

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, Circuit Court Judge

Case No. 2011-CP-01051

Margaret H. Fitch M.D.

Respondent

v.

Michael G. Morgan

Appellant

ANSWER IN OPPOSITION TO MOTION FOR COSTS

Appellant, who is acting Pro Se, respectfully requests that Counsel's motion for costs be denied because the motion was filed after the required deadline.

Respondent prevailed in the Aiken County Court of Common Pleas not on the merits of the case but because Appellant inadvertently missed the filing deadline to answer Respondent's Requests for Admission. Appellant submitted a motion for an enlargement of time in order to once again dispute Respondent's claims but it was denied by the Court, which granted Respondent's motion for summary judgment because all of the requests for admission were deemed admitted

Having successfully argued that deadlines matter in the Court of Common Pleas,

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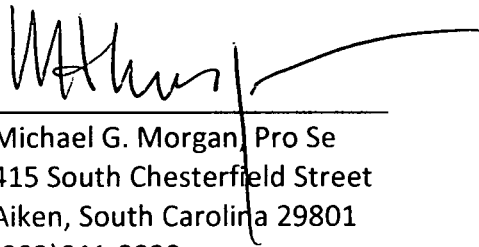
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SC Court of Appeals

Respondent is now appearing to argue that deadlines should not matter in The Court of Appeals. Under these circumstances, it seems to Appellant that If Chutzpah were a legal term, it would certainly apply to Counsel's pending motion.

Because Respondent's Counsel missed the deadline, this motion should be denied.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "M. Morgan", is written over a horizontal line. A long, sweeping horizontal stroke extends from the end of the signature to the right.

Michael G. Morgan, Pro Se
415 South Chesterfield Street
Aiken, South Carolina 29801
(803)641-8823

PROOF OF SERVICE

This will certify that on August 2, 2013, a copy of the foregoing was sent by regular mail, postage prepaid, to the following counsel of record:

John S. Nichols
Bluestein Nichols Thompson & Delgado, LLC
1614 Taylor Street
Columbia, South Carolina 29202

Mary O. Guynn
P. O. Box 519
Aiken, South Carolina 29802