential damages as related to the invasion of privacy.

FOR A FOURTH CAUSE OF ACTION
Negligent Misrepresentation

- 33 43. That Plaintiff incorporates the allegations of paragraphs (1) through (32) above as if fully set forth verbatim.
- 34 44. That Defendant made multiple false representations to the Plaintiff, outside of the contract, regarding his status as a customer of over 3 years.
- 35 45. That the Defendant had personal interest in making false representations, namely producing inaccurate phone call records to Plaintiff without his knowledge and/or consent, all in furtherance of the personal relationship at the detriment of the customer.
- 36 46. That the Defendant owed duties of care to the Plaintiff, as a reasonable person, to see that truthful information was communicated to the Plaintiff.
- 37 47. That the Defendant breached those duties by failing to exercise due care with regard to Plaintiff.
- 38 48. That the Plaintiff justifiably relied on the representations that Defendant should have made.
- 39 49. That Plaintiff has suffered pecuniary losses as a direct and proximate result of reliance on Defendant's accurate representations.
- 40 50. As a direct and proximate result of the Defendants' negligent misrepresentation, the Plaintiff has been damaged in the amount of and is entitled to recover damages of ongoing e penses costs pain and suffering punitive damages Pro Se fees interest and such other incidental and conse uential damages as related to the invasion of privacy.

FOR A FIFTH CAUSE OF ACTION
Constructive Fraud

- 42 ~~63~~. That Plaintiff incorporates the allegations of paragraphs (1) through (40) above as if fully set forth verbatim.
- 42 ~~64~~. That in the event that the conduct of the Defendant should be determined to lack honesty of purpose or intent to deceive, the Plaintiff alleges that the Defendant knew or should have known that their conduct and representations were misleading the Plaintiff and that accordingly their conducts and representations constituted constructive fraud.
- 43 ~~65~~. That by Defendant intentionally not disclosing and/or withholding from the Plaintiff the fact that the records lacked an accurate representation, it is reasonable for one to assume that the omission of such fact was purposed with the intent that Plaintiff would believe the document was accurate and would stop his pursuit.
- 44 ~~66~~. That the Defendant and State Farm collaborated to withhold accurate records and proof, which is considered an obstruction of justice.
- 45 ~~67~~. As a direct and proximate result of the Defendant's constructive fraud, the Plaintiff has been damaged in the amount of and is entitled to recover damages of ongoing expenses, costs, pain and suffering, punitive damages, Pro Se fees, interest, and such other incidental and consequential damages as related to the invasion of privacy.

FOR A SIXTH CAUSE OF ACTION
Civil Conspiracy

- 46 ~~68~~. That Plaintiff incorporates the allegations of paragraphs (1) through (45) above as if fully set forth verbatim.
- 47 ~~70~~. That the Defendant combined in an unlawful manner, for an improper purpose, to cause harm to Plaintiff.
- 48 ~~71~~. That as a result of the Defendant's actions constituting civil conspiracy, the Plaintiff has suffered special damages.
- 49 ~~72~~. As a direct and proximate result of the Defendant's actions, the Plaintiff has been damaged in the amount of and is entitled to recover damages of ongoing expenses, costs, pain and suffering, punitive damages, Pro Se fees, interest, and such other incidental and consequential damages as related to the invasion of privacy.

FOR A SEVENTH CAUSE OF ACTION

Punitive Damages

- 9c
50 ~~82~~. That Plaintiff incorporates the allegations of paragraph (1) through (49) above as if fully set forth verbatim.
- 61 ~~83~~. That Plaintiff is entitled to receive from Defendant all monies paid for punitive damages and any other payments made as a result of the negligence of Defendant resulting in Plaintiff injuries and death, and Plaintiff is entitled to such as the trier of fact shall determine.

FOR AN TENTH CAUSE OF ACTION

Attorney Fees

- 52 ~~84~~. That Plaintiff incorporates the allegations of paragraph (1) through (51) above as if fully set forth verbatim.
- 53 ~~85~~. That Plaintiff has represented himself and is entitled to receive from Defendant all monies paid for attorney fees and any other payments made for bringing this action as well as their own attorney fees, should they require representation by counsel.

WHEREFORE, the Plaintiff prays this Honorable Court enter Judgment against the Defendant in favor of the Plaintiff, jointly and severally, as follows:

1. A trial by jury;

2. For actual, direct, indirect, special, resulting and consequential damages against the Defendants, jointly and severally, in an amount to be determined;
3. For punitive damages in an amount to be determined by the trier of fact;
4. For prejudgment interest and post judgment interest;
5. For all reasonable attorneys' fees and costs associated with this action;
6. For discovery under Code of Laws of South Carolina and the Rules of Civil Procedure.
7. For all other relief this Honorable Court deems just and proper.

Joe Clemons
Pro Se Litigant Apologist
2202 Addidas Street
Eutawville, SC 29048
(843) 753-7007
(843) 906-1133 (Cell)
clemonswelding1@gmail.com

Joe Clemons
10-7-2022

March 18, 2020

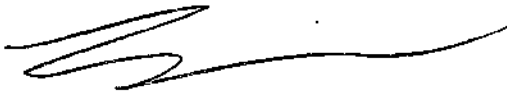
Joe A. Clemons
2202 Addidas Street
Eutawville, SC 29048

Dear Mr. Clemons,

This letter is to inform you that Home Telecom has reviewed our internal systems, processes, and controls. We have found no evidence of external or internal intrusion or tampering in our systems. We believe the data we provided to you in March of 2018 is complete and accurate.

We have spent considerable time, effort, and expense in conversation with you and in investigating per your request. Any subsequent requests related to this issue will require a valid subpoena.

Sincerely,



William S. Helmly
President & CEO
Home Telecom

Exhibit 2

[illegible]

What was in that place.

153 Policyowner/Insured, Joe Clemons, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan

10 yr certifi Belinda Policyowner/Insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.6%. Int rate is variable. Trans to Belinda, for assistance with annuitization.

Policy 2805-9038 2573-9762 Agent, Peggy Pinell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol. can't add WPD rider to this 15 pay life. could do a COP to a 20 yr life to add WPD, would be fully underwritten and needed signed since RL noted yes WPD but couldn't be issued on pol w/o app and und.

STINA WYNDHAM, 40-1913, 1134665336 wants to reinstate, 70.90, 4/15 A/S CHRISTINA WYNDHAM, 40-1913 112805-9088, cash value

STINA WYNDHAM, 40-1913 walked her to paid in advance tool thru abs for a new business app she wasn't 100% sure of the amount or coverage that was desired wanted current tli emailed to her at (1A3V)

on, Policyowner/Insured verified by telr 1 regarding decreasing the DB and how that will affect the CV earning in the future. LF-2806-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run for other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

Una called 40-1913, advised that how the dividends work. Current option is accum. advised that dividends sit on policy as cash and earn interest. They can be taken out at any time, or they are paid to heirs at the death of 60 in addition to the face amount. They are a separate number from the cash value, which is the value of the base policy.

Jemons verified request in force illustration to be mailed, verified address.

ted in regarding why he did not get WPD. Advised on the original app (2573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to Rheumatoid Arthritis. She had specific questions, so I let him call his agent for further assistance.

This never happen, a big lie, and what is the def the rate

STINA WYNDHAM, 40-1913, calling in regards to seeing why the WPD was declined. RA

GY PINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the PO/Pi applied for WPD. Advised that previous rep that spoke to PO/Pi advised that it was not on original app but when the PO/Pi did a version on this policy the request was to have WPD. There is a signed AMD on this policy that advised PO/Pi was aware that they loved without WPD. Sent AO copy of RL submitted with WPD requested.

ont, PO verified, 1/28/2008 commonwealth. email.com. Joe Clemons, PO verified, LF-2805-9088 Asking if WPD was on policy, adv, no, adv. There is a signed AMD stating it issued with no WPD. Asking how much approx. would PO have at 15 years of having policy \$95,081. Cash value after 15 years \$180,058. Based on what PO pays now and at the end of 15 years will have paid \$152,450. Joe Clemons, PO verified, LF-2806-1344 Called At the end of the 15 years what will be approx. cash value: \$28,039.00 and accum dividends: \$2052.00. Based on what PO pays now and at the end of 15 years PO will have paid \$31,321.00

ons, PO LF-2805-9088 received a sup. Esc. PO is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once TC was issued. Per notes Jack life never signed app and then put it on there on TC app and was denied. I explained would get to a T/L to review and see what we can do and follow up with him.

mons, JINSO, spoke w/ Patrick Daniels yesterday, he said Patrick called him back and requested that he call in. I adv. Can't assist with his policy since I am in the Health Response Center, I can get him to a supervisor but not for a call. I could get him to the LRC to assist. He disconnected the call.

STINA WYNDHAM, 40-1913, calling to see what a supervisor advised the notes that were left from the supervisor. I also advised that it is subject to underwriting he may be approved and he may not be approved.

GY PINNELL, 40-1913 are wa able/willing to write a letter to the PI from our legal department to advise that the contract on the original term application LF-2573-9762 and TC app existing policy LF-2805-9088 are legally documents and that we cannot make an exception to go back and add WPD, even if new policy LF-3597-7997 has the rider? The agents is being harassed and has been threatened with legal action, looking for guidance or a to effectively silence the insured (readable)

ont, PO called because the number was on his caller ID. Located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left with her direct number, which do not have access to. He was driving and didn't check his messages, just called the number that showed on his caller ID.

mons LF-2805-9088 FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.6% on his annual notice. 1/28061344/AUAS - SR4P for WPD claim. Wanting to Public Affairs?

ADVIS - PO verified LF-2805-9088 - Total accum divs = \$19,551.53, loan wtd = \$49,348.32, no rc. Variable 5% interest rate. Interest accrues daily but billed once a yr on anniv. Thinking abt taking \$25K. Advised \$25 of \$25K is 1,250 that would be billed in interest. This does not assume loan payments are being made. If pymts made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified guaranteed CV rate. AN statement shows accum divs at 2.5%. Was in the middle of explaining that accum divs do not equal or affect the CV so exams at a diff percentage (current/guaranteed) - phone cut out in middle of 60 call back phone 8.

ADVIS confirmed PO LF-2805-9088 confirmed \$19,551.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per proposal Act less than 3% and currently earn 3.6% loan interest 5% per current rates and non-guaranteed values.

CLARK KESLEY, 40-13397, wanting to know the interest rate on the loan, adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.6%.

MONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anniv (6/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anniv (8/22/18), will be around 8/1, no divs currently.

MONS PO verified, LF-2805-9088 PO wanted the CSV 74728.95 1G60 eff 5/7/18 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the illustration - he is certain he saw something that said it could be as much as 6%. But he is not able to locate the paper. Found revised illustration in Imaging 7/7/18. He wanted a copy of the revised illustration to be faxed to 11343-751-7024 - SR to SBC-WKREQ-LRC-APD **TAPD RE: PO is requesting a copy of the RBI generated 07/07/2010 in ISET, but a regular FPR w/no changes should display the same information. Please mail to address. Faxing the illustration may not follow our guidelines. Will be mailed to address on file.

GY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an to try to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2006. Sent Siebel email to CLAIMS

MONS verified as PO find out what the values in my life insurance. 1/28061344 1159.05 accumulated dividends; 11,174.27 available as a loan. 1/35977997 31.50 accumulated dividend \$15,414.61 1/28059088 \$16,009.50 also dividends; 587,586.93 available as a loan. 84061.45 Once terminated it can not be reinstated and there is no taxable gain.

LEMONS verified, LF-28059088, 15 PL; loan available as of 4/18/19 Maximum loan available: \$67,594.51. Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO inform of advised by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO

MONS, PO verified, LF-2805-9088 wanting to know what divs are adv for him to take but. I adv there are accums of \$18,039.50. I adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent selection line. LF-2806-1344 wanting to know what funds are adv on the policy. I adv there are accums of \$1,159.05, and a loan adv of \$11,347.71. I adv should request through agt

MONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be comp'd I advised PO that I would send request up to a TM to verify what was ng with req to change servicing agt as per tfo note 02-25 any contact by PO needs to be sent to Compliance Rachel Gomes (QSHQ) sent Siebel e mail

CLEMONS verified - lost this call when trying to get the number to Agent Assignment.

GY PINNELL, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

EGGY PINNELL (40-1913) called for the special monthly premium with WPD, I advised approximately \$882.65.

STINA WYNDHAM, 40-1913, 1/28059088 transferred to life compliance.

333 A/S MELISSA OWANS, 40-1913, calling to state agt is requesting copy of rbi from 7/7/2010 be emailed to her. emailed to a/s

VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

2805-0088 Policyowner/Insured, Joe Clemons, called to value back out and not have a loan but still have a paid up policy advised the 28050088 10 yr certain Belinda Policyowner/Insured loan is deducted from death benefit. Advised loan not billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.67%. Int rate is variable. Trans to Belinda, Values floor or assistance with annuitizing.

40-1913 Peggy 2805-9088 2573-9762 Agent, Peggy Pinelli (40-1913), called about WPD not on policy. When pol converted from 2573-9762 was not a rider on orig pol can't add WPD rider to this 15 pay life. Could do a COP to a new 15 pay life to add WPD. Would be fully underwritten and needed signed state RL noted yes WPD but couldn't be issued on pol w/o app and vnd.

A/S CHRISTINA WYNDAHAM, 40-1913, J184655385 wants to reinstate, 7050, 4/25 A/S CHRISTINA WYNDAHAM, 40-1913 172605-9088, cash value

A/S CHRISTINA WYNDAHAM, 40-1913 walked her to paid in advance tool thru abs for a new business app she wasn't 100% sure if the amount of coverage that was desired wanted current till emailed to her at (A33)

Joe Clemons, Policyowner/Insured, verified by telr 1 regarding decreasing the DB and how that will affect the CV earning in the future. LF-2805-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

A/S Christina called 40-1913 advised that how the dividends work. Current option is 3 option, advised that dividends sit on policy cash and earn interest. They can be taken out at any time or they are paid to heirs at the death of the insured in addition to the face amount. They are a separate number from the cash value which is the value of the base policy.

P/O Joe Clemons verified request for illustration to be mailed, verified address.

P/O Joe Clemons in regarding why he did not get WPD - I advised on the original app (2573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to rheumatoid arthritis. Joe had specific questions so I advised him to call his agent for further assistance.

A/S CHRISTINA WYNDAHAM, 40-1913, calling in regards to reline why the wpd was declined. RA

Ag Peggy Pinelli, 40-1913, LF-2805-9088 called to get copy of app that showed where the P/O/P applied for WPD. Advised that previous rep that spoke to P/O/P advised that it was not on original app but when the P/O/P did a term conversion on this policy the request was to have WPD. There is a signed AMD on this policy that advised P/O/P was aware that they lapsed without WPD. Sent AG copy of RL submitted with WPD requested.

Joe Clemons, P/O verified, 1726059088 clemons@worldnet.att.net called Joe Clemons, P/O verified, LF-2805-9088 asking if WPD was on policy adv: no. Adv: there is a signed AMD stating it lapsed with no WPD. Asking how much dividends apply. Would PO have at 15 years of having policy \$35,041. Cash value after 25 years \$120,058. Based on what PO pays now and at the end of 15 years will have paid \$152,450.00 Joe Clemons, P/O verified, LF-2805-1344 Called to verify at the end of the 15 years what will be approx cash value \$24,036.00 and accum dividends \$205,000. Based on what PO pays now and at the end of 15 years will have paid \$31,521.00

Joe Clemons, P/O LF-2805-9088 received a Sup. Esc. PO is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once TC was issued. P/O notes looks like never was on original app and then put it on there on TC app and was denied. I explained would get to a T/L to review and see what we can do and follow up with him.

Ag Clemons, INS: Spoke w/ Patrick Daniels yesterday, he said Patrick called him back and requested that he call in. I said I can't assist with his policy since I am in the Health Response Center. I can get him to a supervisor but not Patrick directly, or could get him to the LRC to assist. He disconnected the call.

A/S CHRISTINA WYNDAHAM, 40-1913, calling to see what a supervisor advised (the notes that were left from the supervisor) also advised that it is subject to underwriting he may be approved and he may not be approved.

Ag Peggy Pinelli, 40-1913 is unable to write a letter to the PI (40-1913) our legal department advise that the contract on the original term application LF-2573-9762 and TC app/existing policy LF-2805-9088 are legally binding documents and that we cannot make an exception to go back and add WPD, even if new policy LF-3597-7997 has the rider, the agent is being harassed and has been threatened with legal action, looking for guidance on a solution to effectively silence the insured if possible.

Joe Clemons (P/O) called because his number was on his caller ID. Listed policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left him a msg with her direct number which I do not have access to. He was driving and didn't check his messages, just called the number that showed on his caller ID.

Joe Clemons (P/O) LF-2805-9088 FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.5% on his annual notice. 1726051344 ALIAS - SR41 for WPD claim. Wanting to speak w/ public affairs.

Joe Clemons, P/O verified, LF-2805-9088 - Total accum divs \$13,521.53, then year \$49,343.2, no TC. Variable 5% interest rate. Interest accrues daily, but billed once a yr on whole. Thinking about taking \$25K. Advised 5% of \$25K is approx \$1,250 that would be billed in interest. This doesn't include loan payments and being made. If payments made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified have 4% guaranteed CV rate. AN statement shows a loan divs at 3.5%. Was in the middle of explaining that loan divs do not equal or affect the CV so same as a diff percentage (current/guaranteed) - phone cut out in middle of convo. No call back phone.

Joe Clemons (P/O) confirmed PO 1726059088 confirmed \$13,521.53 accumulated dividends which earn 3.5% interest. Interest on accumulated dividends per proposal not less than 3% and currently earn 3.5% loan interest 5% variable per current rates and non-guaranteed values.

Ag JACK TANKERSLEY, 40-1913, wanting to know the interest rate on the loan. Adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.5%

Joe Clemons PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anniv(6/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anniv(4/22/18), will be sent out around 8/1, no divs currently.

Joe Clemons PO verified, LF-2805-9088 PO wanted the CSV 74718.95 TG-0 all 5/7/18 if surrendered if cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the revised illustration. He is certain he saw something that said it could be as much as 6%. But he is not able to locate the paper. Found revised illustration in imaging 7/7/18. He wanted a copy of the revised illustration to be faxed to him at fax 843-753-7024. SA to SBC WKKREG-IRC-APD. T/TAPO RE: PO is requesting a copy of the RFI generated 07/07/2010 in ISBT, but a regular PPR w/ no changes should display the same information. Please mail to address on the existing illustration may not follow our guidelines. Will be mailed to address on file.

Ag Peggy Pinelli, 40-1913, please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an attorney to try to sue the agent. Agt also indicates that PI has been trying to get \$5 disability benefits since 2006. Sent Siebel email to CLAIMS.

Joe Clemons verified as PO find out what is the values in my life insurance. 1726051344 1159.05 accumulated dividends, 11,174.27 available is a loan. 1735977997 3150 accumulated dividends, \$15,414.61 1726059088 \$16,009.50 accumulated dividends, \$67,566.93 available as a loan, \$4061.45 Once terminated it cannot be reinstated and there is no taxable gain.

PO Joe Clemons, verified, 1726059088, 15 PL; loan available as of 4/18/19 Maximum loan available: \$67,594.51 Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO informs of being harassed by agent. Review annual interest rate of 5%, along with establishing loan billable. PO informs of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO.

Joe Clemons, P/O, verified, LF-2805-9088 wanting to know what divs are w/ for him to take out. Adv there are accum of \$16,009.50. Adv should request the funds through the agt office. Wants his policy to be transferred to a different agency. Transferred him to the agent selection line. LF-2806-1344 wanting to know what funds are w/ on the policy. Adv there are accum of \$1,259.05 and a loan w/ of \$11,347.71. Adv should request through agt office.

Joe Clemons PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed. I advised PO that I would send request up to a TM to verify what was happening with req to change servicing agt as per trf note 02-28 any contact by PO needs to be sent to Compliance Rachael Gomez (QSHQ) sent Siebel e mail.

PO Joe Clemons verified: Lost the call when trying to get the number to Agent Assignment.

Ag Peggy Pinelli, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

Ag Peggy Pinelli (40-1913) called for the special monthly premium with WPD. I advised approximately \$882.85.

A/S CHRISTINA WYNDAHAM, 40-1913 1726059088 transferred to life compliance.

1726059088 A/S MELISSA OVARIS, 40-1913, calling to state agt is requesting copy of RL from 7/2010 be emailed to her. emailed to a/s

Joe, PO VERIFIED, Inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.55%.

What was in that place

What was in that place.

038A Policyowner/Insured, Joe Clements, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan.

IB 10yceridan Bellade Policyowner/Insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding dividend from death benefit. Advised loan Int billed annually. He is not required to pay loan back but we do suggest loan Int is paid to keep policy from lapsing. Current Int rate is 3.6%, Int rate is variable. Trans to Belinda, loan or assistance with annuitizing.

Peggy 2805-9038 2573-9762 Agent, Peggy Pinnett (40-1913), called about WPD not on policy, when pol converted from 1573-9762 was not a rider on orig pol. can't add WPD rider to this 15 pay life. could do a COP to a pay life to add WPD. would be fully underwritten and needed signed since RL noted yes WPD but couldn't be issued on pol w/o app and und.

ISTINA WYNIDHAM, 40-1913, H34668336 wants to reinstate , 70.50, 4/25 A/S CHRISTINA WYNIDHAM, 40-1913 H2805-2088, cash value

ISTINA WYNIDHAM, 40-1913 walked her to paid in advance tool thru abs for a new business app she wasn't 100% sure of the amount or coverage that was desired wanted current ltr emailed to her at (IA3Y)

son, Policyowner/Insured verified by Lefr 1 regarding decreasing the DB and how that will affect the CV earning In the future. LF-2805-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run or other products. LF-2805-9038 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run notes for other products.

Hins calling 40-1913 advised that how the dividends work current option is second advised that dividend split on policy as cash and earn interest. They can be taken out at any time or they are paid to bene at the death of red in addition to the face amount. They are a separate number from the cash value which is the value of the base policy.

Clements verified request in force illustration to be mailed. Verified address

In regrading why he did not get WPD I looked on the original app (1573-9762) it was not applied for, but on Term Conversion (2805-9038) It was denied due to Rheumatoid Arthritis. She had specific questions so I him to call his agent for further assistance.

