

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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May 27 2025

SC Court of Appeals

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APPEAL FORM YORK COUNTY  
COURT OF COMMON PLEAS

William A. McKinnon, #2761 Circuit Court Judge

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Appellate Case No. 2024-000279

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Rock Pointe II,

Respondent

vs.

Ashley Williamson,

Appellant

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**PROOF OF SERVICE**

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The Appellant, Ashley Williamson, Pro Se Litigant, hereby and respectfully moves this Honorable Court to dismiss the Respondent's Motion to Dismiss the Appellant's Appeal, in support of this Motion, the Appellant states as follows:

1. The Respondent's Motion to Dismiss seeks to deprive the Appellant of her constitutionally protected right to a fair hearing and access to the Court.
2. The Appellant is a Pro Se Litigant who, while not trained in the law, is earnestly seeking to present her case and evidence before the Court. Her lack of legal expertise should not be construed as a basis for dismissal or delay.
3. The Respondent's attorney has mischaracterized the Appellant's inexperience as an intentional delay tactic. This assertion is unfounded and serves only to prevent the Court from hearing critical facts central to the resolution of this matter.
4. Furthermore, the Respondent's actions appear designed to prevent the Appellant from introducing key evidence, thereby denying the Court the opportunity to render a fair and impartial decision.

5. The Appellant respectfully requests that, should the Respondent's attorney continue to demand that the Appellant's filings mirror the work of a trained and licensed attorney, the Court consider appointing counsel to assist her. As a single mother of eight children, the Appellant does not have the financial resources to secure competent legal representation.

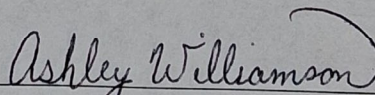
6. To deny the Appellant the opportunity to present her case due to her lack of legal knowledge or access to legal counsel would have the same effect as allowing the Respondent to prevail without presenting any supporting evidence. Such an outcome undermines the principle of equal justice under the law.

7. The Respondent's vigorous efforts to have this appeal dismissed suggest an unwillingness to resolve the matter on its merits through the judicial process. A fair decision must be based on the facts and evidence—not on an untrained individual's ability to navigate complex legal procedures and to understand case law.

WHEREFORE, the Appellant respectfully requests that this Honorable Court:

- Deny and dismiss the Respondent's Motion to Dismiss the Appellant's Appeal in its entirety;
- Allow the Appellant to present her case and supporting evidence;
- Consider the appointment of legal counsel for the Appellant, if deemed appropriate; and
- Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 27<sup>th</sup> day of May, 2025.



Ashley Williamson  
Appellant, Pro Se  
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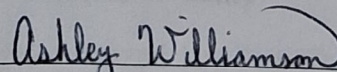
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**PROOF OF SERVICE**

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I certify that I have served the Motion to Dismiss the Motion to Dismiss the Appeal of Ashley Williamson by depositing a copy of it in the United States Mail, postage paid May 27, 2025, and addressed as follows:

Biddle Law Firm, LLC  
Attorney James Marshall Biddle  
311 Beaty Street, Suite A  
Conway, SC. 29526



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