

STATE OF SOUTH CAROLINA

In The Court of Appeals

Appeal from Greenville County  
Court of Common Pleas  
Judge R. Lawton McIntosh, Circuit Court

Appellate No. 2009-141246  
Civil Action No. 2008-CP-23-5245

RECEIVED  
SEP 02 2013  
SC Court of Appeals

Blue Ridge Electrical Cooperative, Inc. Appellants/Respondents,

Versus

Kathleen J. Gresham  
And Steve Gresham, Respondents/Appellants.

MOTION TO INCREASE BRIEF PAGES AS SUBMITTED AND FOR FINAL BRIEF AS ATTACHMENT OF TRANSCRIPTION DOCUMENTS ARE ESSENTIAL TO ESTABLISH TO BRIEFS' EXISTENCE REFUTED BY APPELLANTS AND AS APPELLANTS HAVE WRONGFULLY STATED TRIAL TRANSCRIPT DOES NOT EXIST;

AND

MOTION TO SANCTION APPELLANTS/RESPONDENTS FOR FILING A FRIVOLOUS MOTION TARGETING PRO SE RESPONDENTS, TRYING TO COMPLY WITH THE ORDER OF THE CHIEF JUSTICE OF THIS COURT;

AND

MOTION TO SANCTION APPELLANTS' ORIGINAL LAWYER FOR IMPROPERLY ADDING A MULTITUDE OF NEW LAWYERS TO THIS APPEAL WITHOUT PROPER NOTICE TO RESPONDENTS OR PERMISSION FROM THE COURT(S) IN UTILIZATION OF PROPER RULES OF SUBSTITUTION OF COUNSEL AND OTHER PERTINENT RULES.

Respondents/Appellants move herein for permission to proceed with their Initial Brief, previously submitted, which is slightly over the suggested page limit but which includes actual transcription pages from the original jury trial transcript, wrongly postured by Appellants as non-existent. Respondents/Appellants considered it to be in the interest of justice for this Honorable Court to see that the extensive three-day trial transcript does, in fact, exist with only a small portion destroyed or missing, and now reconstructed per Order of this Court;

That attachment was made for this purpose to the Initial Brief, being unusual circumstances that require a slight relaxation of any strict rules by this Court; That Appellants, in filing their wrongful initial Complaint and then abandoning the issue during this appeal, some three years after the jury verdict in favor of Respondents, have invoked the SC Frivolous Civil Proceedings Act and that their Motion should be immediately denied with strict adherence to the Briefing Schedule as imposed by this Court on these parties.

That Appellants wrongly attack Respondents as they are both verifiable pro se parties, well known to Appellants. Respondent Kathleen, is a senior citizen, has not practiced law since 1996 and was primarily a family law attorney, former prosecutor with limited association in appellate work and is not a licensed lawyer, also well known to Appellants and brought out in jury trial to the jury by Appellants in an apparent attempt to embarrass the parties and to prejudice her in trial, with effort now to prejudice this Appellate Court. Respondent Steve, is a senior citizen, a retired Air Force Lt. Colonel, hospital administrator and community volunteer, both entitled to proceed pro se without attack by Appellants.

That Appellants/Respondents have continued to add attorneys to this action to complicate this matter and attempt to bolster the frivolous nature of their proceedings in cross purposes to the very Electrical Cooperative of which Respondent is a member herself. That Respondent has NOT received any substitution of counsel motion from Appellants' attorney of record and knows of no substitution or formal association of any attorneys in this matter in accordance with required Court rules. If such addition or substitution has been made, then such must have been ex parte, which is protested. These pro se Respondents continue to see new attorneys added to this Appeal by Appellants and continue to have unauthorized communication and motion from others besides Appellants' attorney of record posing great confusion, added costs, and prejudice to Respondents, and all without the Court's permission or proper notice and input from Respondents.

The Respondents seek that:

Appellants' motion, filed by an attorney besides Appellants' attorney of record and/or improperly added attorney or attorneys, be dismissed with prejudice;

That Respondents pro se be allowed to expand as submitted their Initial Brief (and Final Brief) as reflected above with its transcription pages that are attached, thus allowing this Court to see the strength of the existing jury trial record, contrary to that suggested to this Court by Appellants AND as Respondents/Appellants have more issues to address than do Appellants/Respondents that have now abandoned their primary issue;

That the Final Brief of Respondents/Appellants is in route as directed by this Court and that NO extension of any Briefing schedule be made by this Court as all efforts were made by these pro se Respondents to comply with this Court's directives without a large staff and at great personal sacrifice to conclude this six-plus year litigation initiated by Appellants with original cause of action now abandoned by them.

Respectfully submitted,



Kathleen Jennings

(wrongly identified by Appellants as Gresham)



Steve Gresham

pro se

1524 Highway 11, Landrum, SC 29356

(Greenville County)

864-895-4222

None of the above or any of documents filed by these pro se Respondents/Appellants is imposed for the purpose of delay but in the sole interest of justice.

Ms. Jenny Abbott Kitchings  
S. C. Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

August 27, 2013

69423

RE: Blue Ridge Electrical Coop. vs. Gresham  
2008-CP-23-5245

Dear Ms. Kitchings,

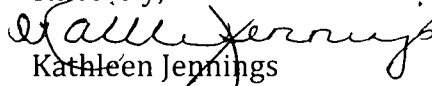
Enclosed please find the original and seven copies of the pro se Respondents/Appellants Motions for filing in the above matter along with a \$25.00 check that may be needed. Response to Appellants/Respondents' new motion is also included. The new motion was just received via U.S. Mail on August 27, 2013, though submitted by an attorney that has not been properly substituted or added to this proceeding as counsel of record in accordance with belief of Respondents/Appellants. Therefore, their motion is also questioned as properly before this Court as set forth in our return.

We have also mailed copies of the matters thus submitted herein to you, to Attorney of record for Appellants/Respondents Larry Brandt at his address in Walhalla, SC - P. O. Box 738, 3691 Blue Ridge Blvd, Walhalla, SC 29691, with sufficient postage attached. This is our certificate of mailing to him.

Enclosed please find a stamped, self-addressed envelope for return of a clocked-in copy of the enclosed back to us, as pro se Respondents/Appellants.

Thank you for your kind assistance. We are diligently trying to follow the Court's briefing schedule directed to us.

Sincerely,



Kathleen Jennings  
And Steve Gresham

pro se

Respondents/Appellants

1524 Highway 11, Landrum, SC 29356  
864-8954222

Enclosures as stated  
cc: Larry Brandt with stated enclosures

RECEIVED

SEP 02 2013

SC Court of Appeals

Mr. Larry Brandt  
Attorney  
P. O. Box 738  
3691 Blue Ridge Blvd.  
Walhalla, SC 29691

RE: Blue Ridge Electrical Coop. v. Gresham  
File no. 2008-CP-23-5245

Dear Mr. Brandt,

Find enclosed our return to the motion filed by Attorney Hamm et al; our motions;  
and copy of court correspondence indicating our certificate of mailing to you at your  
law firm address.

Sincerely,



Kathleen Jennings  
Steve Gresham

1524 Highway 11, Landrum SC 29356

enclosures as indicated

✓ cc: Clerk Jenny Abbott Kitchings, Court of Appeals