

BURTS TURNER & RHODES
ATTORNEYS AT LAW
260 NORTH CHURCH STREET
SPARTANBURG, S.C. 29306

SAM BURTS (1907 - 1982)
NOEL TURNER (1928 - 2011)
RICHARD H. RHODES
M. NOEL TURNER, III
WILLIAM H. RHODES
RYAN F. MCCARTY

MAILING ADDRESS
P.O. BOX 3408 29304
PHONE: 864-585-8166
FAX: 864-583-6927

September 27, 2013

Ms. V. Claire Allen
Deputy Clerk
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Launeil Sanders v. Janneth E. Sanders, Burts Turner & Rhodes, and Richard H. Rhodes

Case No.: 2011-191726

Dear Ms. Allen:

I am in receipt of Mr. Sander's Motion to Relax the Filing Requirements, along with an index labeled "Second Amended Record on Appeal." While Mr. Sanders provided us with a copy of the index, he has not provided us with a copy of the Record. Therefore, we do not know what is actually contained in the Record on Appeal. Based on what is listed in the index, we have numerous objections, as set forth below.

Mr. Sanders has listed items in the index for the Record that were not contained in either of the Designations of Matter. He was previously ordered by this Court to remove these items from the Record:

- (a) Original Complaint AMENDED, dated October 19, 2010 [This pleading is supposed to be attached as an exhibit to the Affidavit in Support of the Motion to Dismiss, dated January 25, 2011];
- (b) Original Complaint, dated October 4, 2010 [This pleading is supposed to be attached as an exhibit to the Affidavit in Support of the Motion to Dismiss, dated January 25, 2011];
- (c) Affidavit of Launeil Sanders and Answer to Complaint, dated October 12, 2010 [This Family Court pleading has not been mentioned in this Appeal]; and
- (d) Affidavit of Launeil Sanders and Answer to Amended Complaint, dated October 28, 2010 [This Family Court pleading has not been mentioned in this Appeal].

Additionally, because Mr. Sanders has not provided us with a copy of the Record on Appeal, we do not know whether he added certain items that he was ordered to add to the Record:

- (a) Answer, dated October 29, 2010;
- (b) Motion to Dismiss, dated November 2, 2010; and

RECEIVED
SEP 30 2013

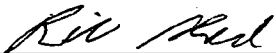
SC Court of Appeals

(c) Affidavit in Support of Motion, dated January 25, 2011.

In light of the foregoing, we respectfully submit that Mr. Sanders has failed to comply with the Court's Order of September 11, 2012 and the Court's Order of September 19, 2013. We would respectfully request that the Appellant's Motion to Reinstate the Appeal should be denied, and the remittitur should be sent as provided by Rule 221(b), SCACR. If the Court elects to grant Mr. Sanders' Motion to Reinstate the Appeal, we would respectfully ask that he be ordered to provide us with a copy of the Record on Appeal.

With kind regards, I am

Sincerely,



William H. Rhodes

cc: Mr. Launeil Sanders (Appellant)
William B. Darwin, Jr., Esq. (Attorney for Spartanburg County)

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS

THE HONORABLE J. DERHAM COLE
CASE NO. 2010-CP-42-05527

Launeil Sanders,

Appellant,

versus

Janneth E. Sanders, Spartanburg County, Burts, Turner & Rhodes,
and Richard H. Rhodes

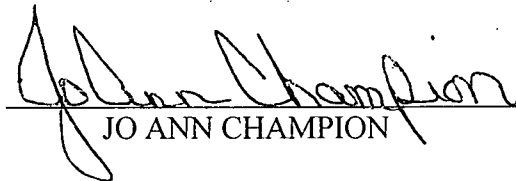
Respondent.

PROOF OF DELIVERY

This is to certify that on the 27th day of September, 2013, the undersigned, secretary to William Hardwick Rhodes, Esq., served a copy of the **LETTER DATED SEPTEMBER 27, 2013 TO THE SOUTH CAROLINA** by depositing a copy of the same into the United States Mail, postage pre-paid and in the correct amount to the following:

Mr. Launeil Sanders, Appellant
4005 Highway #11
Inman, SC 29349

William B. Darwin, Jr., Esquire
P.O. Box 1897
Spartanburg, SC 29304
Attorney for Spartanburg County


JO ANN CHAMPION

SWORN to before me this 27th
day of September, 2013

 (SEAL)
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 8/29/15

RECEIVED
SEP 30 2013
SC Court of Appeals