

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Judge Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2024-000922

Case No. 2023-CP-40-02377

RECEIVED

APR 09 2025

SC Court of Appeals

Anthony Robert Taylor

Appellant,

v.

The State of South Carolina Office of Attorney General,
Alan Wilson

Honorable Frank R. Addy, Jr. 2159 Circuit 8

Attorney Jacqueline Marie Pavlicek, Esq., (which
Jacqueline Marie Pavlicek is the Respondent)

Respondents.

Pursuant to rule 36, Appellant move this court for a request for Admission, Motion, and Order for the truth of the matters within the scope of Rule 26(b)(1), relating to (B) the genuineness of the statements or documents made. A matter is admitted unless within 30 days after being served answer or objections addressing the matter must be signed by the undersigned attorney. A shorter or longer period for responding may be stipulated under Rule 29 or be ordered by the court. The Appellant, Anthony R. Taylor, move this court for a Request Motion for the genuineness of this document concerns Respondents initial brief and Designation of matters (see attached Exhibit (A)).

1st Review page one (1), according to the court filings, the Appellant filed his Initial Brief on November 8, 2024, and the Designation of Matters November 21, 2024. The Appellant had delivered many papers to the office of the undersigned attorney, who was unaware of the filings of these

matters. In fact, the undersigned was waiting for the Designation of Matters before responding with the Respondent's Initial Brief.

2nd Review page two (2) first paragraph, Respondent Pavlicek was always in this case, an employee of the City of Columbia in the City Attorney Office. She is now a lawyer in a private practice in the Columbia area. Review page two (2) second paragraph, from time to time, Mr. Taylor "serves" her by showing up to her office and dropping off papers, which he does at regular intervals. Some of these are relevant and some are not.

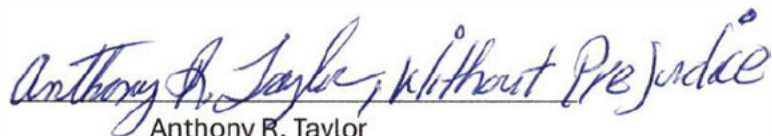
3rd Review, the Initial Brief and Designation of Matters, if dropped off at all, was not recognized as such.

4th Review, the Respondent Pavlicek hereby requests to leave brief outside of the time due to the confusion of service created by the Appellant.

5th Review, fifth paragraph, Appellant Believes the delay to be minimal to the proceeding as the court has not yet set this matter for a hearing and neither Appellant nor the other Respondents have suffered any prejudice by the brief delay. This Admission Order, involving law as well as facts, removed one of the lawsuits and thereby reduced the proof required at trial or appeal.

We should be able to resolve, or a mediation would be beneficial by granting a Request Order under these circumstances.

Respectfully submitted,

 *Anthony R. Taylor, Without Prejudice*

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

Exhibit-A'

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2024-000922
Case No. 2023-CP-40-02377

Anthony R. Taylor,

Appellant,

v.

The State of South Carolina Office of Attorney General Alan Wilson, Honorable Frank R. Addy,
and Attorney Jacqueline Marie Pavlicek¹,

Of which Attorney Jacqueline Marie Pavlicek is the respondent,

Respondent.

**RESPONDENT JACQUELINE MARIE PAVLICEK'S MOTION TO SERVE AND FILE
HER INITIAL BRIEF AND DESIGNATION OF MATTER OUT OF TIME**

According to the court filings, the Appellant filed his Initial Brief on November 8, 2024 and the Designation of Matter on November 21, 2024. The Appellant had delivered many papers to the office of the undersigned attorney, who was unaware of the filings of these matters. In fact, the undersigned was waiting for on the Designation of Matter before responding with the Respondent's Initial Brief.

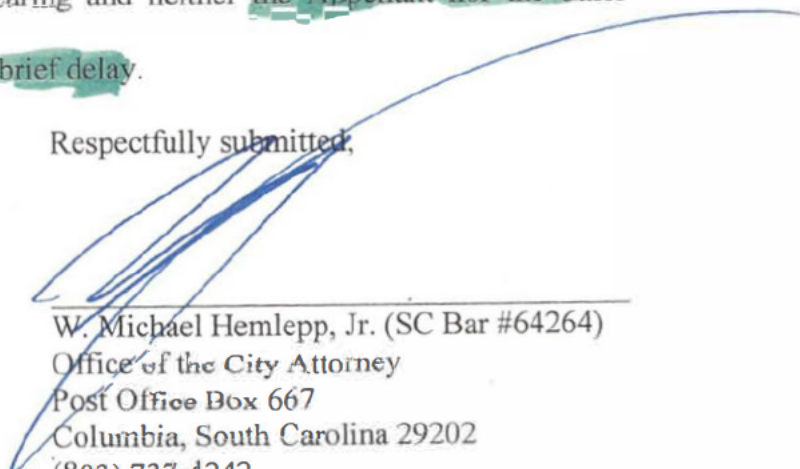
¹ Respondents Attorney General Alan Wilson and the Honorable Frank R. Addy have been dismissed by order of the Court on August 29, 2024.