ISTINA WYNIDHAM, 40-1913, calling in regards to seeing why the wpd was declined. RA

GY PINNETT 40-1913 LF-2805-9038 called to get copy of app that showed where the PO/Pi applied for WPD. Advised that previous rep that spoke to PO/Pi advised that it was not on original app but when the PO/Pi did a conversion on this policy the rep said they want to have WPD. There is a signed AMD on this policy that advised PO/Pi was aware that they issued without WPD. Sent AO copy of RL submitted with WPD requested.

PO verified H2805-9038 Clements working on email now. Joe Clements, PO verified, LF-2805-9038 asking if WPD was on policy? adv no. adv there is a signed AMD stating it issued with no WPD. Asking how much is approx would PO have at 15 years of having policy \$35,081 Cash value after 15 years \$120,058 Based on what PO pays now and at the end of 15 years will have paid \$52,450 Joe Clements, PO verified, LF-2805-1344, Called A/U and one of the 15 years that will be approx cash value \$18,036.00 and accum dividends \$2052.00. Based on what PO pays now and at the end of 15 years will have paid \$31,321.00

ment P/O LF-2805-9038 received a Super PO wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once LC was issued. Per notes looks like never. Original app and then sent to the orig app and was denied. Explained would get to write to review and see what we can do and follow up with him.

ment INSJ spoke w/ Patrick DiNardo yesterday, he said Patrick called him back and requested that he call first. Adv I can't assist with his policy since I am in the Health Response Center. I can get him to a supervisor but not sure who could get him to the LRG to assist the disapproved the call

STINA WYNIDHAM, 40-1913, calling to see what a supervisor advised the notes that were left from the supervisor also advised that if subject to underwriting he may be approved and he may not be approved.

GY PINNETT 40-1913 tried to call or willing to write a letter of the PI from our legal department to advise that the contract on the original term application LF-2573-9762 and LC app/existing policy LF-2805-9038 are legally documents and that we cannot make an exception to go back and add WPD even if main policy LF-3597-7997 has the rider. The agent is being harassed and has been threatened with legal action, looking for guidance or a way to resolve situation the insured if possible too.

sons (PO) called because this number was on his caller ID located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9038. The notes under LF-2805-9038 indicate a recalled and false with his direct number which I do not have access to - He was dinner and didn't check his messages just called the number that showed on his caller ID.

ments (LF2805-9038 - FULLY VERIFIED PO - Calling to determine on the policy what the Interest rate on the dividends is; adv currently showing 3.6% on his annual notice. H28051344 AUAS - SR4E for WPD claim. Wanting to Public Affairs?

OIS PO verified LF2805-9038's cash account and \$13,521.53 Loan avail = \$19,341.12, no LG Variable 5% Interest rate; Interest amounts daily, but billed once every month. Thinking abt taking \$25K. Advised 5% of \$25K is 1,250 that would be billed in interest. This does not equal loan repayments are being made. If pymts made, loan interest billed decreases. Confirmed does not have to be all loan / can split between divs & loan. Verified guaranteed CV rate. AN statement shows accum divs at 3.6%. Was in the middle of explaining that accum divs do not equal effect the CV so earns at a diff percentage (currently guaranteed) - phone cut but in middle of call back phone #.

OIS confirmed PO LF2805-9038 confirmed \$13,521.53 accumulated dividends which earn 3.6% interest. Interest po accumulated dividends per preproposal not less than 3% and currently earn 3.6% (per interest 3%) per current rates and non-guaranteed values.

TANKENLEYV 40-1397 wanting to know the interest rate on the loan adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.6%

OIS PO (VER) called on policies LF-2805-9038 adv annual notice sent out 21 days prior to anniv(6/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anniv(8/22/18), will be around 8/1, no divs currently

OIS PO verified LF-2805-9038 PO wanted the CSV 7472.85 TG=off 5/7/18 if surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the illustration. He is certain he saw something that said it could be as much as 6%. But file is not able to locate the paper. Found revised illustration in Imaging 7/7/18. He wanted a copy of the revised illustration to be faxed to 8243-753-7024 SA to SBC WRITTEN LRC/APD T2AP RE: PO is requesting a copy of the RI generated 07/07/2010 in USPT, but a regular FPR w/no changes should display the same information. Please mail to address. Making the illustration may not follow our guidelines. Will be mailed to address on file.

RY PINNETT, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an av to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2006. Sent Siebel email to CLAIMS

DNS verified as PO Find out what the values in his life insurance. H28051344 \$159.05 accumulated dividends; 11,174.27 available as a loan. H35977997 31.50 accumulated dividends; \$15,414.51 H28052088 \$16,009.50 accumulated dividends; \$67,566.93 available as a loan. \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

EMMONS verified, H2805038; 15 PI; loan available as of 4/18/19 Maximum loan available: \$67,594.51.Taxable gain: \$20.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO inform of notified by agent. Review annual interest rate of 5%, along with establishing loan billable. PO Inform of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO

DNS PO verified, LF-2805-2085 wanting to know what divs are av for him to take out. I adv there are accounts of \$16,009.50. Adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent Selection Line. LF-2805-1344 wanting to know what funds are av on the policy. I adv there are accounts of \$1,159.05, and a loan av of \$11,174.27. I adv should request through agt

DNS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed I advised PO that I would send request up to a TAM to verify what was with req to change servicing agt as per tfo note 02-28 any contact by PO needs to be sent to Compliance Rachael Gomes (CSHO) sent Siebel e mail

EMMONS verified: Lost the call when trying to get the number to Agent Assignment.

GY PINNETT, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

GY PINNETT (40-1913) called for the special monthly premium with WPD. I advised approximately \$892.85.

STINA WYNIDHAM, 40-1913, H28059088 transferred to life compliance.

A/S MELISSA OVAHIS, 40-1913, calling to state agent requesting copy of rbl from 7/2010 be emailed to her. emailed to a/s

MELISSA OVAHIS Insured when he will receive annual notice. Adv'd not sure will be generated mid-year. Inquired about inconsistent rates. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

[illegible]

Start	End	Calling Name	Calling Number	Called Name	Called Number
Fri Mar 10 2017 07:48:35 AM	Fri Mar 10 2017 07:49:35 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 07:54:19 AM	Fri Mar 10 2017 07:56:37 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 08:01:45 AM	Fri Mar 10 2017 08:02:34 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 08:10:30 AM	Fri Mar 10 2017 08:19:56 AM	JOE A CLEMONS	8437537007	SHEILA R CLEMONS	8437532591
Fri Mar 10 2017 08:18:30 AM	Fri Mar 10 2017 08:22:11 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 08:21:10 AM	Fri Mar 10 2017 08:21:13 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 08:22:54 AM	Fri Mar 10 2017 08:23:36 AM	JOE A CLEMONS	8437537007	SHEILA R CLEMONS	8437532591
Fri Mar 10 2017 08:31:59 AM	Fri Mar 10 2017 08:32:56 AM	JOE A CLEMONS	8437537007	CHARLESTON SC	8439061133
Fri Mar 10 2017 08:33:38 AM	Fri Mar 10 2017 08:35:28 AM	JOE A CLEMONS	8437537007	CHARLESTON SC	8438104750
Fri Mar 10 2017 08:47:23 AM	Fri Mar 10 2017 08:47:56 AM	JOE A CLEMONS	8437537007	SHEILA R CLEMONS	8437532591
Fri Mar 10 2017 09:08:30 AM	Fri Mar 10 2017 09:09:08 AM	JOE A CLEMONS	8437537007	CHARLESTON SC	8439061133
Fri Mar 10 2017 09:53:20 AM	Fri Mar 10 2017 09:54:19 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 10:05:10 AM	Fri Mar 10 2017 10:05:40 AM	JOE A CLEMONS	8437537007	JOHNNIE BURKS	8437532557
Fri Mar 10 2017 10:05:39 AM	Fri Mar 10 2017 10:22:46 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 10:11:20 AM	Fri Mar 10 2017 10:12:03 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 10:23:00 AM	Fri Mar 10 2017 10:28:08 AM	JOE A CLEMONS	8437537007	JOHNNIE BURKS	8437532557
Fri Mar 10 2017 10:28:08 AM	Fri Mar 10 2017 10:32:22 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 10:33:21 AM	Fri Mar 10 2017 10:33:42 AM	JOE A CLEMONS	8437537007	WASHINGTON DC	2022057923
Fri Mar 10 2017 10:33:58 AM	Fri Mar 10 2017 10:34:02 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 10:34:13 AM	Fri Mar 10 2017 10:34:15 AM	JOE A CLEMONS	8437537007	BOWIGLNNDL MD	3013528397
Fri Mar 10 2017 10:34:37 AM	Fri Mar 10 2017 10:48:14 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 10:48:15 AM	Fri Mar 10 2017 10:53:29 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 10:56:21 AM	Fri Mar 10 2017 10:57:50 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 11:02:08 AM	Fri Mar 10 2017 11:09:34 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 11:15:39 AM	Fri Mar 10 2017 11:44:58 AM	JOE A CLEMONS	8437537007	WASHINGTON DC	2022057923
Fri Mar 10 2017 11:35:02 AM	Fri Mar 10 2017 11:35:07 AM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 11:45:09 AM	Fri Mar 10 2017 11:53:13 AM	JOE A CLEMONS	8437537007	SHEILA R CLEMONS	8437532591
Fri Mar 10 2017 12:32:22 PM	Fri Mar 10 2017 01:01:09 PM	JOE A CLEMONS	8437537007	WALTER JR & ALBERTHA M LEE	8437533524
Fri Mar 10 2017 01:06:49 PM	Fri Mar 10 2017 01:06:53 PM	JOE A CLEMONS	8437537007	CHARLESTON SC	8439061133
Fri Mar 10 2017 01:07:07 PM	Fri Mar 10 2017 01:07:45 PM	JOE A CLEMONS	8437537007	CHARLESTON SC	8438104750
Fri Mar 10 2017 01:11:32 PM	Fri Mar 10 2017 01:11:33 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 01:22:14 PM	Fri Mar 10 2017 01:25:46 PM	JOE A CLEMONS	8437537007	WASHINGTON DC	2022057923
Fri Mar 10 2017 01:39:26 PM	Fri Mar 10 2017 01:39:28 PM	JOE A CLEMONS	8437537007	MONCKS COR SC	8438262222
Fri Mar 10 2017 01:40:47 PM	Fri Mar 10 2017 01:53:52 PM			JOE A CLEMONS	8437537007

Fri Mar 10 2017 01:48:17 PM	Fri Mar 10 2017 01:48:21 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 01:57:15 PM	Fri Mar 10 2017 01:57:18 PM	JOE A CLEMONS	8437537007	MONCKS COR SC	8438262222
Fri Mar 10 2017 01:57:39 PM	Fri Mar 10 2017 02:04:26 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 02:05:28 PM	Fri Mar 10 2017 02:10:14 PM	JOE A CLEMONS	8437537007	B T VANISH	8436884601
Fri Mar 10 2017 02:07:09 PM	Fri Mar 10 2017 02:07:12 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 02:13:56 PM	Fri Mar 10 2017 02:14:41 PM	JOE A CLEMONS	8437537007	HOME TELEPHONE CO METAS	8434821234
Fri Mar 10 2017 02:17:46 PM	Fri Mar 10 2017 02:31:45 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 02:28:27 PM	Fri Mar 10 2017 02:31:08 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 04:02:43 PM	Fri Mar 10 2017 04:06:17 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 04:08:55 PM	Fri Mar 10 2017 04:30:39 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 04:53:38 PM	Fri Mar 10 2017 04:53:49 PM	JOE A CLEMONS	8437537007	CHARLESTON SC	8439061133
Fri Mar 10 2017 05:01:54 PM	Fri Mar 10 2017 05:02:55 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 05:03:55 PM	Fri Mar 10 2017 05:07:47 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 05:14:22 PM	Fri Mar 10 2017 05:14:25 PM	JOE A CLEMONS	8437537007	PINEVILLE SC	8433514419
Fri Mar 10 2017 05:14:51 PM	Fri Mar 10 2017 05:15:28 PM	JOE A CLEMONS	8437537007	LYNNE HOWELL	8436884527
Fri Mar 10 2017 05:16:56 PM	Fri Mar 10 2017 05:24:56 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 05:21:11 PM	Fri Mar 10 2017 05:21:23 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 05:28:41 PM	Fri Mar 10 2017 05:50:19 PM	JOE A CLEMONS	8437537007	CHARLESTON SC	8436931743
Fri Mar 10 2017 05:50:08 PM	Fri Mar 10 2017 05:50:10 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 05:50:36 PM	Fri Mar 10 2017 05:53:36 PM	JOE A CLEMONS	8437537007	SHEILA R CLEMONS	8437532591
Fri Mar 10 2017 06:05:40 PM	Fri Mar 10 2017 06:06:36 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 06:16:51 PM	Fri Mar 10 2017 06:16:59 PM	JOE A CLEMONS	8437537007	CHARLESTON SC	8439061133
Fri Mar 10 2017 06:26:00 PM	Fri Mar 10 2017 06:28:14 PM	JOE A CLEMONS	8437537007	SHEILA R CLEMONS	8437532591
Fri Mar 10 2017 06:39:57 PM	Fri Mar 10 2017 06:41:24 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 07:22:29 PM	Fri Mar 10 2017 07:37:43 PM			JOE A CLEMONS	8437537007
Fri Mar 10 2017 08:20:45 PM	Fri Mar 10 2017 08:21:21 PM	JOE A CLEMONS	8437537007	HOME TELEPHONE CO METAS	8434821234
Fri Mar 10 2017 08:32:40 PM	Fri Mar 10 2017 08:32:57 PM	JOE A CLEMONS	8437537007	CHARLESTON SC	8436931743
Fri Mar 10 2017 09:54:12 PM	Fri Mar 10 2017 09:54:23 PM			JOE A CLEMONS	8437537007

@ How could I call ~~peggy~~ office
 at 8:32:40 PM Home Telephone

03427

10/10/11

3

1-10-11
11/11

1-10-11
11/11
11/11

May Part 2 Calls made to State
 ON May 21, 2021 & May 24, 2021 Farm

Wed May 19 2021 11:35:57 AM	Wed May 19 2021 11:36:01 AM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 11:39:23 AM	Wed May 19 2021 11:40:56 AM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 12:00:31 PM	Wed May 19 2021 12:00:41 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 12:06:58 PM	Wed May 19 2021 12:07:19 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 12:14:40 PM	Wed May 19 2021 12:15:02 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 12:18:03 PM	Wed May 19 2021 12:19:06 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 12:22:49 PM	Wed May 19 2021 12:27:56 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-693-1743
Wed May 19 2021 12:46:55 PM	Wed May 19 2021 02:06:48 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 12:58:56 PM	Wed May 19 2021 12:59:24 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 01:04:52 PM	Wed May 19 2021 01:05:21 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 01:53:04 PM	Wed May 19 2021 01:54:09 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 02:07:06 PM	Wed May 19 2021 02:10:16 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:07:06 PM	Wed May 19 2021 02:10:16 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:10:47 PM	Wed May 19 2021 02:13:18 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:10:47 PM	Wed May 19 2021 02:13:18 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:13:41 PM	Wed May 19 2021 02:30:58 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:13:41 PM	Wed May 19 2021 02:30:58 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:31:55 PM	Wed May 19 2021 02:35:40 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:31:55 PM	Wed May 19 2021 02:35:40 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Wed May 19 2021 02:37:32 PM	Wed May 19 2021 02:37:46 PM	JOE A CLEMONS	843-753-7007	ATLANTA GA	404-827-1500
Wed May 19 2021 02:41:30 PM	Wed May 19 2021 03:04:59 PM	JOE A CLEMONS	843-753-7007		800-734-5870
Wed May 19 2021 02:41:30 PM	Wed May 19 2021 03:04:59 PM	JOE A CLEMONS	843-753-7007		800-734-5870
Wed May 19 2021 02:56:52 PM	Wed May 19 2021 02:58:24 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 03:19:07 PM	Wed May 19 2021 03:23:29 PM	JOE A CLEMONS	843-753-7007	BERKELEY CTY GOV COURTHOUSE	843-719-4400
Wed May 19 2021 04:23:00 PM	Wed May 19 2021 04:28:51 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 04:33:06 PM	Wed May 19 2021 04:35:36 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 04:37:10 PM	Wed May 19 2021 04:40:43 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 04:42:05 PM	Wed May 19 2021 04:44:47 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 04:49:03 PM	Wed May 19 2021 04:49:24 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 05:02:17 PM	Wed May 19 2021 05:02:53 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 05:10:22 PM	Wed May 19 2021 05:10:39 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 06:05:19 PM	Wed May 19 2021 06:05:23 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 06:54:27 PM	Wed May 19 2021 06:54:37 PM	JOE A CLEMONS	843-753-7007		866-890-1151
Wed May 19 2021 06:54:27 PM	Wed May 19 2021 06:54:37 PM	JOE A CLEMONS	843-753-7007		866-890-1151
Wed May 19 2021 07:04:39 PM	Wed May 19 2021 07:10:02 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 07:45:27 PM	Wed May 19 2021 08:11:16 PM	JOE A CLEMONS	843-753-7007	FRANCIS PRESIDENT JR	843-753-3954
Wed May 19 2021 08:12:05 PM	Wed May 19 2021 08:20:43 PM	JOE A CLEMONS	843-753-7007	COLUMBIA SC	803-754-5209

Wed May 19 2021 08:20:35 PM	Wed May 19 2021 08:35:04 PM			JOE A CLEMONS	843-753-7007
Wed May 19 2021 08:44:20 PM	Wed May 19 2021 08:44:57 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-810-4750
Wed May 19 2021 09:26:35 PM	Wed May 19 2021 09:37:15 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 08:49:07 AM	Thu May 20 2021 08:57:06 AM	JOE A CLEMONS	843-753-7007	NWALTERBOR SC	843-538-3995
Thu May 20 2021 08:57:31 AM	Thu May 20 2021 09:24:30 AM	JOE A CLEMONS	843-753-7007	WALTER JR & ALBERTHA M LEE	843-753-3524
Thu May 20 2021 09:23:25 AM	Thu May 20 2021 09:25:27 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 09:24:22 AM	Thu May 20 2021 09:24:31 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 09:40:30 AM	Thu May 20 2021 09:42:42 AM	JOE A CLEMONS	843-753-7007	YORK PA	717-434-5599
Thu May 20 2021 09:43:16 AM	Thu May 20 2021 10:01:38 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 09:56:44 AM	Thu May 20 2021 09:56:47 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 10:01:37 AM	Thu May 20 2021 10:17:43 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 10:08:10 AM	Thu May 20 2021 10:08:54 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 10:25:45 AM	Thu May 20 2021 10:51:29 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 10:35:34 AM	Thu May 20 2021 10:35:36 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 10:48:21 AM	Thu May 20 2021 10:48:28 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 11:26:40 AM	Thu May 20 2021 11:27:55 AM	JOE A CLEMONS	843-753-7007	BERKELEY CTY GOV COURTHOUSE	843-719-4400
Thu May 20 2021 11:39:25 AM	Thu May 20 2021 11:40:05 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 11:43:20 AM	Thu May 20 2021 11:44:04 AM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 11:44:58 AM	Thu May 20 2021 12:24:03 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 12:07:16 PM	Thu May 20 2021 12:09:24 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 12:28:39 PM	Thu May 20 2021 12:35:56 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-810-4750
Thu May 20 2021 01:08:47 PM	Thu May 20 2021 01:09:55 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 02:06:11 PM	Thu May 20 2021 02:30:29 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 02:59:43 PM	Thu May 20 2021 03:00:32 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 03:02:08 PM	Thu May 20 2021 03:02:13 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-906-1133
Thu May 20 2021 03:10:45 PM	Thu May 20 2021 03:11:23 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-810-4750
Thu May 20 2021 03:21:40 PM	Thu May 20 2021 03:22:20 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 03:37:22 PM	Thu May 20 2021 03:43:58 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 03:44:13 PM	Thu May 20 2021 03:46:14 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-906-1133
Thu May 20 2021 04:38:24 PM	Thu May 20 2021 04:39:56 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 05:00:41 PM	Thu May 20 2021 05:04:08 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-906-1133
Thu May 20 2021 05:08:04 PM	Thu May 20 2021 05:11:14 PM	JOE A CLEMONS	843-753-7007	HERBERT & RUTHIE DOYAL	843-749-1757
Thu May 20 2021 05:10:04 PM	Thu May 20 2021 05:16:09 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 05:16:38 PM	Thu May 20 2021 05:30:00 PM	JOE A CLEMONS	843-753-7007	HERBERT & RUTHIE DOYAL	843-749-1757
Thu May 20 2021 05:29:59 PM	Thu May 20 2021 05:36:12 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 06:47:49 PM	Thu May 20 2021 08:00:13 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Thu May 20 2021 06:47:49 PM	Thu May 20 2021 08:00:13 PM	JOE A CLEMONS	843-753-7007		800-922-0204

Thu May 20 2021 06:52:43 PM	Thu May 20 2021 06:52:48 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 10:20:51 PM	Thu May 20 2021 10:36:01 PM			JOE A CLEMONS	843-753-7007
Thu May 20 2021 11:09:04 PM	Thu May 20 2021 11:34:50 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-693-1743
Fri May 21 2021 07:32:08 AM	Fri May 21 2021 07:42:54 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 07:56:21 AM	Fri May 21 2021 08:04:04 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 08:05:38 AM	Fri May 21 2021 08:05:51 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 08:23:22 AM	Fri May 21 2021 08:23:51 AM	JOE A CLEMONS	843-753-7007	WALTER JR & ALBERTHA M LEE	843-753-3524
Fri May 21 2021 08:26:05 AM	Fri May 21 2021 08:26:19 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 08:26:57 AM	Fri May 21 2021 08:27:14 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-810-4750
Fri May 21 2021 08:35:44 AM	Fri May 21 2021 08:38:20 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 08:48:04 AM	Fri May 21 2021 08:48:29 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 08:51:32 AM	Fri May 21 2021 08:51:50 AM	JOE A CLEMONS	843-753-7007	ATLANTA GA	404-313-9287
Fri May 21 2021 08:55:40 AM	Fri May 21 2021 08:56:39 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-906-1133
Fri May 21 2021 09:25:19 AM	Fri May 21 2021 09:27:55 AM	JOE A CLEMONS	843-753-7007	RICHARD RAVENELL	843-753-3711
Fri May 21 2021 09:29:47 AM	Fri May 21 2021 09:30:06 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 09:35:19 AM	Fri May 21 2021 09:35:29 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 09:38:47 AM	Fri May 21 2021 09:40:41 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-364-2633
Fri May 21 2021 09:54:56 AM	Fri May 21 2021 10:08:53 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 10:09:33 AM	Fri May 21 2021 10:10:05 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-810-4750
Fri May 21 2021 10:13:55 AM	Fri May 21 2021 10:13:58 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 10:14:44 AM	Fri May 21 2021 10:15:02 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 10:22:46 AM	Fri May 21 2021 10:22:49 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 11:53:16 AM	Fri May 21 2021 11:53:30 AM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 12:24:21 PM	Fri May 21 2021 12:38:26 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 12:24:21 PM	Fri May 21 2021 12:38:26 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 12:39:17 PM	Fri May 21 2021 12:40:02 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 12:39:40 PM	Fri May 21 2021 12:43:01 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 12:39:40 PM	Fri May 21 2021 12:43:01 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 12:41:15 PM	Fri May 21 2021 12:53:54 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 01:24:33 PM	Fri May 21 2021 01:33:29 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 01:33:53 PM	Fri May 21 2021 01:37:08 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 01:33:53 PM	Fri May 21 2021 01:37:08 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 01:35:39 PM	Fri May 21 2021 02:19:31 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 02:21:39 PM	Fri May 21 2021 02:22:35 PM	JOE A CLEMONS	843-753-7007	TIMOTHY RAVENELL	843-753-2895
Fri May 21 2021 02:24:05 PM	Fri May 21 2021 02:24:25 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-810-4750
Fri May 21 2021 02:35:43 PM	Fri May 21 2021 03:26:02 PM	JOE A CLEMONS	843-753-7007	NEW ALBANY OH	614-775-7909
Fri May 21 2021 03:22:53 PM	Fri May 21 2021 03:23:26 PM			JOE A CLEMONS	843-753-7007

Two Calls Made ^{End} The Same Time.

