

THE SOUTH CAROLINA COURT OF APPEALS

JENNY ABBOTT KITCHENS
CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
Tel. (803) 734-1890 Fax. (803)734-1839

September 23, 2024

ANTHONY R. TAYLOR,
1549 LILLY AVENUE
COLUMBIA, SOUTH CAROLINA 29204
(803) 463-7725

RECEIVED
SEP 24 2024
SC Court of Appeals

MR. WILLIAM MICHAEL HEMLEPP, JR., ESQUIRE
P. O. BOX 667
CITY OF COLUMBIA (LEAGAL DEEPT.)

Re: Anthony R. Taylor v. The State of South Carolina Office of Attorney General

Appellate Case No. 2024-000922

Dear Clerk Harrison:

Please find enclosed an original copy of the Affidavit of Service by way of the Richland County Sheriff's Department of Summons & Complaints. The Notice Officer of the company, Stephanie Kennedy, left a copy on May 15, 2023, at 3:46 PM. These legal documents of Record are the process of the rule of court for legal and proper service. Appellant obeyed the demand of the court to give notice to counsel of record, which was William Micheal Hemlepp Jr., Esquire's, Attorney Alan Wilson's and Judge Addy's failure to reply and chose to leave the battlefield as they passed the ball over to Attorney Jacqueline M. Pavlicek, who then consolidated all prior cases as the acting counsel of record on appeal.

This mistake made is of no fault of Appellant, he obeyed the court rule thirty (30) days filing in a timely manner. See footnote of Jacqueline M. Pavlicek motion to dismiss 2021-CP-40-05864; see Taylor v. State 2019-CP-40,00486 (filed January 25, 2019), Taylor v. State 2019-CP-40-02482 (filed May 26, 2020).

Counsel Montgomery Willard LLC has also left the battlefield. These are procedural process tactics of deception and cover-up for mistake of counsel for the defendant at the expense and harm of appellant.

Sincerely,

Anthony R. Taylor, without prejudice 1-308

Anthony R. Taylor
1549 Lilly Avenue
Columbia, South Carolina 29204

Cc file: September 2024

South Carolina Court Administrative

South Carolina of Appeals

Mongomery Willard, LLC

Michael H. Montgomery

SC Bar No. 4034

1002 Calhoun Street

Post Office Box 11886

Columbia, South Carolina 2911-1886

(803) 779-3500

William Mike Hemlepp Jr., Esq.

Bar No. (64264)

Senior Assistant City Attorney

Litigation Office of the City Attorney

City of Columbia, South Carolina 29202

Tel. (803)737-4535/Fax (803) 737-4250

Attorney for Jacqueline Marie Pavlicek



Richland County Sheriff's Department

LEON L. LOTT, JR.
Sheriff

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, SC 29204

May 24, 2023

Re: Jacqueline M. Pavlicek

Dear Sir/Madam:

On 5/9/2023, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

A handwritten signature in black ink, appearing to read "Leon Lott". The signature is fluid and cursive, with a large initial "L" and "O".

Leon Lott
Richland County Sheriff

MAY 10 2023



Richland County Sheriff's Department

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 05/09/2023
File Number: C202303408
DSS Number: 0
Foreign Case #: 2023CP4002377

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

Date _____

Plaintiff Anthony Robert Taylor 1549 Lilly Avenue Columbia, SC 29204
Phone: (803)463-7725 Work:

Defendant(s) Jacqueline M. Pavlicek Office of City Attorney 1401 Main St. Columbia, SC 29201

PERSONALLY APPEARED Before Me P. Wilkes, duty sworn says that he/she served, or attempt to serve, the following civil paper(s):

Summons & Complaint 1
Motion 1
Notice 1

on the defendant, Jacqueline M. Pavlicek - office of city Attorney, as follows:

() By personally handing the process to the defendant at _____, SC on _____

() By handing the process to _____ at _____, SC on _____, a person of suitable age and discretion then residing in the defendant's usual place of abode.

() By handing the process to Kenya Bingham (Adminstr) the registered corporate agent or officer of the company at 1401 MAIN ST, Columbia, SC on 05/18/23 - 9:26 AM and leaving him/her a copy.