Respondent Pavlicek was, at all times in this case, an employee of the City of Columbia in the City Attorney's Office. She is now a lawyer in private practice in the Columbia Area. From time to time, Mr. Taylor "serves" her by showing up to her office and dropping off papers, which he does at regular intervals. Some of these are relevant and some are not. The Initial Brief and Designation of Matter, if dropped off at all, was not recognized as such.

On January 15, 2025, the undersigned was informed the initial brief Respondent Jacqueline Marie Pavlicek's Initial Brief and Designation of Matter were delinquent by letter of Catherine Harrison of the Clerk's Office of the South Carolina Court of Appeals. The Respondent Pavlicek hereby requests leave to brief outside of the time due to the confusion of service created by the Appellant.

The undersigned has not contacted the *pro se* Appellant to consult regarding this request to allow Respondent Pavlicek's Initial Brief and Designation to be filed out of time. Respondent Jacqueline Marie Pavlicek, by and through its attorney, hereby requests the Court accept the filing of its Initial Brief and Designation of Matter on February 28, 2025, as permissible under the circumstances. Appellant believes the delay to be minimal in impact to the proceedings as the Court has not yet set this matter for a hearing and neither the Appellant nor the other Respondents have suffered any prejudice by the brief delay.

Respectfully submitted,


W. Michael Hemlepp, Jr. (SC Bar #64264)
Office of the City Attorney
Post Office Box 667
Columbia, South Carolina 29202
(803) 737-4242
Attorney for Respondent Jacqueline Marie Pavlicek

January 21, 2025

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge
G. Thomas Cooper, Circuit Court Judge

Appellate Case No. 2018-000948
Case No. 2015-CP-40-05598

Anthony Taylor,

Appellant,

v.

The State of South Carolina Attorney General Alan Wilson, The Honorable Frank Addy, and
Attorney Jacqueline Marie Pavlicek,

Of whom Attorney Jacqueline Marie Pavlicek is the Respondent,

Respondent.

PROOF OF SERVICE

I certify that I have served *Respondent Jacqueline Marie Pavlicek's Motion to File Initial Brief and Designation of Matter Out of Time* upon the Appellant by depositing copies of them in the United States Mail, postage prepaid to them at their addresses shown below on this 21st day of January, 2025:

ANTHONY TAYLOR
1549 Lilly Avenue
Columbia, South Carolina 29204

****SIGNATURE ON NEXT PAGE****

Respectfully submitted,



W. Michael Hemlepp, Jr. (SC Bar #64264)
Office of the City Attorney
Post Office Box 667
Columbia, South Carolina 29202
(803) 737-4242
Attorney for Respondent Jacqueline Marie Pavlicek

January 21, 2025

Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2024-000922

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SC Court of Appeals

Anthony Taylor,

Appellant,

v.

The State of South Carolina Office of Attorney General, Alan Wilson, Honorable Frank R. Addy, Jr.,
and Attorney Jacqueline Marie Pavlicek,

Of whom Attorney Jacqueline Marie Pavlicek is the Respondent,

Respondent.

PROOF OF SERVICE

I certify that I have served a request for Admission, Motion, and Order by depositing copies of them
in the United States Mail, postage prepaid and/or personally delivered to them at their addresses
shown below on this 9th day of April 2025:

William Mike Hemlepp Jr., Esq. (Bar #64264) (their attorney of record)
Post Office Box 667 Columbia, South Carolina 29202
Michael H. Montgomery
Post Office Box 11886 Columbia, South Carolina 29211

*****Signature is on the following **page***

Respectfully submitted,

Anthony R. Taylor, Without Prejudice

s/ Anthony Robert Taylor
1549 Lilly Avenue
Columbia, South Carolina 29204
(803) 463-7725

April 9, 2025

Columbia, South Carolina