Fri May 21 2021 03:33:45 PM	Fri May 21 2021 03:34:09 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 03:38:59 PM	Fri May 21 2021 04:06:27 PM	JOE A CLEMONS	843-753-7007	State Farm	855-534-0227
Fri May 21 2021 03:38:59 PM	Fri May 21 2021 04:06:27 PM	JOE A CLEMONS	843-753-7007	State Farm	855-534-0227
Fri May 21 2021 04:06:57 PM	Fri May 21 2021 04:35:12 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 04:06:57 PM	Fri May 21 2021 04:35:12 PM	JOE A CLEMONS	843-753-7007		800-922-0204
Fri May 21 2021 04:23:13 PM	Fri May 21 2021 04:23:17 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 04:37:31 PM	Fri May 21 2021 05:49:08 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 05:08:59 PM	Fri May 21 2021 05:09:24 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 05:35:36 PM	Fri May 21 2021 05:35:37 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 07:03:26 PM	Fri May 21 2021 07:03:33 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 07:24:49 PM	Fri May 21 2021 08:11:25 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 08:20:49 PM	Fri May 21 2021 08:22:22 PM			JOE A CLEMONS	843-753-7007
Fri May 21 2021 08:52:19 PM	Fri May 21 2021 08:52:28 PM	JOE A CLEMONS	843-753-7007	HOLLY HILL SC	803-971-0580
Fri May 21 2021 08:53:47 PM	Fri May 21 2021 08:53:58 PM	JOE A CLEMONS	843-753-7007	HOLLY HILL SC	803-971-0580
Fri May 21 2021 08:56:25 PM	Fri May 21 2021 08:56:27 PM	JOE A CLEMONS	843-753-7007	HOLLY HILL SC	803-971-0580
Fri May 21 2021 08:57:49 PM	Fri May 21 2021 08:57:49 PM	JOE A CLEMONS	843-753-7007	HOLLY HILL SC	803-971-0580
Sat May 22 2021 08:02:04 AM	Sat May 22 2021 08:16:31 AM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 09:38:34 AM	Sat May 22 2021 09:38:37 AM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 10:11:13 AM	Sat May 22 2021 10:11:17 AM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 10:26:45 AM	Sat May 22 2021 10:26:49 AM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 11:22:19 AM	Sat May 22 2021 11:22:27 AM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 01:06:35 PM	Sat May 22 2021 01:06:39 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 01:12:33 PM	Sat May 22 2021 01:12:49 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 01:58:15 PM	Sat May 22 2021 01:59:31 PM	JOE A CLEMONS	843-753-7007	SUMMERVL SC	843-873-1450
Sat May 22 2021 03:39:59 PM	Sat May 22 2021 03:40:53 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 04:05:07 PM	Sat May 22 2021 04:06:02 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 05:06:54 PM	Sat May 22 2021 05:08:32 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 05:09:10 PM	Sat May 22 2021 05:09:17 PM	JOE A CLEMONS	843-753-7007	HERBERT & RUTHIE DOYAL	843-749-1757
Sat May 22 2021 05:26:32 PM	Sat May 22 2021 05:26:43 PM	JOE A CLEMONS	843-753-7007		866-890-1151
Sat May 22 2021 05:26:32 PM	Sat May 22 2021 05:26:43 PM	JOE A CLEMONS	843-753-7007		866-890-1151
Sat May 22 2021 05:31:23 PM	Sat May 22 2021 05:53:31 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 06:34:47 PM	Sat May 22 2021 06:55:38 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 06:55:44 PM	Sat May 22 2021 06:55:46 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 06:55:59 PM	Sat May 22 2021 06:56:25 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 07:24:36 PM	Sat May 22 2021 07:29:06 PM	JOE A CLEMONS	843-753-7007	QUEEN RAVENELL	843-753-4465
Sat May 22 2021 07:31:55 PM	Sat May 22 2021 07:32:09 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 07:32:49 PM	Sat May 22 2021 07:44:58 PM	JOE A CLEMONS	843-753-7007	NWALTERBOR SC	843-538-3995

Sat May 22 2021 07:42:00 PM	Sat May 22 2021 07:42:04 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 07:42:30 PM	Sat May 22 2021 07:45:04 PM			JOE A CLEMONS	843-753-7007
Sat May 22 2021 07:45:22 PM	Sat May 22 2021 07:49:54 PM	JOE A CLEMONS	843-753-7007	NWALTERBOR SC	843-538-3995
Sat May 22 2021 07:50:21 PM	Sat May 22 2021 07:56:13 PM	JOE A CLEMONS	843-753-7007	HERBERT & RUTHIE DOYAL	843-749-1757
Sat May 22 2021 07:56:55 PM	Sat May 22 2021 08:04:17 PM	JOE A CLEMONS	843-753-7007	COLUMBIA SC	803-754-5209
Sat May 22 2021 09:14:17 PM	Sat May 22 2021 09:19:30 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-693-1743
Sun May 23 2021 08:41:31 AM	Sun May 23 2021 08:45:39 AM	JOE A CLEMONS	843-753-7007	HOME TELEPHONE CO METAS	843-482-1234
Sun May 23 2021 09:08:50 AM	Sun May 23 2021 09:11:33 AM	JOE A CLEMONS	843-753-7007	WALTER JR & ALBERTHA M LEE	843-753-3524
Sun May 23 2021 09:11:51 AM	Sun May 23 2021 09:50:26 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-810-4750
Sun May 23 2021 09:15:26 AM	Sun May 23 2021 09:15:29 AM			JOE A CLEMONS	843-753-7007
Sun May 23 2021 09:51:06 AM	Sun May 23 2021 09:51:09 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-693-1743
Sun May 23 2021 09:56:02 AM	Sun May 23 2021 09:59:03 AM			JOE A CLEMONS	843-753-7007
Sun May 23 2021 10:10:31 AM	Sun May 23 2021 10:14:39 AM			JOE A CLEMONS	843-753-7007
Sun May 23 2021 03:05:13 PM	Sun May 23 2021 03:06:06 PM			JOE A CLEMONS	843-753-7007
Sun May 23 2021 07:05:37 PM	Sun May 23 2021 07:08:33 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-693-1743
Sun May 23 2021 07:09:17 PM	Sun May 23 2021 07:18:50 PM	JOE A CLEMONS	843-753-7007	DETROITZNG MI	313-289-9813
Mon May 24 2021 08:34:41 AM	Mon May 24 2021 08:35:17 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 08:36:43 AM	Mon May 24 2021 08:37:09 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 08:49:10 AM	Mon May 24 2021 08:59:10 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 09:30:47 AM	Mon May 24 2021 09:32:05 AM	JOE A CLEMONS	843-753-7007	ATLANTA GA	404-313-9287
Mon May 24 2021 09:45:19 AM	Mon May 24 2021 09:51:09 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-364-2633
Mon May 24 2021 09:51:07 AM	Mon May 24 2021 09:51:37 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 10:12:11 AM	Mon May 24 2021 10:24:09 AM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-767-5284
Mon May 24 2021 10:26:00 AM	Mon May 24 2021 10:26:33 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 10:35:23 AM	Mon May 24 2021 10:36:31 AM	JOE A CLEMONS	843-753-7007	COLUMBIA SC	803-734-2037
Mon May 24 2021 10:38:17 AM	Mon May 24 2021 10:38:42 AM	JOE A CLEMONS	843-753-7007	COLUMBIA SC	803-734-2038
Mon May 24 2021 10:39:25 AM	Mon May 24 2021 10:44:17 AM	JOE A CLEMONS	843-753-7007	COLUMBIA SC	803-734-2038
Mon May 24 2021 10:40:50 AM	Mon May 24 2021 10:41:11 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 10:45:03 AM	Mon May 24 2021 10:52:23 AM	JOE A CLEMONS	843-753-7007		877-797-2227
Mon May 24 2021 10:45:03 AM	Mon May 24 2021 10:52:23 AM	JOE A CLEMONS	843-753-7007		877-797-2227
Mon May 24 2021 10:59:58 AM	Mon May 24 2021 11:03:47 AM	JOE A CLEMONS	843-753-7007	HOME TELEPHONE CO METAS	843-482-1234
Mon May 24 2021 11:07:58 AM	Mon May 24 2021 11:17:52 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 11:09:45 AM	Mon May 24 2021 11:09:55 AM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 11:18:34 AM	Mon May 24 2021 11:19:04 AM	JOE A CLEMONS	843-753-7007	WAMPEE SC	843-734-1080
Mon May 24 2021 02:36:21 PM	Mon May 24 2021 02:37:06 PM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 02:45:54 PM	Mon May 24 2021 02:48:19 PM			JOE A CLEMONS	843-753-7007
Mon May 24 2021 02:49:20 PM	Mon May 24 2021 03:19:23 PM	JOE A CLEMONS	843-753-7007	State Farm	855-534-0227

Mon May 24 2021 02:49:20 PM	Mon May 24 2021 03:19:23 PM	JOE A CLEMONS	843-753-7007	State Farm	855-534-0227
Mon May 24 2021 03:25:03 PM	Mon May 24 2021 03:25:50 PM	JOE A CLEMONS	843-753-7007	HOME TELEPHONE CO METAS	843-482-1234
Mon May 24 2021 03:32:18 PM	Mon May 24 2021 03:33:15 PM	JOE A CLEMONS	843-753-7007	COLUMBIA SC	803-734-2052
Mon May 24 2021 03:36:40 PM	Mon May 24 2021 03:38:52 PM	JOE A CLEMONS	843-753-7007	COLUMBIA SC	803-734-2809
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Mon May 24 2021 05:16:34 PM	Mon May 24 2021 05:22:12 PM	JOE A CLEMONS	843-753-7007	CHARLESTON SC	843-693-1743
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Mon May 24 2021 06:35:14 PM	Mon May 24 2021 06:36:27 PM	JOE A CLEMONS	843-753-7007	JAMES H LEE	843-753-2485
Mon May 24 2021 07:15:56 PM	Mon May 24 2021 07:16:19 PM			JOE A CLEMONS	843-753-7007
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Fri May 28 2021 06:31:34 AM	Fri May 28 2021 06:31:37 AM			JOE A CLEMONS	843-753-7007
Fri May 28 2021 10:31:12 AM	Fri May 28 2021 10:31:34 AM			JOE A CLEMONS	843-753-7007
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Sat May 29 2021 10:05:19 AM	Sat May 29 2021 10:06:45 AM	JOE A CLEMONS	843-753-7007	HERBERT & RUTHIE DOYAL	843-749-1757

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Sat May 29 2021 11:24:08 AM	Sat May 29 2021 11:24:11 AM			JOE A CLEMONS	843-753-7007
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Sun May 30 2021 06:40:16 PM	Sun May 30 2021 06:55:09 PM			JOE A CLEMONS	843-753-7007

Common Pleas

Clerk : Leah Guerry Dupree

300 B California Avenue

Moncks Corner, SC 29461

Phone:(843) 719-4400 Fax:(843) 719-4509

Received From: Clemons, Joe
2022 Addidas St.
Eutawville, SC 29048

Date: 10/10/2022
Receipt #: 6114351
Clerk: c08stovin

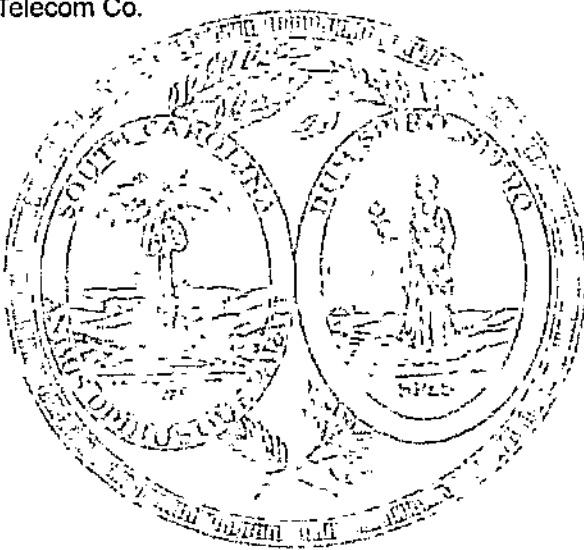
Paying for: Self
Transaction Type: Payment

Payment Type: Cash \$150.00
Total Paid: \$150.00

Reference #:
Comment:
Non-Refundable

You may check the status of your Berkeley case at:

<http://www.sccourts.org/caseSearch/>

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2022CP0802427	Joe Clemons VS William S Helmly/President & CEO of Home Telecom Co.	\$150.00	\$150.00	\$0.00
				
Total Cases: 1		\$150.00	\$150.00	\$0.00

1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124	1125	1126	1127	1128	1129	1130	1131	1132	1133	1134	1135	1136	1137	1138	1139	1140	1141	1142	1143	1144	1145	1146	1147	1148	1149	1150	1151	1152	1153	1154	1155	1156	1157	1158	1159	1160	1161	1162	1163	1164	1165	1166	1167	1168	1169	1170	1171	1172	1173	1174	1175	1176	1177	1178	1179	1180	1181	1182	1183	1184	1185	1186	1187	1188	1189	1190	1191	1192	1193	1194	1195	1196	1197	1198	1199	1200	1201	1202	1203	1204	1205	1206	1207	1208	1209	1210	1211	1212	1213	1214	1215	1216	1217	1218	1219	1220	1221	1222	1223	1224	1225	1226	1227	1228	1229	1230	1231	1232	1233	1234	1235	1236	1237	1238	1239	1240	1241	1242	1243	1244	1245	1246	1247	1248	1249	1250	1251	1252	1253	1254	1255	1256	1257	1258	1259	1260	1261	1262	1263	1264	1265	1266	1267	1268	1269	1270	1271	1272	1273	1274	1275	1276	1277	1278	1279	1280	1281	1282	1283	1284	1285	1286	1287	1288	1289	1290	1291	1292	1293	1294	1295	1296	1297	1298	1299	1300	1301	1302	1303	1304	1305	1306	1307	1308	1309	1310	1311	1312	1313	1314	1315	1316	1317	1318	1319	1320	1321	1322	1323	1324	1325	1326	1327	1328	1329	1330	1331	1332	1333	1334	1335	1336	1337	1338	1339	1340	1341	1342	1343	1344	1345	1346	1347	1348	1349	1350	1351	1352	1353	1354	1355	1356	1357	1358	1359	1360	1361	1362	1363	1364	1365	1366	1367	1368	1369	1370	1371	1372	1373	1374	1375	1376	1377	1378	1379	1380	1381	1382	1383	1384	1385	1386	1387	1388	1389	1390	1391	1392	1393	1394	1395	1396	1397	1398	1399	1400	1401	1402	1403	1404	1405	1406	1407	1408	1409</
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1088 Policyowner/insured, Joe Clemons, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan.

1089 10/10/2011 Belinda Policyowner/insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.6%, int rate is variable. Trans to Belinda, loan or assistance with annulizing.

PEGGY PINNELL 2573-9762 Agent, Peggy Pinnell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol. can't add WPD rider to this 15 pay life, could do a COP to a pay life to add WPD, would be fully underwritten, and needed signed since RL noted yr WPD but couldn't be issued on pol w/o app and und.

ISTINA WYNDAHAM, 40-1913, 1134665386 wants to reinstate, 70.50, 4/25 A/S CHRISTINA WYNDAHAM, 40-1913 112805-9088, cash value

ISTINA WYNDAHAM, 40-1913 walked her to paid in advance tool thru abs for a new business app she wasn't 100% sure of the amount or coverage that was desired wanted current ltr emailed to her at (1A3Y)

1090 Policyowner/insured verified by telr 1 regarding decreasing the DB and how that will affect the CV warning in the future. LF-2805-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run or other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

1091 Policyowner/insured called to ask about the dividends work. Current option is accu. advised that dividends sit on policy as cash and earn interest. They can be taken out at any time, or they are paid to bene at the death of the insured in addition to the face amount. They are a separate number from the cash value, which is the value of the base policy.

1092 Clemons verified request for force illustration to be mailed, verified address.

1093 died in regarding why he did not get WPD. I advised on the original app (2573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to Rheumatoid Arthritis. Joe had specific questions, so I had to call his agent for further assistance.

1094 ISTINA WYNDAHAM, 40-1913, calling in regards to seeing why the wpd was declined. RA. *This never happen, a big lie and what is the deal.*

1095 GY PINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the PO/PI applied for WPD. Advised that previous rep that spoke to PO/PI advised that it was not on original app but when the PO/PI did a conversion on this policy the request was to have WPD. There is a signed AMD on this policy that advised PO/PI was aware that they issued without WPD. Sent AO copy of RI submitted with WPD requested.

1096 ions: PO verified, 1128059088 clemons@worldnet.att.net, Joe Clemons, PO verified, LF-2805-9088 Asking if WPD was on policy? adv, no. adv, there is a signed AMD stating it issued with no WPD. Asking how much it approx. would PO have at 15 years of having policy \$35,081. Cash value after 15 years \$180,058 Based on what PO pays now and at the end 15 years will have paid \$52,450.00 Joe Clemons, PO verified, LF-2805-1344 Called at the end of the 15 years what will be approx cash value: \$21,036.00 and accum dividends: \$2052.00 Based on what PO pays now and at the end 15 years will have paid \$31,522.00

1097 ions: PO LF-2805-9088 received as a sup. PO is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once TC was issued. Per notes looks like never original app and then put it on there on TC app and was denied. I explained would get to a TA to review and see what we can do and follow up with him.

1098 want: INS: spoke w/ Patrick Diabets yesterday, he said Patrick called him back and requested that he call in adv. can't assist with his policy since I am in the Health Response Center. I can get him to a supervisor but not directly, or I could get him to the LRC to assist. He disconnected the call.

1099 ISTINA WYNDAHAM, 40-1913, calling to see what a supervisor advised the notes that were left from the supervisor. I also advised that it is subject to underwriting he may be approved, and he may not be approved.

1100 GY PINNELL, 40-1913, we were willing to write a letter to the PI from our legal department to advise that the contract on the original term application LF-2573-9762 and TC app/existing policy LF-2805-9088 are legally documents and that we cannot make an exception to go back and add WPD, even if new policy LF-3597-7997 has the rider? the agent is being harassed and has been threatened with legal action, looking for guidance or a TA to effectively advise the insured if possible.

1101 ions (PO) called because this number was on his caller ID. Located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left a message with her direct number which I do not have access to. He was driving and didn't check his messages, just called the number that showed on his caller ID.

1102 ions LF-2805-9088: FULLY VERIFIED PO - calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.6% on his annual notice. LF-2805-1344: ALIAS - SR4F for WPD claim. Wanting to Public adjust?

1103 MONS: PO verified, LF-2805-9088 - Total accum divs = \$13,511.53. Loan avail = \$49,348.12, net TG. Variable 3% interest rate. Interest accrues daily, but billed once yr on w/ly. Thinking abt taking \$25K. Advised 3% of \$25K is \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If pymts made, loan interest bill decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified guaranteed CV rate. AN statement shows accum divs at 3.6%. Was in the middle of explaining that accum divs do not equal or reflect the CV so earns at a diff percentage (current/guaranteed) - phone cut out in middle of to call back please.

1104 MONS (confirmed PO) LF-2805-9088 - confirmed \$13,511.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per reproposal not less than 3% and currently earn 3.6% loan interest 5% per current rates and non-guaranteed values.

1105 K TAI (KERSLEY, 40-1913, wanting to know the interest rate on the loan, adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.6%.

1106 MONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anny(6/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anny(12/18/18), will be around B/L, no divs currently.

1107 MONS PO verified, LF-2805-9088 PO wanted the CSV 74728.95 TG=0.00 5/7/18 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the illustration. He is certain he saw something that said it could be as much as 6%, but he is not able to locate the paper. Found revised illustration in imaging 7/7/10. He wanted a copy of the revised illustration to be faxed to 8843-753-7024. SR to SBC-VNRKRD-LRC-APO. TAIAD RE: PO is requesting a copy of the RI generated 07/07/2010 in USIT, but a regular FPR w/no changes should display the same information. Please mail to address. s having the illustration may not follow our guidelines. Will be mailed to address on file.

1108 GY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an /to try to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2006. Sent Stibel email to CLAIMS.