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS: _____

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

18 day of May 2023
Kenneth Coleman

P. Wilkes
Deputy Sheriff, Richland County

P. WILKES
S# 1195

NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES
P.O. Box 143 Columbia, SC 29201

KENNETH COLEMAN
Notary Public, South Carolina
My Commission Expires
July 15, 2024

**RICHLAND COUNTY SHERIFF'S DEPARTMENT
CIVIL PROCESS DIVISION
SERVICE REQUEST INFORMATION SHEET**

You are requested to provide; to the best of your ability as much information as possible. It is understood that all information may not be available to you. However, the more information you provide will assist us in the service of your papers. If the address you provide is an apartment complex please include the building and apartment number and if it's a gated community the (Gate code).

The Richland County Sheriff's Department can't provide any legal advice and does not do any research in locating the person you are trying to serve. If you have more than one address you wish us to attempt a service fee will be required for each address requested. We will make 4-5 attempts to serve your paper but if no contact is made we will return paper non-served.

Once your paper is logged in it will be assigned to a Deputy Sheriff who will attempt to complete service. Within 10 days (excluding weekends and holidays). It may take longer depending on the current volume of papers and any special instructions you have listed.

INFORMATION ON PERSON TO BE SERVED

NAME Jaqueline Marie Palfick, Esq. / Office of City Attorney

ADDRESS 1401 Main Street

CITY, STATE/ZIP Columbia South Carolina 29201

NICKNAME/ALIAS _____ SEX _____ RACE _____ HEIGHT _____ WEIGHT _____ EYE _____ HAIR _____

VEHICLE INFO. _____

Suggested time to serve papers _____

PHONE NUMBER (_____) _____

Comments/Additional Information _____

**RETURN INFORMATION - REQUIRED
(This is who the Proof of Service will be returned to)**

NAME Anthony Robert Taylor

ADDRESS 1549 Lilly Avenue

CITY, STATE/ZIP Columbia, South Carolina 29204

PHONE NUMBER 803 1463 7725



Richland County Sheriff's Department

LEON L. LOTT, JR.
Sheriff

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, SC 29204

May 16, 2023

Re: Frank Addy, Jr.

Dear Sir/Madam:

On 5/9/2023, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

Leon Lott
Richland County Sheriff



Richland County Sheriff's Department

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 05/09/2023
File Number: C202303410
DSS Number: 0
Foreign Case #: 2023CP4002377

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

Date _____

Plaintiff Anthony Robert Taylor 1549 Lilly Avenue Columbia, SC 29204
Phone: (803)463-7725 Work:

Defendant(s) Frank Addy, Jr. c/o Attorney General Office 1000 Assembly St. Columbia, SC 29201

PERSONALLY APPEARED Before Me P. Wilkes, duty sworn says that he/she served, or attempts to serve, the following civil paper(s):

Summons & Complaint 1
Motion 1
Notice 1

on the defendant. FRANK Addy, Jr. c/o Atty. Gen. office as follows:

() By personally handing the process to the defendant at _____, SC on _____ (Date/Time)

() By handing the process to _____ at _____ (Name of Person Served/Relationship) (Street) _____, SC on _____ (Date/Time), a person of suitable age and discretion then residing in the defendant's usual place of abode.

(X) By handing the process to Stephanie Kennedy - Adm. Asst. the registered corporate agent or officer of the company at 1000 Assembly St. Columbia, SC on 05/15/23-3:46 PM and leaving him/her a copy.

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS: _____

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

15 day of MAY, 2023

P. Wilkes Deputy Sheriff, Richland County

P. WILKES S# 1195

NOTARY PUBLIC FOR SOUTH CAROLINA MY COMMISSION EXPIRES _____ P.O. Box 143 Columbia, SC 29202

Matthew S. Aul Notary Public, State of South Carolina My Commission Expires July 11, 2032

**RICHLAND COUNTY SHERIFF'S DEPARTMENT
CIVIL PROCESS DIVISION
SERVICE REQUEST INFORMATION SHEET**

You are requested to provide, to the best of your ability as much information as possible. It is understood that all information may not be available to you. However, the more information you provide will assist us in the service of your papers. If the address you provide is an apartment complex please include the building and apartment number and if it's a gated community the (Gate code).

The Richland County Sheriff's Department can't provide any legal advice and does not do any research in locating the person you are trying to serve. If you have more than one address you wish us to attempt a service fee will be required for each address requested. We will make 4-5 attempts to serve your paper but if no contact is made we will return paper non-served.

