

THE STATE OF SOUTH CAROLINA
In The Court of
Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Steven C. Kirven, Master in

Equity

Case No. 2023-CP-37-00620

Ex Parte: Christopher A. Pierce, Appellant

Foxwood Hills Property Owners Association, Respondent,

v.

Michael D. Jewell, Lori Marcengill, South Carolina Department of Motor Vehicles,
Defendant's,

of which Michael D. Jewell is an Appellant.

MOTION TO EXPAND RECORD OF APPEAL


I make a request to the court to expand the appeal record due to extraordinary circumstances. These circumstances include the inability to submit crucial evidence the day of the Summary Judgment hearing on December 5, 2025. On that day, Christopher Pierce was driving me to the Oconee County Courthouse. We left early in order to get

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pictures printed at Walmart to provide evidence that Michael Jewell had a yard in well kept condition and should not have been subjected to fines on his property from the Foxwood Hills Property Owners Association. Appellant believes that these pictures would have been critical in preventing Summary Judgment against him.

Additionally we also planned to a notarized Affidavit to support the picture evidence. Due a tire blow up on Christopher Pierce's car Appellant Jewell was unable to get either pictures or Affidavit, as in the time needed to get an alternative ride to the courthouse prevented Jewell from getting pictures or Affidavit. Appellant Jewell asks for lienancy to allow this evidence to be added to the appeal due to the unforeseen car problems that prevented this evidence from being available to the court. Included as exhibit A is except from the transcript showing Jewell mentioned that he had pictures available to the court.

Thank you for your consideration,



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