1109 MONS verified as PO find out what is the values in my life insurance. 1128051344 1159.05 accumulated dividends, 11,174.27 available as a loan 1128057997 31.50 accumulated dividends, \$15,414.61 1128059088 \$16,009.50 accumulated dividends, \$67,566.93 available as a loan, \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

1110 CLEMONS, verified, 1128059088, 15 PL; loan available as of 4/18/19 Maximum loan available: \$67,594.51. Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO inform of advised by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO.

1111 MONS: PO verified, LF-2805-9088 Wanting to know what divs are adv for him to take but I adv there are accum of \$16,009.50. I adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent selection line. LF-2805-1344 wanting to know what funds are on the policy. I adv there are accum of \$1,159.05 and a loan av of \$11,347.71. I adv should request through agt.

1112 MONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be compit. I advised PO that I would send request up to a TM to verify what was ing with req to change servicing agt as per trfo note 02-28 any contact by PO needs to be sent to Compliance Rachael Gomez (CSHQ) sent Stibel e mail.

1113 CLEMONS verified: Lost the call when trying to get the number to Agent Assignment.

1114 GY PINNELL, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

1115 PEGGY PINNELL (40-1913) called for the special monthly premium with WPD. I advised approximately \$882.85.

1116 ISTINA WYNDAHAM, 40-1913, 1128059088 transferred to life compliance.

1117 088 A/S MELISSA OWANS, 40-1913, calling to state agt is requesting copy of rbl from 7/2010 be emailed to her. emailed to a/s.

1118 VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

[illegible]

2805-9038 Policyowner/insured, Joe Clemons, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash value back out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan

28059088 10 year term Belinda Policyowner/insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding loan is deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.5%. Int rate is variable. Trans to Belinda, Values floor or assistance with annuities.

40-1913 Peggy 2805-9088 2573-9762 Agent, Peggy Pinell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol. Can't add WPD rider to this 15 pay life. Could do a COP to a new 15 pay life to add WPD. Would be fully underwritten and needed signed since it noted yes WPD but couldn't be issued on pol w/o app and und.

A/S CHRISTINA WYNDHAM, 40-1913, 134655336 wants to reinstate, 70.50, 4/25 A/S CHRISTINA WYNDHAM, 40-1913 172605-9088, cash value

A/S CHRISTINA WYNDHAM, 40-1913 walked her to paid in advance tab thru abs for a new business app she wasn't 100% sure of the amount or coverage that was desired wanted current ill emailed to her at (A3Y)

Joe Clemons, Policyowner/insured verified by telr 1 regarding decreasing the DB and how that will affect the CV saving in the future. LF-2806-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

A/S Christina called 40-1913 advised that the dividends were correct option is correct. advised that dividends sit on policy as cash and earn interest. They can be taken out at any time or they are paid to her at the death of the insured in addition to the face amount. They are a separate number from the cash value which is the value of the base policy.

A/S Joe Clemons verified request in force illustration to be mailed, verified address.

PI Joe called in regarding why he did not get WPD. I advised on the original app (2573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to Rheumatoid Arthritis. Joe had specific questions so I advised him to call his agent for further assistance.

A/S CHRISTINA WYNDHAM, 40-1913, calling in regards to seeing why the wpd was declined. RA *this price happens a big lie, and what is the debt.*

Agt PEGGY PINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the PO/PI applied for WPD. Advised that previous rep that spoke to PO/PI advised that it was not on original app but when the PO/PI did a term conversion of this policy the request was to have WPD. There is a signed AMD on this policy that advised PO/PI was aware that they lapsed without WPD. Sent AO copy of AI submitted with WPD requested.

Joe Clemons, PO verified, 1726059088 clemonsjoel@gmail.com Joe Clemons, PO verified, LF-2805-9088 Asking if WPD was on policy? adv. no, adv. there is signed AMD stating it lapsed with no WPD. Asking how much dividends approx. would PO have at 15 years of having policy \$35,041. Cash value after 15 years \$140,058. Based on what PO pays now and at the end of 15 years will have paid 152,45.00 Joe Clemons, PO verified, LF-2806-1344 Called to verify at the end of the 15 years what will be approx. cash value: \$28,036.00 and accumulated dividends: \$2052.00. Based on what PO pays now and at the end of 15 years will have paid \$31,321.00

Joe Clemons, P/O LF-2805-9088 received as a Sup. Esc. PO is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once TC was issued. Per notes looks like never was on original app and then put it on there on TC app and was denied. I explained would get to a TA to review and see what we can do and follow up with him.

Joe Clemons, INSD, spoke w/ Patrick Daniels yesterday. He said Patrick called him back and requested that he call (rct adv) can't assist with his policy since I am in the Health Response Center. I can get him to a supervisor but not Patrick directly or could not him to the LRC to assist. He disconnected the call.

A/S CHRISTINA WYNDHAM, 40-1913, calling to see what a supervisor advised the notes that were left from the supervisor I also advised that it is subject to underwriting he may be approved and he may not be approved.

Agt. PEGGY PINNELL, 40-1913 she was able to write a letter to the PI from our legal department to advise that the contract on the original term application LF-2573-9762 and TC app/existing policy LF-2805-9088 are legally binding documents and that we cannot make an exception to go back and add WPD, even if new policy LF-3597-7997 has the rider? the agent is being harassed and has been threatened with legal action, looking for guidance or a solution to effectively silence the insured if possible.

Joe Clemons (PO) called because this number was on his caller ID. Located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left him a vnm with her direct number which I do not have access to - He was driving and didn't check his messages, just called the number that showed on his caller ID.

Joe Clemons LF-2805-9088 - FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.5% on his annual notice. 1726061344 ALIAS - SMF for WPD claim. Wanting to speak w/ Public Affairs?

JOE CLEMONS PO verified LF-2805-9088 - Total accum divs = \$13,521.52. Loan avail = \$49,348.32. no TC. Variable 5% interest rate. Interest accrues daily, but billed once a yr on anniv. Thinking abt taking \$25K. Advised 5% of \$25K is approx \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If pymts made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified have 4% guaranteed CV rate. AN statement shows accum divs at 3.5%. Was in the middle of explaining that accum divs do not equal or affect the CV so same at a diff percentage (credit guarantee) - phone cut out in middle of comp. His call back phone #

JOE CLEMONS confirmed PO 1726059088 - confirmed \$13,521.53 accumulated dividends which earn 3.5% interest. Interest on accumulated dividends per rep proposal not less than 3% and currently earn 3.5% loan interest 5% variable per current rates and non-guaranteed values.

Agt JACK TANKERSLEY, 40-1397, wanting to know the interest rate on the loan adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.5%

JOE CLEMONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anniv (6/7/18), will be mailed out around 5/18 LF-3597-7997 adv annual notice sent out 21 days prior to anniv (6/22/18), will be sent out around 5/11, no divs currently

JOE CLEMONS PO verified LF-2805-9088 PO wanted the CV 3472.95 TC 50 all 5/7/18 if surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for accum divs is not less than 3% per the revised illustration - he is certain he saw something that said it could be as much as 5%. But he is not able to locate the paper. Found revised illustration in imaging 7/7/10. He wanted a copy of the revised illustration to be faxed to him at fax 8643-753-7024 SR to SBL-WKREQ-LRC-APD **TZAPD RE: PO is requesting a copy of the RRI generated 07/07/2010 in BEIT, but a regular PFR w/no changes should display the same information. Please mail to address on file as faxing the illustration may not follow our guidelines. Will be mailed to address on file.

Agt. PEGGY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an attorney to try to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2006. Sent Seibel email to CLAIMS

JOE CLEMONS verified as PO find out what is the values in his life insurance 1726061344 1159.05 accumulated dividends, 11,174.27 available as a loan 1735977997 3150 accumulated dividends, \$15,414.61 1726059088 \$16,009.50 accumulated dividends, \$67,555.93 available as a loan, \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

PO JOE CLEMONS, verified, 1726059088, 15 PI; loan available as of 4/18/19 Maximum loan available: \$67,594.51. Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO inform of being chastised by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RLC part A and F for ACH direct deposit. PO will follow up with AO

JOE CLEMONS, PO, verified, LF-2805-9088 wanting to know what divs are w/ for him to take out. I adv there are accums of \$16,009.50. I adv should request the funds through the agt office. Wants his policy to be transferred to a different agency. Transferred him to the agent selection line. LF-2806-1344 wanting to know what funds are w/ on the policy. I adv there are accums of \$1,159.05, and a loan av of \$11,347.71. I adv should request through agt office.

JOE CLEMONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed I advised PO that I would send request up to a TM to verify what was happening with req to change servicing agt as per info note 02-26 any contact by PO needs to be sent to Compliance Rachel Gomez (CSHQ) sent Seibel email

PO JOE CLEMONS verified - Test the call when trying to get the number to Agent Assignment

Agt. PEGGY PINNELL, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

Agent, PEGGY PINNELL (40-1913) called for the special monthly premium with WPD. I advised approximately \$862.85

A/S CHRISTINA WYNDHAM, 40-1913, 1726059088 transferred to life compliance

1726059088 A/S MELISSA OWENS, 40-1913, calling to state agt is requesting copy of rbi from 7/2010 be emailed to her. emailed to a/s

Joe, PO VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.5%.

What was in that place

[illegible]

1038 Policyowner/Insured, Joe Clemons, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan

1039 Policyowner/Insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.6%, int rate is variable. Trans to Belinda, for or assistance with annulment.

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1041 ISTINA WYNHAM, 40-1913, 1/34665336 wants to reinstate, 70.90, 4/25 A/S CHRISTINA WYNHAM, 40-1913 1/2805-9088, cash value

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1045 Clemons verified request in force illustration to be mailed. Verified address.

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1049 tony, PO verified, 1/28059088 clemons@valdnet.com, Joe Clemons, PO verified, LF-2805-9088 Asking if WPD was on policy? Adv, no. Adv, there is a signed AMD stating it issued with no WPD. Asking how much is approx. would PO have at 15 years of having policy \$35,081. Cash value after 15 years \$180,058. Based on what PO pays now and at the end of 15 years will have paid \$52,450. Joe Clemons, PO verified, LF-2805-1344 called, at the end of the 15 years what will be approx. cash value \$28,036.00 and accum dividends \$2052.00. Based on what PO pays now and at the end of 15 years WPD have paid \$31,321.80

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1051 (mons) NSO spoke w/ Patrick Daniels yesterday, he said Patrick called him back and requested that he call in. Adv can't assist with his policy since I am in the Health Response Center. I can get him to a supervisor but not directly, could get him to the LRC to assist. He disconnected the call.

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1054 tony (PO) called because this number was on his caller ID. Located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left a with his direct number, which I do not have access to. He was driving and didn't check his messages. Just called the number that showed on his caller ID.

1055 tony, LF-2805-9088 FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.6% on his annual notice. 1/28061344 AUAS - SR4K for WPD claim. Wanting to / Public Affairs?

1056 MONS PO verified, LF-2805-9088 - Total accum divs = \$13,521.53. Loan avail = \$49,348.32. No TC. Variable 5% (interest rate). Interest accrues daily, but billed once a yr on which thinking not taking \$25K. Advised 5% of \$25K is \$1,250 that would be billed in interest. This does not assume loan payments are being made. If pymts made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified guaranteed CV rate. AN statements show accum divs at 3.6%. Was in the middle of explaining that accum divs do not equal or effect the CV so earn at a diff percentage (current/guaranteed) - phone cut out in middle of to call back home.

1057 MONS confirmed PO 1/28059088 confirmed \$13,521.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per rep report not less than 3% and currently earn 3.6% (loan interest 5% - current rates and non-guaranteed values).

1058 K. TANKERSLEY, 40-1997, wanting to know the interest rate on the loan, adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.6%.

1059 MONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to ann (6/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to ann (8/22/18), will be around 8/1, no divs currently.

1060 MONS PO verified, LF-2805-9088 PO wanted the CSV 74728.95 TC-0 off 5/7/18 if surrendered it cannot be reinstated. PO asked about interest rate. Advised the policy interest rate for acc divs is not less than 3% per the illustration - he is certain he saw something that said it could be as much as 6%. But he is not able to locate the paper. Found revised illustration in Imaging 7/7/18. He wanted a copy of the revised illustration to be faxed to 8843-753-7024. SR to SBL WRKREQ-LRC-APD. T2APD RE: PO is requesting a copy of the ANI generated 07/07/2010 in LSR, but a regular PPR w/no changes should display the same information. Please mail to address. Faxing the illustration may not follow our guidelines. VNI be mailed to address on file.

1061 GY Pinnell, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an / to try to sue the agent. Also indicates that PI has been trying to get SS Disability benefits since 2006. Sent Stebel email to CLAIMS.

1062 MONS verified as PO find out what is the values in my life insurance. 1/28061344 1159.05 accumulated dividends; 11,174.27 available as a loan. 1/35977997 31.50 accumulated dividends \$15,414.61 1/28059088 \$16,009.50 total dividends; \$67,566.93 available as a loan. \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

1063 CLEMONS verified, 1/28059088; 15 PL loan available as of 4/18/19 Medium Loan available: \$67,594.51 Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO inform of satisfied by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RL part A and P for ACH direct deposit. PO will follow up with AO.

1064 MONS PO verified, LF-2805-9088 wanting to know what divs are adv for him to take out. Adv there are accum of \$16,009.50. Adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent selection line. LF-2806-1344 wanting to know what funds are adv on the policy. Adv there are accum of \$1,159.05 and a loan adv of \$11,347.71. Adv should request through agt.

1065 MONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be compild. I advised PO that I would send request up to a TM to verify what was log with req to change servicing agt as per info note 02-28 any contact by PO needs to be sent to Compliance Rachel Gomez (QSHQ) sent Stebel email.

1066 CLEMONS verified, lost the call when trying to get the number to Agent Assignment.

1067 GY Pinnell, 40-1913, how AMD form was sent to Insure, Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

1068 EGY Pinnell (40-1913) called for the special monthly premium with WPD, I advised approximately \$692.85.

USTINA WYNHAM, 40-1913, 1/28059088 transferred to life compliance.

088 A/S MELISSA OJWALS, 40-1913, calling to state agt requesting copy of rbi from 7/2010 be emailed to her. emailed to a/s

VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate, Adv'd acc div guaranteed is 3%, Adv'd interest on acc div being earned is currently 3.35%.

[illegible]

STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

JOE CLEMONS

Plaintiff

WILLIAM S. HELMLY, INDIVIDUALLY, and
as PRESIDENT & CEO of HOME TELECOM
COMPANY; & HOME TELECOM COMPANY
dba, (jointly and severally liable),
Defendants

) IN THE COURT OF COMMON PLEAS
) FOR THE NINTH JUDICIAL CIRCUIT

) CASE NO.: 2021- CP-08- 02709

Response to
) PLAINTIFF'S MOTION TO
) ~~OPPOSE~~ DEFENDANT'S
) MOTION TO DISMISS

2022 MAR -2 PM 5:00
LEAH GUERRA, CLERK OF COURT
BERKELEY COUNTY, SC

FILED

TO: The Court

COMES NOW, Plaintiffs who moves in opposition to Defendant's motion to dismiss, in support he submits:

SUFFICIENT SERVICE OF PROCESS

SCRCP Rule 4(d)(8) – provides “Service by Certified Mail. Service of a summons and complaint upon a defendant of any class referred to in paragraph (1) or (3) of this subdivision of this rule may be made by the plaintiff or by any person authorized to serve process pursuant to Rule 4(c), ...by registered or certified mail, return receipt requested....”

Service is effective upon the date of delivery as shown on the return receipt, which he provided to the court, and included here as (Exhibits 1 & 2), his signed postal return receipt. As such, effected sufficient service upon Defendants and which bring Defendants and the subject matter of this action within the jurisdiction of this court.

STATUTE OF LIMITATIONS

Defendants' allege that Plaintiff's claims are barred by South Carolina's three-year Statute of Limitations, S.C. Code Ann, sec. 15-5-530, Plaintiff responds that his claim is not barred based on Defendants' actions up to and continuing through May 2021; actions which helped

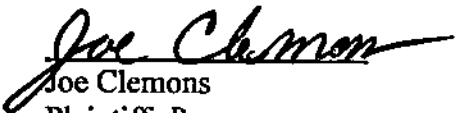
cc:
J.C.

form the basis upon which Plaintiff's fault claims are grounded.

PRAYER FOR RELIEF

Plaintiff prays that Defendant's Motion To Dismiss be dismissed and that this case be set for jury trial so that his legitimate claims based on Defendants' egregious acts, which include – Breach of Contract; Breach of Fiduciary Duty; Negligence; Negligent Misrepresentation; Constructive Fraud; Civil Conspiracy, may be heard by a jury and upon a favorable verdict, he be awarded civil damages in an amount to be determined, punitive damages, attorney's fees and costs.

Respectfully submitted,


Joe Clemons

Plaintiff, *Pro se*

2202 Addidas Street

Eutawville, SC 29048

843 753-7007

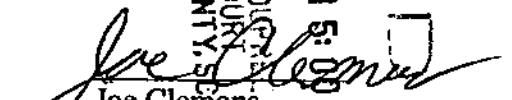
clemonsweilding1@gmail.com

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that copies of the within Plaintiff's Motion to Oppose Defendant's Motion to Dismiss, is filed in person at the office of Clerk of Court, and to Defendants' counsel by electronic mail, this 2, day of March 2022.

Robert E. Kneece, III
rkneece@turnerpadgett.com


FILED
2022 MAR -2 PM 5:00
LEAH GUERRY DICKERSON
CLERK OF COURT
BERKELEY COUNTY, SC


Joe Clemons
Plaintiff, *Pro se*

Joe Clemons vs. William Helmly

EXHIBIT 1

Postal Receipt

EXHIBIT 1

U.S. Postal ServiceTM
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com.

U.S. E

Postmark Here

DEC 31 2021

Postage and Fees

Postage	\$1.55
Adult Signature Restricted Delivery	\$0.00
Adult Signature Restricted Delivery	\$0.00
Certified Mail Restricted Delivery	\$0.00
Return Receipt (hardcopy)	\$0.00
Return Receipt (electronic)	\$0.00
Extra Services & Fees (check box, add fee as appropriate)	\$0.00
Certified Mail Fee	\$3.75

Total Postage and Fees \$8.35

Sent To: _____

Street and Apt. No., or P.O. Box No. _____

City, State, ZIP+4[®] _____

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Joe Clemons vs. William Helmly

EXHIBIT 2

Return Post Card Receipt

EXHIBIT-2

Joe Clemons
Plaintiff

Case # 2021CP08027

vs.

Home Telecom
William S. Heberly

2022 JAN -6 PM 3:06
CLERK OF COURT
BERKELEY COUNTY, SC

FILED

Joe Clemons
1-6-2022

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature ☒ Agent ☐ Addressee X C-19	
1. Article Addressed to: Home Telecom 579 Stoney Landing Rd, Moncks Corner, SC 29461		B. Received by (Printed Name) C-2 KK	C. Date of Delivery 1-3-22
2. Article Number (Transfer from service label) 9590 9402 6973 1225 2818 13		D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No	
 9590 9402 6973 1225 2818 13		3. Service Type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail® ☐ Certified Mail Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Insured Mail ☐ Insured Mail Restricted Delivery (over \$500) ☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery	
PS Form 3811, July 2020 PSN 7530-02-000-9003		Domestic Return Receipt	

cc:
J.C.

STATE OF SOUTH CAROLINA)
COUNTY OF BERKELEY) IN THE COURT OF COMMON PLEAS
JOE CLEMONS) NINTH JUDICIAL CIRCUIT
) Civil Action No. 2021-CP-08-02709
Plaintiff,)

Vs.

PLAINTIFF'S MOTIOM REQUESTING
JUDGE YOUNG RECONSIDER HIS RULING
OF 8-8-2022, ON

)
WILLIAM S. HELMLY, PRESIDENT & CEO,)
HOME TELECOM COMPANY (jointly)
and severally liable),)
Defendants)
_____)

2022 AUG 31 PM 4:39
CLERK OF COURT
BERKELEY COUNTY, SC

FILED

To the Honorable Judge Roger Young, it is with great joy, hope and anticipation that I can come before you sir, and to write this **Reconsideration and Request** to inform and remind you of the issues concerning this case. On January 11, 2021, I came before you with two motions (Case No: 2019-CP-08-00424). One was to extend the deposition period so I could depose two people, and one of the two was Mr. Willam S. Helmly, President, and CEO of Home Telecom Company. The second motion was to add Home Telecom Company to the Lawsuit that I had against State Farm, as a co-conspirator, because Home Telecom was helping State Farm to cover their crime of forgery, where State Farm forge my name on documents. During the virtual hearing of the case, you granted both motions. This case against Home Telecom that is before you today is because Home Telecom has refused to provide my full accurate telephone records that I requested on three separate occasions and paid for. I had requested my records multiple times because the records Home Telecom provided showed no calls between myself and State Farm. However, when my phone records were provided to me by State

cc: J.C.

SPH

Farm's records showed that I called many times. Further, I have received letters from State Farm's corporate and local offices wherein they stated I called multiple times. The S.C. Department of Insurance contacted State Farm Agency and State Farm stated to the Department of Insurance that I had made multiple calls to the local and corporate offices. This proves that calls were made because State Farm's records and letters showed they had received these calls, but Home Telecom's records did not show I made any calls to State Farm from March 1-May 31, 2017. My phone records are important to validate that I spoke to State Farm representatives which are needed to win my case.

I presented this information to you during the January 11, 2021, hearing and you granted my motion to add Home Telecom as a co-conspirator and to depose Mr. William S. Helmly, which I did. In the deposition, Mr. Helmly revealed that he and State Farm Agent, Mrs. Peggy Pinnell were neighbors. He also stated that when calls are made, they are permanently stored in the company's server. Despite this, Home Telecom to this day has refused to provide me with my full, accurate telephone records. This is a breach of contract, violation of privacy, a federal crime, and an obstruction of justice.