Once your paper is logged in it will be assigned to a Deputy Sheriff who will attempt to complete service. Within 10 days (excluding weekends and holidays). It may take longer depending on the current volume of papers and any special instructions you have listed.

INFORMATION ON PERSON TO BE SERVED

NAME Honorable Frank Addy, Jr. 2159 Circuit St. 528 Monument Street Suite 210 Greenwood, SC 29646
ADDRESS Post Office Box 11549 / 1000 Assembly Street, Col. 29201
CITY, STATE/ZIP Col. SC. 29211

NICKNAME/ALIAS _____ SEX _____ RACE _____ HEIGHT _____ WEIGHT _____ EYE _____ HAIR _____

VEHICLE INFO. _____

Suggested time to serve papers _____

PHONE NUMBER (_____) _____

Comments/Additional Information _____

**RETURN INFORMATION - REQUIRED
(This is who the Proof of Service will be returned to)**

NAME Anthony Robert Taylor
ADDRESS 1549 Lilly Avenue
CITY, STATE/ZIP Col. SC. 29204
PHONE NUMBER 803 3463 7725



LEON L. LOTT, JR.
Sheriff

Richland County Sheriff's Department

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, SC 29204

May 16, 2023

Re: Alan Wilson

Dear Sir/Madam:

On 5/9/2023, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

A handwritten signature in black ink, appearing to read "Leon Lott". The signature is fluid and cursive, with a large initial "L" and "O".

Leon Lott
Richland County Sheriff



Richland County Sheriff's Department

MAY 10 2023

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 05/09/2023
File Number: C202303409
DSS Number: 0
Foreign Case #: 2023CP4002377

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Date

Plaintiff Anthony Robert Taylor 1549 Lilly Avenue Columbia, SC 29204
Phone: (803)463-7725 Work:

Defendant(s) Alan Wilson SC Attorney General Office 1000 Assembly St. Columbia, SC 29201

PERSONALLY APPEARED Before Me P. Wilkes, duty sworn says that he/she served, or attempts to serve, the following civil paper(s):

Summons & Complaint 1
Motion 1
Notice 1

on the defendant. ALAN Wilson - SC Atty. Gen. office as follows:

() By personally handing the process to the defendant at (Street), (City), SC on (Date/Time).

() By handing the process to (Name of Person Served/Relationship) at (Street), (City), SC on (Date/Time), a person of suitable age and discretion then residing in the defendant's usual place of abode.

() By handing the process to Stephanie Kennedy Adm. Assst. the registered corporate agent or officer of the company at 1000 Assembly St. Columbia, SC on 05/15/23- 3:46 PM and leaving him/her a copy.

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS:

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

15 day of MAY, 2023

P. Wilkes Deputy Sheriff, Richland County

P. WILKES S# 1195

NOTARY PUBLIC FOR SOUTH CAROLINA MY COMMISSION EXPIRES P.O. Box 143 Columbia, SC 29202

Matthew S. Aul Notary Public, State of South Carolina My Commission Expires July 11, 2032

**RICHLAND COUNTY SHERIFF'S DEPARTMENT
CIVIL PROCESS DIVISION
SERVICE REQUEST INFORMATION SHEET**

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The Richland County Sheriff's Department can't provide any legal advice and does not do any research in locating the person you are trying to serve. If you have more than one address you wish us to attempt a service fee will be required for each address requested. We will make 4-5 attempts to serve your paper but if no contact is made we will return paper non-served.

Once your paper is logged in it will be assigned to a Deputy Sheriff who will attempt to complete service. Within 10 days (excluding weekends and holidays). It may take longer depending on the current volume of papers and any special instructions you have listed.

INFORMATION ON PERSON TO BE SERVED

NAME Alan Wilson Attorney General

ADDRESS 1000 Assembly Street

CITY, STATE/ZIP Columbia South Carolina

NICKNAME/ALIAS _____ SEX _____ RACE _____ HEIGHT _____ WEIGHT _____ EYE _____ HAIR _____

VEHICLE INFO. _____

Suggested time to serve papers _____

PHONE NUMBER (_____) _____

Comments/Additional Information _____

**RETURN INFORMATION - REQUIRED
(This is who the Proof of Service will be returned to)**

NAME Anthony Robert Taylor

ADDRESS 1549 Lilly Avenue

CITY, STATE/ZIP Columbia South Carolina 29204

PHONE NUMBER (803) 463-7725