

Aug 20 2024

SC Court of Appeals

From: R. Al Joy
To: Court Of Appeals Filings
Cc: Emily O'Brian
Subject: RE: Beverly Taylor v. R. Allan Joy (2023-001889)
Date: Tuesday, August 20, 2024 11:12:32 PM

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RE: 2023-001889
20 August 2024

Gentlepersons:

What Counsel says about her re-submission of
"Initial Brief of Respondents" (BOR):

"... No changes have been made
to the substance of the brief."

is \_not\_ true. In a first filing on 08/07/24, BOR showed
a blank "Page ii", without pages "iii" and "iv". In
her re-submitted filing on 08/19/24 - which was \_late\_
by 12 days - BOR has filled in content on "Page ii", and
added content via new pages "iii" and "iv". First-filing-
numbered pages span pages 1 - 9. Re-submitted-filing-numbered
pages span pages 1-10 - admitting with "Respectfully re-
submitted ..." - on Page 10.

Due to lack of financial resources available to file a
motion, Appellant is \_not\_ able to submit a motion. Because
of the \_late\_ filing of the "real" BOR (re-submitted),
Appellant believes it is appropriate for the Court of Appeals
to grant "default judgment" in favor of Appellant.

Thank you.

R. AlJoy 864-356-5736

Cheers . . . . . ra14joy102@proton.me
Support "wilderness" - conserve nature !
Be American - buy "Made in USA" !!
GO ORANGE - Syracuse University ORANGE !!
There is no greater disaster than greed !!
Never let failure get to your heart !!
Stop organized crime. Re-elect no one !

... And we lead not by the example of our power,
but by the power of our example. - Joe Biden

----- Excerpted Message -----

On Tuesday, August 20th, 2024 at 8:23 AM, Court Of Appeals Filings <ctappfilings@sccourts.org> wrote:

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**From:** Emily O'Brian <emily@campbellteague.com>  
**Sent:** Monday, August 19, 2024 4:23 PM  
**To:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Kim Lykes <kim@campbellteague.com>; R. Al Joy <ra14joy102@proton.me>  
**Subject:** RE: Beverly Taylor v. R. Allan Joy (2023-001889)

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Attached please find for filing an updated copy of Respondents' Initial Brief, addressing deficiencies noted in August 9th correspondence from this Court as well as adjusting formatting. No changes have been made to the substance of the brief.

Best,  
Emily

**Campbell Teague LLC**

Emily O'Brian, Esq.