Judge Young, I hope that you will allow me to proceed with this case to hold Home Telecom accountable for their crime and misconduct. I'm submitting this motion asking you sir, to please reconsider your ruling of Aug. -8-2022, wherein you ruled to dismiss my complaint against Home Telecom and Mr. William Helmly. At that hearing on 7-19-2022, I provided sufficient explanation and proof, and two exhibits, and certified mailed. The Order that was send to me on 8-8-2022, of that ruling did not reflect or acknowledge anything that show that I was even present and certainly not any of my proofs and exhibits. Sir, that Order that was written seem to have been written up by the opposing counsel, as to a repeat to what was done on 1-11-2021, hearing when you allowed the opposing party to write up the form 4 and the Order, where they change your ruling of one of my motions you granted and changed one to denied. It seems like it has happened again, because that Order that was written on 8-8-2022, have almost the identical things in it as to what the opposing party presented in memorandum and brief, even down to the foot notes. So, in my **CONCLUSION**, I'm asking you to please reconsider that Ruling and Order that was made on 8-8-2022 and Denied that Motion to dismiss my case against HOME TELECOM AND WILLIAM HELMLY.

From the Desk of Joe Clemons

By: Joe Clemons


Pro Se Litigant

E-Mail: clemonswelding1@gmail

2202 Addidas St.

Eutawville, SC 29048

(843) 753-7007

August 30, 2022.

STATE OF SOUTH CAROLINA

COUNTY OF Berkeley

Joe Clemens

Plaintiff,

vs.

William S. Helmly, President & CEO, Home Telecom Company (Jointly) and Severally liable,

Defendant.

IN THE COURT OF COMMON PLEAS
9th JUDICIAL CIRCUIT

CASE NO.: 2021-CP-08-02709

MOTION AND ORDER INFORMATION
FORM AND COVERSHEET

Plaintiff's Attorney:

Joe Clemens Pro Se Bar No. none

Address:

2202 Addidas St, Eutawville, SC

Phone: 843-753-7007 Fax: 29048

E-mail: Clemenswelding@gmail.com

Defendant's Attorney:

Address:

Phone:

E-mail:

☐ MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and II)

☐ FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)

☐ PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion: Asking Judge Young to Reconsider His Ruling of 8-8-22

Estimated Time Needed: 5 hr

Court Reporter Needed: ☒ YES ☐ NO

SECTION II: Motion/Order Type

☒ Written motion attached

☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

Joe Clemens

Signature of Attorney for ☒ Plaintiff / ☐ Defendant

8-31-22, 2022
Date submitted

SECTION III: Motion Fee

☒ PAID - AMOUNT: \$ 25.00

☐ EXEMPT:

(check reason)

☐ Rule to Show Cause in Child or Spousal Support

☐ Domestic Abuse or Abuse and Neglect

☐ Indigent Status ☐ State Agency v. Indigent Party

☐ Sexually Violent Predator Act ☐ Post-Conviction Relief

☐ Motion for Stay in Bankruptcy

☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)

☐ Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions

Name of Court Reporter: _____

☐ Other: _____

JUDGE'S SECTION

☐ Motion Fee to be paid upon filing of the attached order.

☐ Other: _____

JUDGE CODE _____

Date: _____, 20

CLERK'S VERIFICATION

Collected by: (Signature)

Date Filed: 8/31/2022, 2022

☒ MOTION FEE COLLECTED: \$ Cash \$25.00

☐ CONTESTED - AMOUNT DUE: \$ _____

Two Exhibits

As follows, that

was handed to the

Judge on 7-18-2022

at hearing.

March 18, 2020

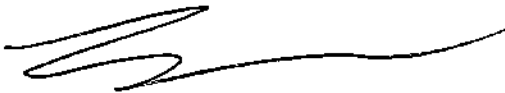
Joe A. Clemons
2202 Addidas Street
Eutawville, SC 29048

Dear Mr. Clemons,

This letter is to inform you that Home Telecom has reviewed our internal systems, processes, and controls. We have found no evidence of external or internal intrusion or tampering in our systems. We believe the data we provided to you in March of 2018 is complete and accurate.

We have spent considerable time, effort, and expense in conversation with you and in investigating per your request. Any subsequent requests related to this issue will require a valid subpoena.

Sincerely,



William S. Helmly
President & CEO
Home Telecom

[illegible]

Exhibit 2

038 Policyowner/Insured, Joe Clements, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan

18 10 yr certain Belinda Policyowner/Insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.5%. Int rate is variable. Trans to Belinda, loan or assistance with annuitizing.

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ISTINA WYNHAM, 40-1913 walked her to paid in advance tool thru abs for a new business app she want's 100% sure of the amount or coverage that was desired, wanted current MI emailed to her at [A3V]

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son, LF-2805-9088, FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.6% on his annual notice. 1/28061344 ADAS - SR4F for WPD claim. Wanting to Public Affairs

MONS PO verified LF-2805-9088 - Total accum divs = \$13,321.53. Loan avail = \$49,348.32, no TG. Variable 5% interest rate. Interest accrues daily, but billed once a yr on anniv. Thinking abt taking \$25K. Advised 5% of \$25K is \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If events made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified guaranteed CV rate. An statement shows accum divs at 3.6%. Was in the middle of explaining that accum divs do not equal or affect the CV so earns at a diff percentage (current/guaranteed) - phone cut out in middle of to call back on 8/1

MONS confirmed PO 1/28059088 confirmed \$13,321.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per proposal not less than 3% and currently earn 3.6% loan interest 5% per current rates and non-guaranteed values

X TAJIKENASLEY, 40-1397, wanting to know the interest rate on the loan: adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.6%

MONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anniv (5/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anniv (8/22/18), will be around 8/1, no divs currently

MONS PO verified LF-2805-9088 PO wanted the CSV 74728.95 TG off 5/7/18 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the illustration - he is certain he saw something that said it could be as much as 6%. But he is not able to locate the paper. Found revised illustration in imaging 7/7/10. He wanted a copy of the revised illustration to be faxed to agt #243-737-7024 SR to SBL-WKREQ-LRC-APD TAPD RE: PO is requesting a copy of the RL generated 07/07/2010 in ISET, but a regular PPR w/no changes should display the same information. Please mail to address. Faxing the illustration may not follow our guidelines. Will be mailed to address on file.

IGY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an /to try to sue the agent. Act also indicates that PI has been trying to get SS disability benefits since 2006. Sent Siebel email to CLAIMS

MONS verified as PO find out what is the values in my life insurance 1/28051344 \$159.05 accumulated dividends, 11,174.27 available as a loan 1/35977997 \$1,500 accumulated dividends; \$15,414.61 1/28059088 \$16,009.50 accumulated dividends; \$67,566.93 available as a loan; \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

CLEMENTS verified; 1/28059088; 15 PL; loan available as of 4/18/19 Maximum loan available: \$67,594.51. Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO inform of claimed by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO

MONS PO verified, LF-2805-9088 wanting to know what divs are avl for him to take but, I adv there are accounts of \$15,009.50. I adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent selection line. LF-2806-1344 wanting to know what funds are avl on the policy. I adv there are accounts of \$1,159.05 and a loan avl of \$11,347.12. I adv should request through agt

MONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed I advised PO that I would send request up to a TM to verify what was ng with req to change servicing agt as per trf note 02-25 any contact by PO needs to be sent to Compliance Rachael Gomez (OSHQ) sent Siebel e mail

CLEMENTS verified: lost the call when trying to get the number to Agent Assignment

IGY PINNELL, 40-1913, how AMD form was sent to Insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

EGGY PINNELL (40-1913) called for the special monthly premium with WPD. I advised approximately \$882.85.

ISTINA WYNHAM, 40-1913, 1/28059088 transferred to life compliance

883 A/S MELISSA OYANIS, 40-1913, calling to state agt is requesting copy of rl from 7/7/2010 be emailed to her, emailed to a/s

VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

NAME	STATUS	CONTACT	DATE	DESCRIPTION
LUNDQVIST	Archived	LRC Workgroup	MEMB	LEIDA
BOYCE	Archived	LRC Workgroup	QABA	BOYCE
SMICHEZ	Archived	LRC Workgroup	SBA	CHRISTINE
FEIGHTNER	Archived	LF-RC-PHONE-ONLY	AGYB	FEIGHTNER
STEPHENS	Archived	LF-RC-PHONE-ONLY	FAQD	STEPHENS
BOXER	Archived	LF-RC-PHONE-ONLY	UCKR	SHAGNA
WEBB	Archived	SBL PHONE-LRC-TERS	AMNU	WEBB
TOOMEY	Archived	SBL PHONE-LRC-TERS	YBFG	TOOMEY
CAUST	Archived	SBL PHONE-LRC-TERS	YBFG	CAUST
BEHNER	Archived	SBL PHONE-LRC-TERS	CKOB	BEHNER
DECKARD	Archived	SBL PHONE-LRC-TERS	YBFG	DECKARD
AYCOCK	Archived	SBL PHONE-LRC-TERS	YBFG	AYCOCK
DANIELS	Archived	SBL PHONE-LRC-TERS	YBFG	DANIELS
RIBBEL	Archived	SBL PHONE-LRC-TERS	YBFG	RIBBEL
MOPECK	Archived	SBL PHONE-LRC-TERS	YBFG	MOPECK
STEVENS	Archived	SBL PHONE-LRC-TERS	YBFG	STEVENS
LINDSEY	Archived	SBL PHONE-LRC-TERS	YBFG	LINDSEY
VANGOLDER	Archived	SBL PHONE-LRC-TERS	YBFG	VANGOLDER
SABZEYARI	Archived	SBL PHONE-LRC-TERS	YBFG	SABZEYARI
BLESSENBAUGH	Archived	SBL PHONE-LRC-TERS	YBFG	BLESSENBAUGH
HARDING	Archived	SBL PHONE-LRC-TERS	YBFG	HARDING
BROWN	Archived	SBL PHONE-LRC-TERS	YBFG	BROWN
SABZEYARI	Archived	SBL PHONE-LRC-TERS	YBFG	SABZEYARI
HAYZUS	Closed	SBL PHONE-LRC-TERS	YBFG	HAYZUS
PARKER	Closed	SBL PHONE-LRC-TERS	YBFG	PARKER
HARRIS	Closed	SBL PHONE-LRC-TERS	YBFG	HARRIS
MORGAN	Closed	SBL PHONE-LRC-TERS	YBFG	MORGAN
HETTK	Closed	SBL PHONE-LRC-TERS	YBFG	HETTK
MOYER	Closed	SBL PHONE-LRC-TERS	YBFG	MOYER
RAVUSH	Closed	SBL PHONE-LRC-TERS	YBFG	RAVUSH
PERKINS	Closed	SBL PHONE-LRC-TERS	YBFG	PERKINS
FRANCO	Closed	SBL PHONE-LRC-TERS	YBFG	FRANCO
RAUBER	Closed	SBL PHONE-LRC-TERS	YBFG	RAUBER
SOWARD	Closed	SBL PHONE-LRC-TERS	YBFG	SOWARD

2805-9088 Policyowner/insured, Joe Clemons, called to the details of the policy he was under the understanding that after 15 years I have a paid up policy and would be able to take the cash value back out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan

2805-9088 10 year term Belinda Policyowner/insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding loan is deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.6%. Int rate is variable. Trans to Belinda, Values floor or assistance with annuitizing.

40-1913 Peggy 2805-9088 2573-9762 Agent, Peggy Pinell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol, can't add WPD rider to this 15 year life, could do a COP to a new 15 year life to add WPD, would be fully underwritten, and needed signed since RL not yet WPD but couldn't be issued by pol w/o app and und.

A/S CHRISTINA WYNIDHAM, 40-1913, 1134655386 wants to reinstate, 70.90, 4.25 A/S CHRISTINA WYNIDHAM, 40-1913 112805-9088, cash value

A/S CHRISTINA WYNIDHAM, 40-1913 called her to paid in advance tool thru abs for a new business app she wasn't 100% sure of the amount or coverage that was desired wanted current ill emailed to her at (143V)

Joe Clemons, Policyowner/insured verified by tel & regarding decreasing the DB and how that will affect the CV earning in the future. LF-2106-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

A/S Christina called 40-1913, advised that how the dividends work. Current option is to receive dividends on policy as cash and earn interest. They can be taken out at any time, or they are paid to her at the death of the insured in addition to the face amount. They are a separate number from the cash value, which is the value of the base policy.

P/O Joe Clemons verified request for force illustration to be mailed, verified address

P/O called in regarding why he did not get WPD. I advised on the original app (2573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to Rheumatoid Arthritis. Joe had specific questions, so I advised him to call his agent for further assistance.

A/S CHRISTINA WYNIDHAM, 40-1913, calling to inquire why the WPD was declined. RA. *This never happens a big life, and what is the debt the rate*

Agt L PEGGY PINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the P/O applied for WPD. Advised that previous rep that spoke to P/O advised that it was not on original app but when the P/O did a term conversion on this policy the request was to have WPD. There is a signed AMD on this policy that advised P/O/P was aware that they insured without WPD. Sent AO copy of RL submitted with WPD requested.

Joe Clemons, P/O verified, 112805-9088 clemonsjoelw@comcast.net Joe Clemons, P/O verified, LF-2805-9088 Asking if WPD-PD was on policy? Adv no, adv there is a signed AMD stating it issued with an WPD. Asking how much dividends approx would PO have at 15 years of having policy \$35,081. Cash value after 15 years \$120,058. Based on what PO pays now and at the end of 15 years will have paid \$152,450.00 Joe Clemons, P/O verified, LF-2805-1344 Called to verify at the end of the 15 years what will be approx cash value, \$18,036.00 and accum dividends \$20,520.00. Based on what PO pays now and at the end of 15 years will have paid \$31,321.60

Joe Clemons, P/O LF-2805-9088 received as a Sup. Exec PO is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once TC was issued. Per notes looks like never was on original app and then put it on there on TC app and was denied. I explained would get in a 7/1 to review and see what we can do and follow up with him.

Joe Clemons, INS. Spoke w/ Patrick Daniels yesterday, he told P/O called him back and requested that he call in. Adv can't assist with his policy since I am in the Health Response Center, I can get him to a supervisor but not Patrick directly, agt could get him to the LAC to assist. He disconnected the call.

A/S CHRISTINA WYNIDHAM, 40-1913 calling to see what a supervisor advised the notes that were left from the supervisor I also advised that it is subject to underwriting he may be approved and he may not be approved.

Agt PEGGY PINNELL, 40-1913 are we able to write a letter to the PI from our legal department to advise that the contents on the original term application LF-2573-9762 and TC app/advising policy LF-2805-9088 are legally binding documents and that we cannot make an exception to go back and add WPD, even if new policy LF-2597-7997 has the rider? The agent is being harassed and has been threatened with legal action, looking for guidance or a solution to effectively silence the insured if possible

Joe Clemons (P/O) called because this number was on his caller ID. Located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left him a vrn with her direct number which I do not have access to. He was ending and didn't check his messages, just called the number that showed on his caller ID

Joe Clemons LF-2805-9088 FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 5.6% on his annual notice. 112805-1344 AUAS - SR for WPD claim. Wanting to speak w/ Public Affairs?

JOE CLEMONS - PO verified, LF-2805-9088 - Total accumulated = \$13,571.53, loan avail = \$49,348.32, no TG. Variable 5% interest rate. Interest accrues daily, but billed once a year on anniversary. Thinking about adding \$25K. Advised 6% of \$25K is \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If payments made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified loan 4% guaranteed CV rate. AM statement shows accum divs at 3.6%. Was in the middle of explaining that accum divs do not equal or offset the CV so came at a diff percentage (correct/guaranteed) - phone cut out in middle of convo, the call back phone #.

JOE CLEMONS - confirmed PO - 112805-9088 - confirmed \$13,571.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per rep proposal not less than 3% and currently earn 3.6% loan interest 5% variable per current rates and non-guaranteed values

AGT JACK TANKERSLEY, 40-1397, wanting to know the interest rate on the loan, 5.6% wanting to know what interest rate is on the accumulated dividends adv 3.6%

JOE CLEMONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anniv (6/7/16), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anniv (8/21/16), will be sent out around 8/1, no divs currently

JOE CLEMONS PO verified LF-2805-9088 PO wanted the CV 7471.95 76-0 all 5/7/16 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the revised illustration - he is certain he saw something that said it could be as much as 6%. But he is not able to locate the paper. Found revised illustration in Imaging 7/7/16. He wanted a copy of the revised illustration to be faxed to him at fax #843-753-7024 SR to SBC-WINKREQ-LAC-APP #72APD RE: PO is requesting a copy of the XSI generated 07/07/2010 in ISBT, but a regular PPR w/o changes should display the same information. Please mail to address on file as faxing the illustration may not follow our guidelines. Will be mailed to address on file.

Agt PEGGY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an attorney to try to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2006. Sent Siebel email to CLAIMS

JOE CLEMONS verified as PO find out what is the values in my life insurance. 1128061344 \$159.05 accumulated dividends, 11,174.27 available as a loan 115977997 31.50 accumulated dividends, \$15,414.61 112805-9088 \$16,009.50 accumulated dividends, \$67,556.93 available as a loan, \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

PO JOE CLEMONS, verified, 112805-9088, 15 PL, loan available as of 4/18/19 Maximum loan available: \$67,594.51. Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO informs of being chastised by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO

JOE CLEMONS, PO, verified, LF-2805-9088 wanting to know what divs are avl for him to take out. Adv there are accums of \$16,009.50. Adv should request the funds through the agt office. Wants his policy to be transferred to a different agency. Transferred him to the agent selection line. LF-2805-1344 wanting to know what funds are avl on the policy. Adv there are accums of \$1,159.05 and a loan avl of \$11,247.71. Adv should request through agt office.

JOE CLEMONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed. I advised PO that I would send request up to a TM to verify what was happening with req to change servicing agt as per trio note 02-28 any contact by PO needs to be sent to Compliance Rachael Gomez (OSHC) sent Siebel email

PO JOE CLEMONS verified. Lost the call when trying to get the number to Agent Assignment

Agt PEGGY PINNELL, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

Agent PEGGY PINNELL (40-1913) called for the special monthly premium with WPD. I advised approximately \$682.85

A/S CHRISTINA WYNIDHAM, 40-1913 112805-9088 transferred to life compliance

112805-9088 A/S MELISSA OWENS, 40-1913, calling to state agt is requesting copy of rbl from 7/2010 be emailed to her. emailed to e/s

Joe, PO VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

What was in that place.

1038 Policyowner/Insured, Joe Clemons, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan.

18 10 yr certain Belinda Policyowner/Insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.6%, int rate is variable. Trans to Belinda, for assistance with annuitizing.

Peggy 2805-9088 2573-9762 Agent, Peggy Pinnell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol, can't add WPD rider to this 15 pay life, could do a COP to a pay life to add WPD, would be fully underwritten, and needed signed since RL noted yes WPD but couldn't be issued on pol w/o add and und.

ISTINA WYNDHAM, 40-1913, 1734665336 wants to reinstate, 70.50, 4/25 A/S CHRISTINA WYNDHAM, 40-1913 172805-9088, cash value

ISTINA WYNDHAM, 40-1913 walked her to paid in advance tool thru box for a new business app she wasn't 100% sure of the amount of coverage that was desired wanted current ill emailed to her at (IA3Y)

ion, Policyowner/Insured verified by telr 1 regarding decreasing the DB and how that will affect the CV warning in the future. LF-2805-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run or other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

und called 40-1913 advised that how the dividends work. Current option is accum, advised that dividends sit on policy as cash and earn interest. They can be taken out at any time, or they are paid to bene at the death of in addition to the face amount. They are a separate number from the cash value, which is the value of the base policy.

Clemons verified request for Illustration to be mailed. Verified address.

illed in regarding why he did not get WPD. I looked on the original app (2573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to Rheumatoid Arthritis. Joe had specific questions, so I him to call his agent for further assistance.

ISTINA WYNDHAM, 40-1913, calling in regards to seeing why the app was declined. RA: *the date this never happens a big lie and what is the date*
GY PINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the PO/PI applied for WPD. Advised that previous rep that spoke to PO/PI advised that it was not on original app but when the PO/PI did a version on this policy the request was to have WPD. There is a signed AMD on this policy that advised PO/PI was aware that they issued without WPD. Sent AO copy of RL submitted with WPD requested.

ions PO verified, 172805-9088 Clemons would like to email. Joe Clemons, PO verified, LF-2805-9088 asking if WPD was on policy? adv. no, adv. there is a signed AMD stating it issued with no WPD. Asking how much is approx would PO have at 15 years of having policy \$35,000. Cash value after 15 years \$180,000. Based on what PO pays now and at the end 15 years will have paid 152,450.00 Joe Clemons, PO verified, LF-2805-1344 called. At the end of the 15 years what will be approx cash value \$28,036.00 and accum dividends \$2052.00. Based on what PO pays now and at the end 15 years will have paid \$31,322.00

ions PO LF-2805-9088 received a sup. adv. PO is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once it was issued. Per notes looks like never original app and then put it on there on TC app and was denied. I explained would get to a T/I to review and see what we can do and follow up with him.

mons, JNSD spoke w/ Patrick Ordery yesterday, he said Patrick called him back and requested that he call in. Adv I can't assist with his policy since I am in the Health Response Center, I can get him to a supervisor but not direct, adv could get him to the LAC to assist. He disconnected the call.

ISTINA WYNDHAM, 40-1913, calling to see what a supervisor advised the notes that were left from the supervisor. Also advised that it is subject to underwriting he may be approved and he may not be approved.

GY PINNELL, 40-1913, was unable to bring to write a letter to the PI from our legal department to advise that the contract on the original term application LF-2573-9762 and TC app existing policy LF-2805-9088 are legally documents and that we cannot make an exception to go back and add WPD, even if new policy LF-3597-7997 has the rider. The agent is being harassed and has been threatened with legal action, looking for guidance of a legal office to advise the insured if possible.

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mons LF-2805-9088 FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.6% on his annual notice. LF-2805-1344 ALIAS - SRIF for WPD claim. Wanting to Public Affairs.

MONS PO verified LF-2805-9088 - total accum divs = \$19,524.53 loan avail = \$49,348.12, no TG, variable 5% interest rate. Interest accrues daily, but billed once a year. Currently thinking abt taking \$25K. Advised 5% of \$25K is \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If pymts made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified guaranteed CV rate. AN statement shows accumulation at 3.6% was in the middle of explaining that accum divs do not equal or differ at the CV so same at a diff percentage (current/guaranteed) - phone cut out in middle of to call back phone.

MONS confirmed PO LF-2805-9088 confirmed \$19,511.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per proposal not less than 3% and currently earn 3.6% loan interest 5% on current rates and non-guaranteed values.

KTALEXSLEY, 40-1397, wanting to know the interest rate on the loan, adv 5% wanting to know what interest rate is on the accumulated dividends, adv 3.6%.

MONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to ann (8/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to ann (8/22/18), will be around 6/1, no divs currently.

MONS PO verified LF-2805-9088 PO wanted the CSV 74728.95 7640.81 5/7/18 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for loan divs is not less than 3% per the illustration - he is certain he saw something that said it could be as much as 6%, but he is not able to locate the paper. Found revised illustration in Imaging 7/7/10. He wanted a copy of the revised illustration to be faxed to ex 8243-757-7014 - SR to SBCA WYNDHAM LRC APD. **TAPO HE PO is requesting a copy of the RL generated 07/07/2010 in LSCIT, but a regular PPA w/ no changes should display the same information. Please mail to address. Faxing the illustration may not follow our guidelines. Will be mailed to address on file.

GY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an r to try to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2005. Sent Siebel email to CLAIMS.

MONS verified as PO find out what is the values in my life insurance. LF28051344 \$159.05 accumulated dividends \$11,174.27 available as a loan LF35977997 \$1,500 accumulated dividends \$15,414.61 LF28059088 \$16,009.50 accumulated dividends \$67,566.93 available as a loan. \$4081.45 once terminated it can not be reinstated and there is no taxable gain.

CLEMONS verified, LF28059088, 15 PL loan available as of 4/18/19 Maximum loan available: \$67,594.51 Taxable gain: \$0.00. Annual loan interest will be charged, PO informs relationship with AO is not well. PO inform of satisfied by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expending money, advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO.

MONS PO verified, LF-2805-9088 wanting to know what divs are adv for him to take but I adv there are accum of \$16,009.50, I adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent's selection line. LF-2806-1344 wanting to know what funds are adv on the policy, I adv there are accum of \$1,159.05 and a loan adv of \$11,347.21. I adv should request through agt.

MONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed I advised PO that I would send request up to a TM to verify what was ing with req to change servicing agt as per telr note 02-28 any contact by PO needs to be sent to Compliance Rachael Gomez (DSHQ) sent Siebel a mail.

CLEMONS verified: Lost the call which trying to get the number to Agent Assignment.

GY PINNELL, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

EGGY PINNELL (40-1913) called for the special monthly premium with WPD, I advised approximately \$882.65.

ISTINA WYNDHAM, 40-1913, LF28059088 transferred to life compliance.

088 A/S MELISSA OVAIS, 40-1913, calling to state agt is requesting copy of RL from 7/2010 be emailed to her. emailed to a/s.

VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

Common Pleas

Clerk : Leah Guerry Dupree

300 B California Avenue

Moncks Corner, SC 29461

Phone:(843) 719-4400 Fax:(843) 719-4509

Received From: Clemons, Joe
2202 Adiddas St.
Eutawville, SC 29048

Date: 8/31/2022
Receipt #: 6113515
Clerk: c08slovin

Paying for: Self
Transaction Type: Payment

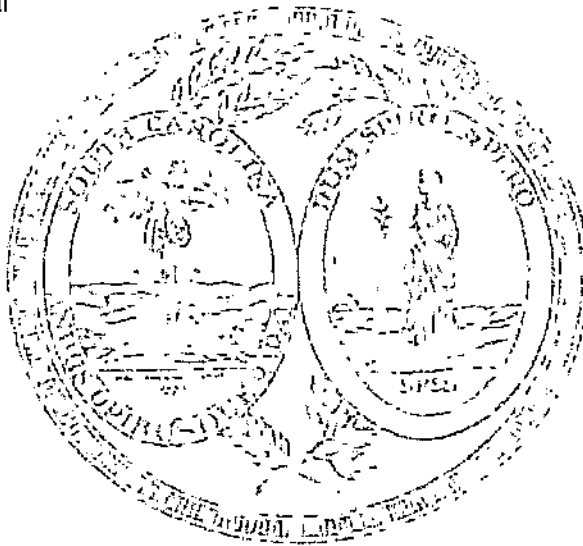
Payment Type: Cash \$25.00
Total Paid: \$25.00

Reference #:
Comment:
Non-Refundable

You may check the status of your Berkeley case at:

<http://www.sccourts.org/caseSearch/>

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2021CP0802709	Joe Clemons VS Home Telecom Company , defendant, et al	\$25.00	\$25.00	\$0.00



Total Cases:	1	\$25.00	\$25.00	\$0.00
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STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

Joe Clemons,

Plaintiff,

vs.

Home Telecom Company, and William S
 Helmly, President & CEO,

Defendant.

IN THE COURT OF COMMON PLEAS
 FOR THE NINTHTH JUDICIAL CIRCUIT

CASE NO: 2021-CP-08-02709

**ORDER DENYING MOTION FOR
 RECONSIDERATION PURSUANT TO
 RULE 59(e)**

The Plaintiff filed a motion asking this Court to reconsider its Order dated August 8, 2022 granting Defendants’ Motions to Dismiss. Plaintiff’s motion filed on August 31, 2022 asks this Court to reconsider the Order and allow Plaintiff to pursue its claims against the Defendants. For the reasons set forth below, the motion to reconsider is DENIED.

STANDARD OF REVIEW

“Rule 59(e) of the South Carolina Rules of Civil Procedure provides, ‘A motion to alter or amend the judgment shall be served not later than 10 days after receipt of written notice of the entry of the order.’” *Gobbi v. People’s Fed. Bank*, No. 2006-UP-245, 2006 S.C. App. Unpub. LEXIS 231, at *11 (Ct. App. May 16, 2006) (quoting Rule 59(e), SCRCPP). Motions for reconsideration will not be granted absent “highly unusual circumstances.” *U.S. ex rel. Becker v. Washington Savannah River Co.*, 305 F.3d 284, 290 (4th Cir. 2002) (stating that simple disagreements with the court’s ruling will not support Rule 59(e) relief).¹ Courts have recognized three circumstances in which a court should grant a Rule 59(e) motion: (1) to accommodate an

¹ Rule 59 is substantially the same as the Federal Rule. *See Elam v. S.C. Dep’t of Transp.*, 361 S.C. 9, 21, 602 S.E. 2d 772, 779 (2004) (“Rule 59(e) in the South Carolina and federal rules of civil procedure is practically identical.”).

intervening change in controlling law; (2) to account for new evidence not available at trial; or (3) to correct a clear error of law or prevent manifest injustice.” Hutchinson v. Staton, 994 F.2d 1076, 1081 (4th Cir. 1993). Importantly, a motion for reconsideration is not a vehicle to re-litigate previously raised issues or “to raise argument or present evidence that could have been presented prior to the entry of judgment.” Dash v. Mayweather, C/A No. 3:10-1036-JFA, 2010 U.S. Dist. LEXIS 95277, *2 (D.S.C. Sept. 13, 2010) (quoting Exxon Shipping Co. v. Baker, 554 U.S. 471, n.5 (2008)). In other words, “[a] party cannot use Rule 59(e) to present to the court an issue the party could have raised prior to judgment but did not.” Stevens & Wilkinson of S.C., Inc. v. City of Columbia, 409 S.C. 563, 567, 762 S.E.2d 693, 695 (2014); Patterson v. Reid, 318 S.C. 183, 185, 456 S.E.2d 436, 437 (Ct. App. 1995). Nor does “[a] party’s mere disagreement with the court’s ruling . . . warrant a Rule 59(e) motion.” In re Pella Corp. Architect & Designer Series Windows Mktg., Sales Practices & Prods. Liab. Litig., 269 F.Supp. 3d 685, 691 (D.S.C. 2017); *see also* Lyons v. Fid. Nat’l Title Ins. Co., 415 S.C. 115, 135, 781 S.E.2d 126, 137 (Ct. App. 2015).

After consideration of the issues raised in the parties’ memorandums, Plaintiff’s Motion to Reconsider pursuant to Rule 59(e) is DENIED.

AND IT IS SO ORDERED.

ELECTRONIC SIGNATURE PAGE TO FOLLOW



Berkeley Common Pleas

Case Caption: Joe Clemons VS Home Telecom Company , defendant, et al

Case Number: 2021CP0802709

Type: Order/Relief

It is so ordered.

/s Roger M. Young, Sr. S.C. Circuit Judge 2134

RECEIVED

Mar 19 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
Honorable Daniel Coble, Circuit Court Judge

Appellate Case No. 2023-000460

Joe Clemons.....Appellant

v.

William S. Helmly/President & CEO of Home Telecom Co. Respondent

RESPONDENT'S MOTION TO DISMISS

Respondent William S. Helmly/President & CEO of Home Telecom Co. moves, pursuant to Rule 260 of the South Carolina Appellate Court Rules and the Court of Appeals' February 7, 2024 Order to dismiss this appeal.

Appellant filed his Notice of Appeal on March 20, 2023. Appellant's Initial Brief was filed on August 10, 2023, and Respondent's Initial Brief was filed on September 11, 2023. Thereafter, Appellant filed two motions for extension of time to file the Record on Appeal, and those extensions were granted. In an Order filed November 16, 2023, the Court notified Appellant that "[t]he time for serving and filing the record on appeal is hereby extended until December 13, 2023. No further extensions will be granted absent extraordinary circumstances."

On December 14, 2023, Appellant filed a Record on Appeal, which did not contain a number of documents designated by the parties in their Initial Briefs. Appellant later filed a revised Record on Appeal on December 15, 2023; however, that revised record is also deficient, in that it does not contain a number of documents designated by Appellant and Respondent. The documents missing from the Record on Appeal include:

1. Motion to Dismiss
2. Documents produced by Plaintiff at July 18, 2022 hearing

3. November 16, 2022 Motion to Dismiss or Alternatively, for Judgment on the Pleadings, and Motion for Sanctions
4. March 3, 2023 Response to Plaintiff's Motion to Reconsider
5. March 10, 2023 Order

Given the deficient record, Respondent filed a Motion to Correct the Record on Appeal and Motion for Extension of Time to File Final Brief on January 10, 2024. On February 7, 2024, the Court granted Respondent's motion and ordered the following:

Within twenty days of the date of this order, Appellant shall serve and file a supplemental record on appeal that includes all documents designated by the parties, which were omitted from the previously filed record on appeal. Thereafter, the parties shall serve and file their amended final briefs within ten days of service of the supplemental record on appeal. Failure to comply may result in dismissal of this appeal.

More than thirty days¹ have elapsed since the Court of Appeals' February 7, 2024 Order, and Appellant has failed to comply with the order, as Appellant has not filed a supplemental record on appeal. Instead of filing a corrected Record on Appeal, Appellant sent the Clerk of the Court of Appeals multiple letters, in which Appellant stated he was "requesting that this motion be dismissed and let it go to the appellate court for a decision." Appellant also requested "an abeyance until this issue is addressed." On February 28, 2024, the Court issued an Order, which stated the following:

On December 15, 2023, Appellant filed the record on appeal. On January 10, 2024, Respondent filed a motion to correct the record on appeal because the record failed to "contain all documents designated by Appellant and Respondent." On February 7, 2024, this court granted Respondent's motion and ordered Appellant to serve and file a supplemental record on appeal containing all documents designated by the parties, which were omitted from the previously filed record on appeal within thirty days of the order. The order further allowed the parties to file amended final briefs within twenty days of the date of service of the supplemental record on appeal. On February 22, 2024, and February 26, 2024, Appellant

¹ The Court of Appeals' February 7, 2024 order stated that Appellant had "twenty days of the date of this order" to serve and file the supplemental record; however, the Court of Appeals' February 28, 2024 order referenced the February 7, 2024 order and stated the order gave Appellant "thirty days" to "file a supplemental record on appeal containing all documents designated by the parties, which were omitted from the previously filed record on appeal." Regardless of whether Appellant had twenty or thirty days to comply with this order, more than thirty days have elapsed and Appellant has failed to comply.

wrote letters to this court requesting Respondent's motion to correct the record on appeal "be dismissed." We construe these letters as a petition to rehear the order granting the motion to correct the record on appeal. After careful consideration, we take no action on the petition for rehearing because the order granting the motion to correct the record on appeal did not dismiss or finally decide the appeal. *See* Rule 221(c), SCACR ("The appellate court will not entertain petitions for rehearing on a motion or petition unless the action of the court on the motion or petition has the effect of dismissing or finally deciding a party's appeal.").

Rule 260 of the South Carolina Appellate Court Rules provides "Whenever it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court." Appellant has failed to comply with Rule 210, SCACR, which governs the Record on Appeal.² *See* Rule 210(a), SCACR ("Within thirty (30) days after service of the last brief, the appellant shall serve a copy of the Record on Appeal on each party who has served a brief."); Rule 210(c), SCACR ("The Record on Appeal shall include all matter designated to be included by any party under Rule 209 and shall comply with the requirements of Rule 267."); *Henning v. Kaye*, 307 S.C. 436, 437, 415 S.E.2d 794, 794 (1992) ("[T]he South Carolina Appellate Court Rules are not mere technicalities but provide the parties and this Court with an orderly mechanism through which to guide appeals in this State."); *Wise v. S.C. Dep't of Corr.*, 372 S.C. 173, 174, 642 S.E.2d 551, 551 (2007) ("Whenever it appears that an appellant has failed to comply with the requirements of the SCACR, an order of dismissal shall be issued."); *Camp v. Camp*, 378 S.C. 237, 240, 662 S.E.2d 458, 459 (Ct. App. 2008), rev'd, 386 S.C. 571, 689 S.E.2d 634 (2010) ("The clerk shall dismiss the appeal of a party who fails to comply with the Rules, and the case 'shall not be reinstated except by leave of the court, upon good cause shown, after notice to all parties.'" (internal citation omitted)).

² Respondent also notes that Appellant failed to comply with Rule 211, SCACR. Rule 211 states that final briefs are to be "identical to the brief(s) previously served under Rule 208, except for the following: (1) References to the Record . . . [and] (2) Correction of Typographical Errors and Misspellings." However, on February 5, 2024, Appellant filed a "Final Brief" that contained sweeping substantive changes in comparison to Appellant's Initial Brief. However, despite Plaintiff filing a document titled "Final Brief," neither party can presently file a final brief that complies with Rules 210 and 211, SCACR, because Appellant has not filed a corrected record on appeal.

Despite having filed this appeal nearly one year ago, and despite all parties' initial briefs having been filed by September 11, 2023, Appellant has failed to comply with both the Court's February 7, 2024 order and the South Carolina Appellate Court Rules. Appellant has had ample time to correctly file a record on appeal yet has failed to do so, which has prevented the parties from being able to file Final Briefs that comply with Rule 211, SCACR, and further prevents the appellate court from being able to consider the issues on appeal. *See* Rule 210, SCACR ("Except as provided by Rule 212 and Rule 208(b)(1)(C) and (2), the appellate court will not consider any fact which does not appear in the Record on Appeal."). As such, the dismissal of Appellant's appeal is warranted.

Respectfully submitted,

/s/ Robert E. Kneece III

Robert E. Kneece III
Turner Padget Graham & Laney, P.A.
Post Office Box 22129
Charleston, South Carolina 29413
Direct: 843-576-2829
Fax: 843-577-1639
RKneece@TurnerPadget.com

March 19, 2024

ATTORNEYS FOR RESPONDENT

RECEIVED

Mar 19 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM BERKELEY COUNTY

Court of Common Pleas

Honorable Daniel Coble, Circuit Court Judge

Appellate Case No. 2023-000460

Joe Clemons.....Appellant

v.

William S. Helmly/President & CEO of Home Telecom Co. Respondent

PROOF OF SERVICE

The undersigned, an attorney in this matter for Respondent, certifies that on **March 19, 2024**, I have served copies of **Respondent's Motion to Dismiss** upon Joe Clemons, Pro Se Appellant via certified U.S. Mail and e-mail to Joe Clemons, 2202 Addidas Street, Eutawville, SC 29048; clemonswelding1@gmail.com

/s/ Robert E. Kneece III

Robert E. Kneece III

Turner Padget Graham & Laney, P.A.

Post Office Box 22129

Charleston, South Carolina 29413

Direct: 843-576-2829

Fax: 843-577-1639

RKneece@TurnerPadget.com

ATTORNEYS FOR RESPONDENT

FORM 8
LETTER TO THE APPELLATE COURT CLERK
FILING THE NOTICE OF APPEAL

RECEIVED
Mar 20 2023
SC Court of Appeals

March 17, 2023

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

The Honorable Patricia A. Howard
Clerk, Supreme Court of South Carolina
Post Office Box 11330
Columbia, South Carolina 29211

RE: William S. Helmly, President & CEO, Home Telecom Company,
Respondent, v. Joe Clemons, Appellant, Case No. 2022-CP-082427

Dear Ms. Kitchings [Ms. Howard]:

Enclosed for filing is a notice of appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the notice of appeal on the respondent.
- (2) A copy of the order which is to be challenged on appeal.
- (3) A filing fee of \$250.00
- (4) This appeal is being filed with the Supreme Court because at Lower Court, the Judge did not have a good understanding of the truth and facts of this because Judge Roger Young has been the judge in a previously filed case concerning the same things but had a difference compliant and some different exhibits, case #2021-CP-08-02709 filed 12-31-2021. In this particular case 2022-CP-08-02427, the new Judge Daniel Coble did not and could not review the things that I had filed, because Judge Coble did not come to the courthouse where all papers and a CD were filed, because even if the judge has them e-mailed to him the scan copies were not legible and he could not listen to the CD that was more proof in helping him get a good understanding of the case. Also, the Lawyer that was at the hearing with me before Judge Roger Young is not the same lawyer that has been writing and informing judge Coble. For these reasons and much more I believe this case needs to be before the appellate court.

s/Joe Clemons

Joe Clemons, Appellant, *Pro se*

2202 Addidas Street

Eutawville, SC 29048

T: (843) 753- 7007

Clemonswelding1@gmail.com

cc:

Robert E. Kneece, III

Turner Padget Graham & Laney, P. A.

40 Calhoun Street Suite

200 Charleston, SC 29401

Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
Mar 20 2023
SC Court of Appeals

APPEAL FROM BERELEY COUNTY
Court of Common Pleas

Daniel Coble, Circuit Court Judge

Case No. 2022-CP-082427

Joe Clemons, Appellant,

v.

William S. Helmly, President & CEO,

Home Telecom Company

(jointly and severally liable),

Respondent.

PROOF OF
SERVICE

I certify that I have served the Notice of Appeal on William S. Helmly, President & CEO, Home Telecom Company (jointly and severally liable) by depositing a copy of it in the United States Mail, postage prepaid, on March 17, 2023, addressed to his attorney of record, Turner Padgett Graham & Laney, P. A. Robert E. Kneece, III by personally delivering a copy of it to his attorney of record, Robert E. Kneece III, 40 Calhoun Street Suite 200 Charleston, SC 29401 on March 17, 2023, or by e-mail.

s/Joe Clemons

Joe Clemons, Appellant, *Pro se*
2202 Addidas Street
Eutawville, SC 29048
T: (843) 753- 7007
Clemonswelding1@gmail.com

FORM 9
LETTER TO CLERK OF LOWER COURT
FILING NOTICE OF APPEAL

RECEIVED
Mar 20 2023
SC Court of Appeals

March 17, 2023

The Honorable Leah Guerry Dupree
Clerk of Court for Berkeley County
Post Office Box 219
Moncks Corner, South Carolina 29461

RE: William S. Helmly, President & CEO, Home Telecom Company,
Respondent, v. Joe Clemons, Appellant, Case No. 2022-CP-082427

Dear The Honorable Leah G. Dupree:

Enclosed for filing is a notice of appeal in the above case.

Sincerely,

s/Joe Clemons
Joe Clemons, Appellant, *Pro se*
2202 Addidas Street
Eutawville, SC 29048
T: (843) 753- 7007
Clemonswelding1@gmail.com

cc:
Robert E. Kneece, III
Turner Padget Graham & Laney, P. A.
40 Calhoun Street Suite
200 Charleston, SC 29401
Attorney for Respondent

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF BERKELEY	)	Docket No.: 2022-CP-08-02427
JOE CLEMONS,	)	
	)	
Plaintiff,	)	<u>DEFENDANTS' RESPONSE TO</u>
	)	<u>PLAINTIFF'S MOTION TO</u>
v.	)	<u>RECONSIDER ORDER GRANTING</u>
	)	<u>DEFENDANTS' MOTION TO</u>
	)	<u>DISMISS</u>
WILLIAM S. HELMLY, PRESIDENT &	)	
CEO, HOME TELECOM COMPANY	)	
(JOINTLY AND SEVERALLY LIABLE),)	)	
	)	
Defendant.	)	

In response to Plaintiff's Motion to Reconsider Order Granting Defendants' Motion to Dismiss, Defendants state as follows:

In his Motion to Reconsider, Plaintiff alleges "You are not accurate in your statement that this complaint is exactly the same as the one of 10-7-2022 that came before Judge Young, I believe that statement came from the defendant." This claim is clearly contradicted by the plain language of the Complaints filed in this lawsuit and in the prior lawsuit, which was captioned *Joe Clemons v. William S. Helmlly, President & CEO, Home Telecom Company (jointly and severally liable)* (2022-CP-08-02427) (hereinafter "First Lawsuit"). Those Complaints are identical. As stated in the Court's February 6, 2023 Order Granting Defendants' Motion to Dismiss, this lawsuit was properly dismissed, as Plaintiff's Complaint "does not state a valid claim upon which relief can be granted because Judge Young already dismissed an identical complaint in August 2022."

Defendants also note that Plaintiff continues to advance the inaccurate claim that Judge Young's August 8, 2022 Order was written by Defendants' counsel. Judge Young did not ask for either party to submit proposed orders, and Defendants' counsel never submitted a proposed order to Judge Young.

Aside from making the patently incorrect claim that the Complaints in the First Lawsuit and the present lawsuit are not identical, Plaintiff's Motion to Reconsider does not address any of the grounds upon which the Court based the dismissal. Instead, Plaintiff simply states "I hope that you will allow me to proceed with this case to hold Home Telecom accountable for their crime and misconduct." The remainder of Plaintiff's arguments within his Motion to Reconsider are the same arguments Plaintiff has advanced on numerous occasions, both in the First Lawsuit and in the present lawsuit. All of these arguments have been considered by the Court and rejected, multiple times. A motion for reconsideration is not a vehicle to re-litigate previously raised issues or "to raise argument or present evidence that could have been presented prior to the entry of judgment." *Dash v. Mayweather*, No. 3:10-1036-JFA, 2010 U.S. Dist. LEXIS 95277, at *2 (D.S.C. Sep. 13, 2010); *see also Consulting Eng'rs, Inc. v. Geometric Software Sols. & Structure Works LLC*, No. 1:06cv956 (JCC), 2007 U.S. Dist. LEXIS 49398, at *4 (E.D. Va. July 6, 2007) ("A party's mere disagreement with the court's ruling does not warrant a Rule 59(e) motion, and such motion should not be used to 'rehash' arguments previously presented or to submit evidence which should have been previously submitted.").

Additionally, Plaintiff's motion fails to satisfy the provisions of Rule 7, SCRCF, in that it does not state with particularity the grounds upon which he seeks relief. See Rule 7(b)(1), SCRCF ("An application to the court for an order shall be by motion which, unless made during a hearing or trial in open court with a court reporter present, shall be made in writing, shall state with particularity the grounds therefor, and shall set forth the relief or order sought."); *Camp v. Camp*, 378 S.C. 237, 240, 662 S.E.2d 458, 459-460 (Ct. App. 2008) (stating a motion to reconsider, alter, or amend judgment under Rule 59(e), SCRCF, that fails to specifically set forth the grounds for the motion is insufficient under Rule 7(b)(1), SCRCF). In addition to Plaintiff's motion failing to identify any legitimate basis for the Court to reconsider its Order, the Court did in fact correctly grant Defendants' Motion to Dismiss for all of the reasons set forth in the Order.

Finally, Defendants note that the present motion represents yet another meritless filing by Plaintiff that is frivolous on its face and cannot have been filed in good faith. These repeated filings, which include a subpoena Plaintiff recently served on Defendants twenty-two days after the Court filed its order dismissing this case¹, serve no legitimate purpose, impose an undue burden and expense on Defendants, and inflict annoyance and harassment upon Defendants. Defendants believe that Plaintiff's continued filing of frivolous pleadings, motions, and/or documents, to include the Motion to Reconsider at issue, would justify an award of sanctions pursuant to our state's Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §

¹ Defendants are filing a Motion to Quash Subpoena.

15-36-10(A)(4). To the extent the Court is inclined to award sanctions, Defendants would respectfully request that those sanctions include the sanction that Plaintiff is not to file any additional pleadings, motions, or documents in this matter or any subsequent action pertaining to the claims at issue unless he either (a) is represented by an attorney licensed to practice in South Carolina who appears on his behalf or (b) the pleading, motion, or document contains a certification from an attorney licensed to practice in the state of South Carolina stating that the attorney has reviewed the pleading, motion or documents and determined it is not frivolous. Plaintiff's repeated frivolous and unwarranted filings have caused Defendants to incur fees and costs, including but not limited to attorney's fees and filing fees, in addition to annoyance and harassment.

Based on the foregoing, Defendants respectfully request that the Court deny Plaintiff's Motion for Reconsideration.

Turner Padget Graham & Laney P.A.

/s/ Robert E. Kneece, III

Robert E. Kneece, III (SC Bar No.: 101279)

40 Calhoun Street, Suite 200 (29401)

P.O. Box 22129

Charleston, SC 29413

Telephone: (843) 576-2829

Facsimile: (843) 577-1639

Email: rkneece@turnerpadget.com

Charleston, South Carolina

March 3, 2023

ATTORNEYS FOR DEFENDANTS

STATE OF SOUTH CAROLINA)
COUNTY OF BERKELEY) IN THE COURT OF COMMON PLEAS
JOE CLEMONS) NINTH JUDICIAL CIRCUIT
) Civil Action No. 2021-CP-08-02709
Plaintiff,)

Vs.

PLAINTIFF'S MOTIOM REQUESTING
JUDGE YOUNG RECONSIDER HIS RULING
OF 8-8-2022, ON

)
) DEFENDANT'S MOTION TO DISMISS
WILLIAM S. HELMLY, PRESIDENT & CEO,)
HOME TELECOM COMPANY (jointly)
and severally liable),)
Defendants)
_____)

2022 AUG 31 PM 4:39
LEAH GUEARY, CLERK
CLERK OF COURT
BERKELEY COUNTY, SC

FILED

To the Honorable Judge Roger Young, it is with great joy, hope and anticipation that I can come before you sir, and to write this **Reconsideration and Request** to inform and remind you of the issues concerning this case. On January 11, 2021, I came before you with two motions (Case No: 2019-CP-08-00424). One was to extend the deposition period so I could depose two people, and one of the two was Mr. Willam S. Helmly, President, and CEO of Home Telecom Company. The second motion was to add Home Telecom Company to the Lawsuit that I had against State Farm, as a co-conspirator, because Home Telecom was helping State Farm to cover their crime of forgery, where State Farm forge my name on documents. During the virtual hearing of the case, you granted both motions. This case against Home Telecom that is before you today is because Home Telecom has refused to provide my full accurate telephone records that I requested on three separate occasions and paid for. I had requested my records multiple times because the records Home Telecom provided showed no calls between myself and State Farm. However, when my phone records were provided to me by State

cc: J.C.

SPH

Farm's records showed that I called many times. Further, I have received letters from State Farm's corporate and local offices wherein they stated I called multiple times. The S.C. Department of Insurance contacted State Farm Agency and State Farm stated to the Department of Insurance that I had made multiple calls to the local and corporate offices. This proves that calls were made because State Farm's records and letters showed they had received these calls, but Home Telecom's records did not show I made any calls to State Farm from March 1-May 31, 2017. My phone records are important to validate that I spoke to State Farm representatives which are needed to win my case.

I presented this information to you during the January 11, 2021, hearing and you granted my motion to add Home Telecom as a co-conspirator and to depose Mr. William S. Helmly, which I did. In the deposition, Mr. Helmly revealed that he and State Farm Agent, Mrs. Peggy Pinnell were neighbors. He also stated that when calls are made, they are permanently stored in the company's server. Despite this, Home Telecom to this day has refused to provide me with my full, accurate telephone records. This is a breach of contract, violation of privacy, a federal crime, and an obstruction of justice.

Judge Young, I hope that you will allow me to proceed with this case to hold Home Telecom accountable for their crime and misconduct. I'm submitting this motion asking you sir, to please reconsider your ruling of Aug. -8-2022, wherein you ruled to dismiss my complaint against Home Telecom and Mr. William Helmly. At that hearing on 7-19-2022, I provided sufficient explanation and proof, and two exhibits, and certified mailed. The Order that was send to me on 8-8-2022, of that ruling did not reflect or acknowledge anything that show that I was even present and certainly not any of my proofs and exhibits. Sir, that Order that was written seem to have been written up by the opposing counsel, as to a repeat to what was done on 1-11-2021, hearing when you allowed the opposing party to write up the form 4 and the Order, where they change your ruling of one of my motions you granted and changed one to denied. It seems like it has happened again, because that Order that was written on 8-8-2022, have almost the identical things in it as to what the opposing party presented in memorandum and brief, even down to the foot notes. So, in my **CONCLUSION**, I'm asking you to please reconsider that Ruling and Order that was made on 8-8-2022 and Denied that Motion to dismiss my case against HOME TELECOM AND WILLIAM HELMLY.

From the Desk of Joe Clemons

By: Joe Clemons


Pro Se Litigant

E-Mail: clemonswelding1@gmail

2202 Addidas St.

Eutawville, SC 29048

(843) 753-7007

August 30, 2022.

STATE OF SOUTH CAROLINA

COUNTY OF

Berkeley

Joe Clemens

Plaintiff,

vs.

William S. Helmly, President & CEO, Home Telecom Company (Jointly) and Severally liable,

Defendant.

IN THE COURT OF COMMON PLEAS
9th JUDICIAL CIRCUIT

CASE NO.: 2021-CP-08-02709

MOTION AND ORDER INFORMATION
FORM AND COVERSHEET

Plaintiff's Attorney:

Joe Clemens Pro Se Bar No. none

Address:

2202 Addidas St, Eutawville, SC

Phone: 843-753-7007 Fax: 29048

E-mail: Clemenswelding@gmail.com

Defendant's Attorney:

Address:

Phone:

E-mail:

- ☐ MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and II)
☐ FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
☐ PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion: Asking Judge Young to Reconsider His Ruling of 8-8-22

Estimated Time Needed: 5 hr

Court Reporter Needed: ☒ YES ☐ NO

SECTION II: Motion/Order Type

- ☒ Written motion attached
☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

Joe Clemens

Signature of Attorney for ☒ Plaintiff / ☐ Defendant

8-31-22, 2022
Date submitted

SECTION III: Motion Fee

☒ PAID - AMOUNT: \$ 25.00

☐ EXEMPT:

(check reason)

- ☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status ☐ State Agency v. Indigent Party
☐ Sexually Violent Predator Act ☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)
☐ Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter: _____
☐ Other: _____

JUDGE'S SECTION

- ☐ Motion Fee to be paid upon filing of the attached order.
☐ Other: _____

JUDGE CODE _____

Date: _____, 20

CLERK'S VERIFICATION

Collected by: (Signature)

Date Filed: 8/31/2022, 2022

- ☒ MOTION FEE COLLECTED: \$ Cash 25.00
☐ CONTESTED - AMOUNT DUE: \$ _____

Two Exhibits

As follows, that

was handed to the

Judge on 7-18-2022

at hearing.

March 18, 2020

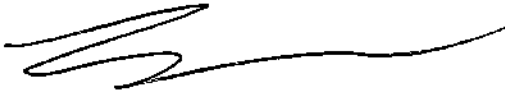
Joe A. Clemons
2202 Addidas Street
Eutawville, SC 29048

Dear Mr. Clemons,

This letter is to inform you that Home Telecom has reviewed our internal systems, processes, and controls. We have found no evidence of external or internal intrusion or tampering in our systems. We believe the data we provided to you in March of 2018 is complete and accurate.

We have spent considerable time, effort, and expense in conversation with you and in investigating per your request. Any subsequent requests related to this issue will require a valid subpoena.

Sincerely,



William S. Helmly
President & CEO
Home Telecom

Exhibit 2

[illegible]

038 Policyowner/Insured, Joe Clements, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan

18 10 yr certain Belinda Policyowner/Insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.5%. Int rate is variable. Trans to Belinda, loan or assistance with annuitizing.

Specy 2805-9088 2573-9762 Agent, Peggy Pinnell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol. can't add WPD rider to this 15 pay life. could do a COP to a pay life to add WPD. would be fully underwritten. and needed signed since RL noted yes WPD but couldn't be issued on pol w/o app and und.

ISTINA WYNHAM, 40-1913, 1/34665386 wants to reinstate. 70.90, 4/25 A/S CHRISTINA WYNHAM, 40-1913 1/2605-9088, cash value

ISTINA WYNHAM, 40-1913 walked her to paid in advance tool thru abs for a new business app she want's 100% sure of the amount or coverage that was desired, wanted current MI emailed to her at [A3V]

son, Policyowner/Insured verified by telr & regarding decreasing the DB and how that will affect the CV earning in the future. LF-2806-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run or other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

then called 40-1913, advised that how the dividends work. Current option is account, advised that dividend's sit on policy at cash and earn interest. They can be taken out at any time, or they are paid to bene at the death of red in addition to the face amount. They are a separate number from the cash value, which is the value of the base policy.

Clements verified request in force illustration to be mailed. verified address.

led in regarding why he did not get WPD. I advised on the original app (1573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to Rheumatoid Arthritis. Joe had specific questions, so I him to call his agent for further assistance.

ISTINA WYNHAM, 40-1913, calling in regards to seeing why the wpd was declined. RA *This never happen a big lie, and what is the date*

IGY PINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the PO/PI applied for WPD. Advised that previous rep that spoke to PO/PI advised that it was not on original app but when the PO/PI did a version on this policy the request was to have WPD. There is a signed AMD on this policy that advised PO/PI was aware that they issued without WPD. Sent AO copy of RL submitted with WPD requested.

son, PO verified, 1/28059088 Clements.wynham1@gmail.com Joe Clements, PO verified, LF-2805-9088 Asking if WPD was on policy? adv. no, adv. there is a signed AMD stating it issued with no WPD. Asking how much is approx. would PO have at 15 years of having policy \$35,081. Cash value after 15 years \$180,058. Based on what PO pays now and at the end of 15 years will have paid \$52,45.00. Joe Clements, PO verified, LF-2806-1344 Called At the end of the 15 years what will be approx. cash value \$28,036.00 and accum dividends: \$2052.00. Based on what PO pays now and at the end of 15 years will have paid \$31,321.00

son, P/O LF-2805-9088 received as a sup. P/O is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once TC was issued. Per notes looks like never original app and then put it on there on TC app and was denied. I explained would get to a 7/1 to review and see what we can do and follow up with him.

son, JINSO spoke w/ Patrick Daniels yesterday, he said Patrick called him back and requested that he call in. I adv I can't assist with his policy since I am in the Health Response Center. I can get him to a supervisor but not line CV/erl could get him to the LAC to assist. He disconnected the call.

ISTINA WYNHAM, 40-1913, calling to see what a supervisor advised the notes that were left from the supervisor. I also advised that it is subject to underwriting he may be approved and he may not be approved.

IGY PINNELL, 40-1913, are we able or willing to write a letter to the PI from our legal department to advise that the contract on the original term application LF-2573-9762 and TC app/existing policy LF-2805-9088 are legally documents and that we cannot make an exception to go back and add WPD, even if new policy LF-3597-7997 has the rider? The agent is being harassed and has been threatened with legal action, looking for guidance or a to effectively allude the insured if possible.

son, (PO) called because this number was on his caller ID. Located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left a with her direct number which I do not have access to. He was driving and didn't check his messages. Just called the number that showed on his caller ID.

son, LF-2805-9088, FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.6% on his annual notice. 1/28061344 ADAS - SR4F for WPD claim. Wanting to Public Affairs

MONS PO verified LF-2805-9088 - Total accum divs - \$13,321.53. Loan avail - \$49,348.32, no TG. Variable 5% interest rate. Interest accrues daily, but billed once a yr on anniv. Thinking abt taking \$25K. Advised 5% of \$25K is \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If events made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified guaranteed CV rate. An statement shows accum divs at 3.6%. Was in the middle of explaining that accum divs do not equal or affect the CV so earns at a diff percentage (current/guaranteed) - phone cut out in middle of to call back on 8/1

MONS confirmed PO 1/28059088 - confirmed \$13,521.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per proposal not less than 3% and currently earn 3.6% loan interest 5% per current rates and non-guaranteed values

X TAJIKENASLEY, 40-1397, wanting to know the interest rate on the loan: adv 5% wanting to know what interest rate is on the accumulated dividends adv 3.6%

MONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anniv (5/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anniv (8/22/18), will be around 8/1, no divs currently

MONS PO verified LF-2805-9088 PO wanted the CSV 74728.95 TG-0 off 5/7/18 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the illustration - he is certain he saw something that said it could be as much as 6%. But he is not able to locate the paper. Found revised illustration in imaging 7/7/10. He wanted a copy of the revised illustration to be faxed to agt #243-737-7024 SR to SBL-WKKREQ-LRC-APD **TJAPD RE: PO is requesting a copy of the RL generated 07/07/2010 in ISET, but a regular PPR w/no changes should display the same information. Please mail to address. Faxing the illustration may not follow our guidelines. Will be mailed to address on file.

IGY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an /to try to sue the agent. Act also indicates that PI has been trying to get SS disability benefits since 2006. Sent Siebel email to CLAIMS

MONS verified as PO find out what is the values in my life insurance 1/28051344 \$159.05 accumulated dividends, 11,174.27 available as a loan 1/35977997 \$150 accumulated dividends; \$15,414.61 1/28059088 \$16,009.50 accumulated dividends; \$67,566.93 available as a loan; \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

CLEMENTS verified; 1/28059088; 15 PL; loan available as of 4/18/19 Maximum loan available: \$67,594.51. Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO inform of claimed by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO

MONS PO verified, LF-2805-9088 wanting to know what divs are avl for him to take but, I adv there are accounts of \$15,009.50. I adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent selection line. LF-2806-1344 wanting to know what funds are avl on the policy. I adv there are accounts of \$1,159.05 and a loan avl of \$11,347.12. I adv should request through agt

MONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed I advised PO that I would send request up to a TM to verify what was ng with req to change servicing agt as per trf note 02-25 any contact by PO needs to be sent to Compliance Rachael Gomez (OSHQ) sent Siebel e mail

CLEMENTS verified: lost the call when trying to get the number to Agent Assignment

IGY PINNELL, 40-1913, how AMD form was sent to Insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

EGGY PINNELL (40-1913) called for the special monthly premium with WPD. I advised approximately \$882.85.

ISTINA WYNHAM, 40-1913, 1/28059088 transferred to life compliance

883 A/S MELISSA OYANIS, 40-1913, calling to state agt is requesting copy of rl from 7/7/2010 be emailed to her, emailed to a/s

VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

NAME	STATUS	CONTACT	DATE	DETAILS
LUNDQVIST	Archived	LRC Workgroup	MEMB	LEIDA
BOYCE	Archived	LRC Workgroup	QABA	BOYCE
SMICHEZ	Archived	LRC Workgroup	SBA	CHRISTINE
FEIGHTNER	Archived	LF-RC-PHONE-ONLY	AGYE	FEIGHTNER
STEPHENS	Archived	LF-RC-PHONE-ONLY	FAQD	STEPHENS
BOXER	Archived	LF-RC-PHONE-ONLY	UCKR	SHAGNA
WEBB	Archived	SBL PHONE-LRC-TERS	AMNU	WEBB
TOOMEY	Archived	SBL PHONE-LRC-TERS	YBFG	TOOMEY
CAUST	Archived	SBL PHONE-LRC-TERS	YBFG	CAUST
BEHNER	Archived	SBL PHONE-LRC-TERS	CKOB	BEHNER
DECKARD	Archived	SBL PHONE-LRC-TERS	YBFG	DECKARD
AYCOCK	Archived	SBL PHONE-LRC-TERS	YBFG	AYCOCK
DANIELS	Archived	SBL PHONE-LRC-TERS	YBFG	DANIELS
RIBBEL	Archived	SBL PHONE-LRC-TERS	YBFG	RIBBEL
MOPECK	Archived	SBL PHONE-LRC-TERS	YBFG	MOPECK
STEVENS	Archived	SBL PHONE-LRC-TERS	YBFG	STEVENS
LINDSEY	Archived	SBL PHONE-LRC-TERS	YBFG	LINDSEY
VANGORDER	Archived	SBL PHONE-LRC-TERS	YBFG	VANGORDER
SABZEYARI	Archived	SBL PHONE-LRC-TERS	YBFG	SABZEYARI
BLESSENBAUGH	Archived	SBL PHONE-LRC-TERS	YBFG	BLESSENBAUGH
HARDING	Archived	SBL PHONE-LRC-TERS	YBFG	HARDING
BROWN	Archived	SBL PHONE-LRC-TERS	YBFG	BROWN
SABZEYARI	Archived	SBL PHONE-LRC-TERS	YBFG	SABZEYARI
HAYZUS	Closed	SBL PHONE-LRC-TERS	YBFG	HAYZUS
PARKER	Closed	SBL PHONE-LRC-TERS	YBFG	PARKER
HARRIS	Closed	SBL PHONE-LRC-TERS	YBFG	HARRIS
MORGAN	Closed	SBL PHONE-LRC-TERS	YBFG	MORGAN
HETTK	Closed	SBL PHONE-LRC-TERS	YBFG	HETTK
MOYER	Closed	SBL PHONE-LRC-TERS	YBFG	MOYER
RAVUSH	Closed	SBL PHONE-LRC-TERS	YBFG	RAVUSH
PERKINS	Closed	SBL PHONE-LRC-TERS	YBFG	PERKINS
FRANCO	Closed	SBL PHONE-LRC-TERS	YBFG	FRANCO
RAUBER	Closed	SBL PHONE-LRC-TERS	YBFG	RAUBER
SOWARD	Closed	SBL PHONE-LRC-TERS	YBFG	SOWARD

2805-9088 Policyowner/insured, Joe Clemons, called to the details of the policy he was under the understanding that after 15 years I have a paid up policy and would be able to take the cash value back out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan

2805-9088 10 year term Belinda Policyowner/insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding loan is deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.6%. Int rate is variable. Trans to Belinda, Values floor or assistance with annuitizing.

40-1913 Peggy 2805-9088 2573-9762 Agent, Peggy Pinell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol, can't add WPD rider to this 15 year life, could do a COP to a new 15 year life to add WPD, would be fully underwritten, and needed signed since RL not yet WPD but couldn't be issued by pol w/o app and und.

A/S CHRISTINA WYNDAHAM, 40-1913, 1134655386 wants to reinstate, 70.90, 4.25 A/S CHRISTINA WYNDAHAM, 40-1913 112805-9088, cash value

A/S CHRISTINA WYNDAHAM, 40-1913 called her to paid in advance tool thru abi for a new business app she wasn't 100% sure of the amount or coverage that was desired wanted current ill emailed to her at (143V)

Joe Clemons, Policyowner/insured verified by tel & regarding decreasing the DB and how that will affect the CV earning in the future. LF-2106-1344 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products. LF-2805-9088 Explained prod. Cannot reduce cov and pay same prem. Adv to contact Agt to run quotes for other products.

A/S Christina called 40-1913, advised that how the dividends work. Current option is to receive dividends on policy as cash and earn interest. They can be taken out at any time, or they are paid to her at the death of the insured in addition to the face amount. They are a separate number from the cash value, which is the value of the base policy.

P/O Joe Clemons verified request for force illustration to be mailed, verified address

P/O called in regarding why he did not get WPD. I advised on the original app (2573-9762) it was not applied for, but on Term Conversion (2805-9088) it was denied due to Rheumatoid Arthritis. Joe had specific questions, so I advised him to call his agent for further assistance.

A/S CHRISTINA WYNDAHAM, 40-1913, calling to inquire as to why the WPD was declined. RA. *This never happens a big life, and what is the debt the rate*

Agt L PEGGY PINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the P/O applied for WPD. Advised that previous rep that spoke to P/O advised that it was not on original app but when the P/O did a term conversion on this policy the request was to have WPD. There is a signed AMD on this policy that advised P/O/Pi was aware that they insured without WPD. Sent AO copy of RL submitted with WPD requested.

Joe Clemons, P/O verified, 112805-9088 clemonsjoelw@comcast.net Joe Clemons, P/O verified, LF-2805-9088 Asking if WPD-PD was on policy? Adv. no, adv. there is a signed AMD stating it issued with an WPD. Asking how much dividends approx. would PO have at 15 years of having policy \$35,081. Cash value after 15 years \$120,058. Based on what PO pays now and at the end of 15 years will have paid \$152,450. Joe Clemons, P/O verified, LF-2805-1344 Called to verify at the end of the 15 years what will be approx. cash value, \$18,036.00 and accum dividends \$20,520.00. Based on what PO pays now and at the end of 15 years will have paid \$31,321.60

Joe Clemons, P/O LF-2805-9088 received as a Sup. Exec. PO is wanting to know why WPD not on policy and was under impression that it was on the original policy and then got denied once TC was issued. Per notes looks like never was on original app and then put it on there on TC app and was denied. I explained would get in a 7/1 to review and see what we can do and follow up with him.

Joe Clemons, INS. Spoke w/ Patrick Daniels yesterday, he told P/O called him back and requested that he call in. Adv. can't assist with his policy since I am in the Health Response Center, I can get him to a supervisor but not Patrick directly, agt could get him to the LAC to assist. He disconnected the call.

A/S CHRISTINA WYNDAHAM, 40-1913 calling to see what a supervisor advised the notes that were left from the supervisor I also advised that it is subject to underwriting he may be approved and he may not be approved.

Agt PEGGY PINNELL, 40-1913 are we able to write a letter to the PI from our legal department to advise that the contents on the original term application LF-2573-9762 and TC app/advising policy LF-2805-9088 are legally binding documents and that we cannot make an exception to go back and add WPD, even if new policy LF-2597-7997 has the rider? The agent is being harassed and has been threatened with legal action, looking for guidance or a solution to effectively silence the insured if possible

Joe Clemons (P/O) called because this number was on his caller ID. Located policy numbers during alpha search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left him a vm with her direct number which I do not have access to. He was ending and didn't check his messages, just called the number that showed on his caller ID

Joe Clemons LF-2805-9088 FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 5.6% on his annual notice. 112805-1344 AUAS - SRIF for WPD claim. Wanting to speak w/ Public Affairs?

JOE CLEMONS - PO verified, LF-2805-9088 - Total accumulated = \$13,571.53, loan avail = \$49,348.32, no TG. Variable 5% interest rate. Interest accrues daily, but billed once a year on anniv. Thinking abt taking \$25K. Adv'd 6% of \$25K is approx. \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If payments made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified loan 4% guaranteed CV rate. AM statement shows accum divs at 3.6%. Was in the middle of explaining that accum divs do not equal or offset the CV so came at a diff percentage (correct/guaranteed) - phone cut out in middle of convo. He call back please.

JOE CLEMONS - confirmed PO - 112805-9088 - confirmed \$13,571.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per rep proposal not less than 3% and currently earn 3.6% loan interest 5% variable per current rates and non-guaranteed values

AGT JACK TANKERSLEY, 40-1397, wanting to know the interest rate on the loan, 5.6% wanting to know what interest rate is on the accumulated dividends adv 3.6%

JOE CLEMONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to anniv (6/7/16), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to anniv (8/21/16), will be sent out around 8/1, no divs currently

JOE CLEMONS PO verified LF-2805-9088 PO wanted the CV 7471.95 76-0 all 5/7/16 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for acc divs is not less than 3% per the revised illustration - he is certain he saw something that said it could be as much as 6%. But he is not able to locate the paper. Found revised illustration in Imaging 7/7/16. He wanted a copy of the revised illustration to be faxed to him at fax 814-753-7024 SR to SBC-WINREQ-LAC-APP. *TZAPD RE: PO is requesting a copy of the XSI generated 07/07/2010 in ISBT, but a regular PPR w/ no changes should display the same information. Please mail to address on file as faxing the illustration may not follow our guidelines. Will be mailed to address on file.

Agt. PEGGY PINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an attorney to try to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2006. Sent Siebel email to CLAIMS

JOE CLEMONS verified as PO find out what is the values in my life insurance. 1128061344 \$159.05 accumulated dividends; 11,174.27 available as a loan 11597797 31.50 accumulated dividends; \$15,414.61 112805-9088 \$16,009.50 accumulated dividends; \$67,556.93 available as a loan. \$4061.45 Once terminated it can not be reinstated and there is no taxable gain.

PO JOE CLEMONS; verified; 112805-9088; 15 PL; loan available as of 4/18/19 Maximum loan available: \$67,594.51. Taxable gain: \$0.00. Annual loan interest will be charged. PO informs relationship with AO is not well; PO informs of being chastised by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expediting money; advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO

JOE CLEMONS; PO, verified, LF-2805-9088 wanting to know what divs are avl for him to take out. I adv there are accums of \$16,009.50. I adv should request the funds through the agt office. Wants his policy to be transferred to a different agency. Transferred him to the agent selection line. LF-2806-1344 wanting to know what funds are avl on the policy. I adv there are accums of \$1,159.05 and a loan avl of \$11,247.71. I adv should request through agt office.

JOE CLEMONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed I advised PO that I would send request up to a TM to verify what was happening with req to change servicing agt as per trio note 02-28 any contact by PO needs to be sent to Compliance Rachael Gomez (OSHC) sent Siebel email

PO JOE CLEMONS verified. Lost the call when trying to get the number to Agent Assignment

Agt. PEGGY PINNELL, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

Agent PEGGY PINNELL (40-1913) called for the special monthly premium with WPD. I advised approximately \$682.85

A/S CHRISTINA WYNDAHAM, 40-1913 112805-9088 transferred to life compliance

112805-9088 A/S MELISSA OWENS, 40-1913, calling to state agt is requesting copy of rbl from 7/2010 be emailed to her. emailed to e/s

Joe, PO VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

What was in that place.

1038 Policyowner/Insured, Joe Clemons, called to find out the details of the policy he was under the understanding that after 15 years he would have a paid up policy and would be able to take the cash out and not have a loan but still have a paid up policy advised the cash value would have to be taken as a loan.

18 10 yr certain Belinda Policyowner/Insured, Joe, called to ask questions regarding policy loans, advised based off guaranteed cv, discussed guaranteed and non-guaranteed values. Any outstanding deducted from death benefit. Advised loan int billed annually. He is not required to pay loan back but we do suggest loan int is paid to keep policy from lapsing. Current int rate is 5.6%, int rate is variable. Trans to Belinda, loan or assistance with annuitizing.

Peggy 2805-9088 2573-9762 Agent, Peggy Pinnell (40-1913), called about WPD not on policy, when pol converted from 2573-9762 was not a rider on orig pol, can't add WPD rider to this 15 pay life, could do a COP to a pay life to add WPD, would be fully underwritten, and needed signed since RL noted yes WPD but couldn't be issued on pol w/o add and und.

ISTINA WYNNDHAM, 40-1913, 1734665336 wants to reinstate, 70.50, 4/25 A/S CHRISTINA WYNNDHAM, 40-1913 172805-9088, cash value

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ISTINA WYNNDHAM, 40-1913, calling in regards to seeing why the app was declined. RA: *the date this app happened a long time ago and what is the date.* GYPINNELL, 40-1913, LF-2805-9088 called to get copy of app that showed where the PO/PI applied for WPD. Advised that previous rep that spoke to PO/PI advised that it was not on original app but when the PO/PI did a version on this policy the request was to have WPD. There is a signed AMD on this policy that advised PO/PI was aware that they issued without WPD. Sent AO copy of RL submitted with WPD requested.

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ISTINA WYNNDHAM, 40-1913, calling to see what a supervisor advised the notes that were left from the supervisor. Also advised that it is subject to underwriting he may be approved and he may not be approved.

GYPINNELL, 40-1913, was unable to bring to write a letter to the PI from our legal department to advise that the contract on the original term application LF-2573-9762 and TC app existing policy LF-2805-9088 are legally documents and that we cannot make an exception to go back and add WPD, even if new policy LF-3597-7997 has the rider. The agent is being harassed and has been threatened with legal action, looking for guidance of a legal office to advise the insured if possible.

ions (PO) called because the number which his caller ID located policy number during who search. There is WPD on LF-3597-7997, but not on LF-2805-9088. The notes under LF-2805-9088 indicate a rep called and left with hard direct number which I do not have access to. He was drinking and didn't check his meter, just called the number that showed on his caller ID.

mons LF-2805-9088 FULLY VERIFIED PO - Calling to determine on the policy what the interest rate on the dividends is, adv currently showing 3.6% on his annual notice. 1728061344 ALIAS - SRIF for WPD claim. Wanting to Public Affairs.

MONS PO verified LF-2805-9088 - total accum divs = \$19,524.53 loan avail = \$49,348.12, no TG, variable 5% interest rate. Interest accrues daily, but billed once a year. Currently thinking abt taking \$25K. Advised 5% of \$25K is \$1,250 that would be billed in interest. This does not assume loan repayments are being made. If pymts made, loan interest billed decreases. Confirmed does not have to be all loan, can split between divs & loan. Verified guaranteed CV rate. AN statement shows accumulation at 3.6% was in the middle of explaining that accum divs do not equal or differ at the CV so same at a diff percentage (current/guaranteed) - phone cut out in middle of to call back phone.

MONS confirmed PO 172805-9088 confirmed \$19,511.53 accumulated dividends which earn 3.6% interest. Interest on accumulated dividends per proposal not less than 3% and currently earn 3.6% loan interest 5% on current rates and non-guaranteed values.

KTALEXSLEY, 40-1397, wanting to know the interest rate on the loan, adv 5% wanting to know what interest rate is on the accumulated dividends, adv 3.6%.

MONS PO (VER) called on 2 policies LF-2805-9088 adv annual notice sent out 21 days prior to ann (8/7/18), will be mailed out around 5/16 LF-3597-7997 adv annual notice sent out 21 days prior to ann (8/22/18), will be around 6/1, no divs currently.

MONS PO verified LF-2805-9088 PO wanted the CSV 74728.95 7640.81 5/7/18 If surrendered it cannot be reinstated. PO asked about interest rates. Advised the policy interest rate for loan divs is not less than 3% per the illustration - he is certain he saw something that said it could be as much as 6%, but he is not able to locate the paper. Found revised illustration in Imaging 7/7/10. He wanted a copy of the revised illustration to be faxed to ex 8243-753-7014 - SR to SBCA WYKREO-LRC-APD. **TAPD RE: PO is requesting a copy of the RL generated 07/07/2010 in LSCIT, but a regular PPA w/ no changes should display the same information. Please mail to address. Faxing the illustration may not follow our guidelines. Will be mailed to address on file.

GYPINNELL, 40-1913, Please place a note on policy that PI is to be dealing w/ Life Co directly and not going through agent. Agt indicates that PI has been threatening to her, her family, staff, belongings, and obtained an r to try to sue the agent. Agt also indicates that PI has been trying to get SS Disability benefits since 2005. Sent Siebel email to CLAIMS.

MONS verified as PO find out what is the values in my life insurance. 1728061344 \$159.05 accumulated dividends, 11174.27 available as a loan. 1735977997 31.50 accumulated dividends, \$15,414.61 1728059088 \$16,009.50 accumulated dividends, \$67,566.93 available as a loan. 84081.45 Once terminated it can not be reinstated and there is no taxable gain.

CLEMONS verified, 1728059088, 15 PL loan available as of 4/18/19 Maximum loan available: \$67,591.51 Taxable gain: \$0.00. Annual loan interest will be charged, PO informs relationship with AO is not well. PO inform of satisfied by agent. Review annual interest rate of 5%, along with establishing loan billable. PO inform of expending money, advise PO to submit RL part A and F for ACH direct deposit. PO will follow up with AO.

MONS PO verified, LF-2805-9088 wanting to know what divs are adv for him to take but I adv there are accum of \$16,009.50, I adv should request the funds through the agt office. Wants his policy to be transferred to a agency. Transferred him to the agent's selection line. LF-2806-1344 wanting to know what funds are adv on the policy, I adv there are accum of \$1,159.05 and a loan adv of \$11,347.21. I adv should request through agt.

MONS PO fully verified has been trying for several weeks to transfer policies to new agt, this has not been done so was wondering when it will be completed. I advised PO that I would send request up to a TM to verify what was ing with req to change servicing agt as per telr note 02-28 any contact by PO needs to be sent to Compliance Rachael Gomez (DSHQ) sent Siebel a mail.

CLEMONS verified: Lost the call which trying to get the number to Agent Assignment.

GYPINNELL, 40-1913, how AMD form was sent to insure. Reach out to Help desk and Sara is going to call her. Agent is okay with getting a call back.

GYPINNELL (40-1913) called for the special monthly premium with WPD, I advised approximately \$882.65.

ISTINA WYNNDHAM, 40-1913, 1728059088 transferred to life compliance.

088 A/S MELISSA OVAJIS, 40-1913, calling to state agt is requesting copy of RL from 7/2010 be emailed to her, emailed to a/s.

VERIFIED, inquired when he will receive annual notice. Adv'd notice will be generated mid-May. Inquired about guaranteed rate. Adv'd acc div guaranteed is 3%. Adv'd interest on acc div being earned is currently 3.35%.

Common Pleas

Clerk : Leah Guerry Dupree

300 B California Avenue

Moncks Corner, SC 29461

Phone:(843) 719-4400 Fax:(843) 719-4509

Received From: Clemons, Joe
2202 Adiddas St.
Eutawville, SC 29048

Date: 8/31/2022
Receipt #: 6113515
Clerk: c08slovin

Paying for: Self
Transaction Type: Payment

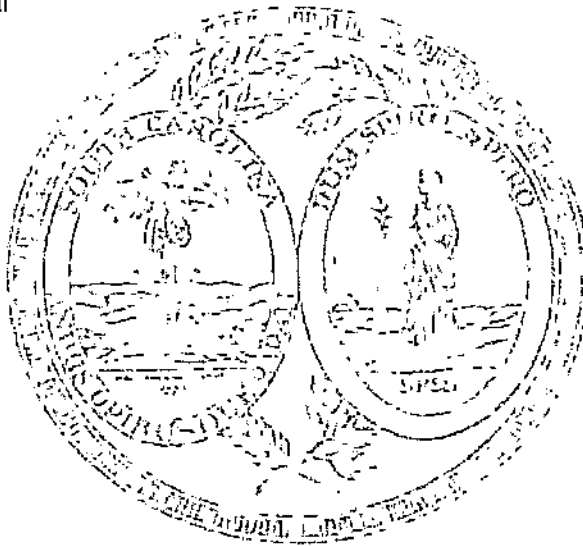
Payment Type: Cash \$25.00
Total Paid: \$25.00

Reference #:
Comment:
Non-Refundable

You may check the status of your Berkeley case at:

<http://www.sccourts.org/caseSearch/>

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2021CP0802709	Joe Clemons VS Home Telecom Company , defendant, et al	\$25.00	\$25.00	\$0.00



Total Cases:	1	\$25.00	\$25.00	\$0.00
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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	NINTH JUDICIAL CIRCUIT
COUNTY OF BERKELEY	)	
	)	
Joe Clemons,	)	CASE NO.: 2022-CP-0802427
Plaintiff,	)	
	)	
vs.	)	ORDER DENYING PLAINTIFF’S MOTION
	)	FOR RECONSIDERATION PURSUANT TO
William S. Helmly/President & CEO of	)	RULE 59(e), SCRPC
Home Telecom Co.,	)	
	)	
Defendants.	)	
	)	
	)	

This matter is before the Court upon Defendants’ Limited Motion for Reconsideration Pursuant to Rule 59(e), SCRPC (“the Motion”), which was timely filed on February 16th, 2023. The Motion asks this Court to alter, amend, or reconsider its Order Granting Defendant’s Motion to Dismiss, entered February 6th, 2023. On March 3rd, 2023, Defendant’s Response to Plaintiff’s Motion for Reconsideration was filed.

After reviewing the applicable law and considering the arguments raised in the Motion and Defendant’s Response, the Court is unable to discover any material fact or principle of law that has either been overlooked or disregarded and further finds no error of law or fact not appropriately considered.

Accordingly, the Court concludes that altering, amending, or reconsidering its prior Order is unwarranted, and the issues raised in the Motion do not change the Court’s reasoning or conclusions. As such, Plaintiff’s Motion for Reconsideration is hereby **DENIED**, and the Court, pursuant to the discretion afforded by Rule 59 and *Pollard v. County of Florence*, concludes that a hearing is not necessary to rule on Plaintiff’s Motion for Reconsideration. See Rule 59(f), SCRPC (stating a Rule 59(e) motion “may in the discretion of the court be determined on the briefs filed by the parties without oral argument”); see also *Pollard*, 314 S.C. 397, 401–02, 444 S.E.2d 534, 536 (Ct.

App. 1994) (holding there was “no merit in Pollard's assertion that the circuit court committed reversible error in denying her motion to alter or amend the judgment under Rule 59(e) SCRCP, without first conducting a hearing or allowing [the parties] ‘to fully brief’ the issues raised in [the] motion”).

AND IT IS SO ORDERED.

[JUDICIAL E-SIGNATURE PAGE TO FOLLOW]



Berkeley Common Pleas

Case Caption: Joe Clemons VS William S Helmly/President & CEO of Home
Telecom Co.
Case Number: 2022CP0802427
Type: Order/Other

So Ordered

s/ Daniel Coble, 2774

STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

Joe Clemons,

Plaintiff,

vs.

Home Telecom Company, and William S
 Helmly, President & CEO,

Defendant.

IN THE COURT OF COMMON PLEAS
 FOR THE NINTHTH JUDICIAL CIRCUIT

CASE NO: 2021-CP-08-02709

**ORDER DENYING MOTION FOR
 RECONSIDERATION PURSUANT TO
 RULE 59(e)**

The Plaintiff filed a motion asking this Court to reconsider its Order dated August 8, 2022 granting Defendants’ Motions to Dismiss. Plaintiff’s motion filed on August 31, 2022 asks this Court to reconsider the Order and allow Plaintiff to pursue its claims against the Defendants. For the reasons set forth below, the motion to reconsider is DENIED.

STANDARD OF REVIEW

“Rule 59(e) of the South Carolina Rules of Civil Procedure provides, ‘A motion to alter or amend the judgment shall be served not later than 10 days after receipt of written notice of the entry of the order.’” *Gobbi v. People’s Fed. Bank*, No. 2006-UP-245, 2006 S.C. App. Unpub. LEXIS 231, at *11 (Ct. App. May 16, 2006) (quoting Rule 59(e), SCRCPP). Motions for reconsideration will not be granted absent “highly unusual circumstances.” *U.S. ex rel. Becker v. Washington Savannah River Co.*, 305 F.3d 284, 290 (4th Cir. 2002) (stating that simple disagreements with the court’s ruling will not support Rule 59(e) relief).¹ Courts have recognized three circumstances in which a court should grant a Rule 59(e) motion: (1) to accommodate an

¹ Rule 59 is substantially the same as the Federal Rule. *See Elam v. S.C. Dep’t of Transp.*, 361 S.C. 9, 21, 602 S.E. 2d 772, 779 (2004) (“Rule 59(e) in the South Carolina and federal rules of civil procedure is practically identical.”).

intervening change in controlling law; (2) to account for new evidence not available at trial; or (3) to correct a clear error of law or prevent manifest injustice.” Hutchinson v. Staton, 994 F.2d 1076, 1081 (4th Cir. 1993). Importantly, a motion for reconsideration is not a vehicle to re-litigate previously raised issues or “to raise argument or present evidence that could have been presented prior to the entry of judgment.” Dash v. Mayweather, C/A No. 3:10-1036-JFA, 2010 U.S. Dist. LEXIS 95277, *2 (D.S.C. Sept. 13, 2010) (quoting Exxon Shipping Co. v. Baker, 554 U.S. 471, n.5 (2008)). In other words, “[a] party cannot use Rule 59(e) to present to the court an issue the party could have raised prior to judgment but did not.” Stevens & Wilkinson of S.C., Inc. v. City of Columbia, 409 S.C. 563, 567, 762 S.E.2d 693, 695 (2014); Patterson v. Reid, 318 S.C. 183, 185, 456 S.E.2d 436, 437 (Ct. App. 1995). Nor does “[a] party’s mere disagreement with the court’s ruling . . . warrant a Rule 59(e) motion.” In re Pella Corp. Architect & Designer Series Windows Mktg., Sales Practices & Prods. Liab. Litig., 269 F.Supp. 3d 685, 691 (D.S.C. 2017); *see also* Lyons v. Fid. Nat’l Title Ins. Co., 415 S.C. 115, 135, 781 S.E.2d 126, 137 (Ct. App. 2015).

After consideration of the issues raised in the parties’ memorandums, Plaintiff’s Motion to Reconsider pursuant to Rule 59(e) is DENIED.

AND IT IS SO ORDERED.

ELECTRONIC SIGNATURE PAGE TO FOLLOW



Berkeley Common Pleas

Case Caption: Joe Clemons VS Home Telecom Company , defendant, et al

Case Number: 2021CP0802709

Type: Order/Relief

It is so ordered.

/s Roger M. Young, Sr. S.C. Circuit Judge 2134

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	NINTH JUDICIAL CIRCUIT
COUNTY OF BERKELEY	)	
	)	
Joe Clemons,	)	CASE NO.: 2022-CP-0802427
Plaintiff,	)	
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William S. Helmly/President & CEO of	)	RULE 59(e), SCRPC
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App. 1994) (holding there was “no merit in Pollard's assertion that the circuit court committed reversible error in denying her motion to alter or amend the judgment under Rule 59(e) SCRCP, without first conducting a hearing or allowing [the parties] ‘to fully brief’ the issues raised in [the] motion”).

AND IT IS SO ORDERED.

[JUDICIAL E-SIGNATURE PAGE TO FOLLOW]



Berkeley Common Pleas

Case Caption: Joe Clemons VS William S Helmly/President & CEO of Home Telecom Co.
Case Number: 2022CP0802427
Type: Order/Other

So Ordered

s/ Daniel Coble, 2774