

In The State of South Carolina
In The Court of Appeals

Appeal From Spartanburg County
Honorable Martha M. Rivers

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SEP 17 2025

SC Court of Appeals

Appellate No. 2025-000308
Trial Court No. 2024-CR-42-02781

Carnie Norris III Appellant
vs
Dr Gary W. Poliakoff Respondent

Appellant's Reply To Respondent's
Return

Carnie Norris III
Perry Corr. Inst.
430 Oaklawn Rd
Pelzer, SC 29669

Reply

The Appellant Carme Morris III. submits this Reply to Respondent's Return because Respondent have continuously misrepresented the true and accurate facts pertaining to procedural and substantive grounds.

The appellant proceeding Pro Se have corrected all of the deficiencies pertaining to the appeal within the required timeframe.

The appellant was informed that the time to order the transcript had expired. At that time, appellant sent to the Court a copy of the transcript that was in his possession, to include the Record on Appeal. Appellant's handwritten Initial Brief is not hard to discern. The Respondent is trying to mislead this Court and persuade it to deny the appeal based upon fabrication and fabrication.

When the appellant filed his Reply Brief, enclosed was also the Record on Appeal in which the Court was notified also. The Respondent have received a total of 2 Records on Appeal from the Appellant.

The appellant have paid the fee for the appeal and motions that he filed, have corrected all the deficiencies within the required time frame.

The Respondent should not be allowed to put Appellant to the burden and expenses of repeatedly several times of sending them the Record on Appeal. This is a tactic that The Respondent is trying to use to persuade the Court to dismiss Appellant's appeal.

The Respondent is clearly putting forth several frivolous arguments which have no merit. Appellant have complied with these Appellate Court rules, Appellant's motion have substantive merit and Appellant's appeal have merit.

The Record before this Court will show that the Respondent Gary W. Poliakoff conspired and assisted in hiding criminal and fraudulent acts committed by his clients Charles and Clyde Norris. As an officer of the Court, Poliakoff made deliberate and intentional false and misleading statements to a third party (Appellant) and the Common Pleas Court pertaining to the Estate of Mary T. Norris. Respondent Poliakoff promoted his clients false and misleading statements as the truth even after it was verified that they (clients) were lying.

The Respondent was not prejudiced in anyway because they had requested several extensions and finally served the appellant on September 5, 2015 with their Return.

This Honorable Court have not had any problems with appellant's handwritten pleadings as the Respondent's have complained about. Their arguments and contentions have no merit.

Appellant further submits that the actions of the Respondent is tantamount to intrinsic fraud. *Raby Const. H.L.P. v. Orr*, 358 S.C. 10, 594 S.E.2d 478 (2004) (intrinsic fraud is fraud which misleads a court in determining issues and induces the court to find for the party perpetrating the fraud). This is exactly what the Respondent is attempting to do by misconstruing the issues on appeal which Appellant has raised and misrepresenting those issues to the tribunal.

The Respondent have not served the appellant with any of their Designated exhibits as of date.

Enclosed you will find copies of all the
certificates of services that will show that
the Respondents have put forth a meritless
argument pertaining to the Record on Appeal.
Conclusion

The appellant Corrie Morris III respectfully
request this honorable court to deny any
and all portions of the Respondents return
because of the fabrication in their procedural
grounds are false, and grant appellant's motion
for permission to serve and file out of time
the final brief which was already served.

I, Corrie Morris III, certify and verify
under the penalty of perjury that the foregoing
is true and correct.

Corrie Morris
9-8-25

State of South Carolina } S.C. Court of Appeals
County of Spartanburg } # 2025-000306

Cornie Morris ^{III}
Appellant } Certificate of Service
vs
Gary W. Pidiakott
Respondent }

I, Cornie Morris ^{III} certify that I have served the Respondent with a copy of my Reply to Respondent's Return by placing a copy in the Perry mailroom hands for mailing, postage prepaid, address as follows:

Thomas Pender's
Pender's Law Offices, P.A.
710 Boundary St. Unit A-1
Beaufort, S.C. 29902

I, Cornie Morris ^{III} do hereby certify and verify under the penalty of perjury that the foregoing is true and correct.

Cornie Morris
9-8-25

State of South Carolina } S.C. Court of Appeals
County of Spartanburg } # 2025-00306

Carnie Morris III
Appellant

Certificate of Service

vs
Dr. Gary W. Poliakoff
Respondent

I, Carnie Morris III, certify that I have served the Record on Appeal on the Respondents by placing a copy in the Perry waitroom hands for mailing, postage prepaid, addressed as follows:

Thomas A. Pendorvis
Pendorvis Law Offices, P.C.
210 Boundary St. Unit A-1
Beaufort, SC 29902

I, Carnie Morris III, certify and verify under the penalty of perjury that the foregoing is true and correct.

Carnie Morris

3-12-25

State of South Carolina } S.C. Court of Appeals
County of Spartanburg } #2025-000306

Carnie Morris III } Designated matters To
Appellant } Be Included on Appeal
vs }
Dr. Gary W. Pollock }
Respondent }

I, Carnie Morris III certify that I have submitted the following documents Designated matters To Be Included on Appeal.

- 1) Summons + Complaint (2024-CF-42-02781)
- 2) Letter dated December 16, 2021
Affidavit of Zandra Johnson-Scott
- 3) LW+T of Mary F. Morris (Draft)
- 4) Letter dated December 11, 2020
Letter dated December 30, 2021
- 5) Order Granting Defendant's
motion to Dismiss

Carnie Morris
3-12-25

State of South Carolina) S.C. Court of Appeals
County of Spartanburg) #2025-000306

Carnie Norris III
Appellant

vs

Dr. Gary W. Poliakoff
Respondent

Record on Appeal

The appellant Carnie Norris III in the above
entitled case respectfully submit the Record on
Appeal:

- 1) Transcript of Record dated October 30, 2024
- 2) Before Honorable Martha Rivers, Judge
- 3) Appearance: Carnie Norris/Pro Se
- 4) Thomas A. Penderius
Attorney for Defendant.

Carnie Norris

3-12-25

Re: Carnit Morris #227226

Dr Gary Poliakoff
C/A 2025-000306

Dear Honorable Harrison,

Pursuant to your letter dated March 12, 2025 which was received by me on 3-17-25, I forwarded to the Court and to the above listed party the record (transcript) Initial Brief and designated matters on 3-12-25.

By date of this letter, you should have already received my documents. would you please acknowledge receipt.

I, Carnit Morris #227226 certify and verify under the penalty of perjury that the foregoing is true and correct.

Carnit Morris
3-17-25

Re: Fed Home Loan Mortgage Corp. v.
Charles Morris as legal heir et al.

Dear Mrs Falin,

The Respondents attorney Vanden
Wibert is trying to misconstrue the
record in the above case.

Mr Pherson of McGuire Woods LLP
was served with the complete record on
appeal, which is accurate and relevant.
Mr Pherson had a duty to transfer the
file of appellants to the new attorney.
Respondent referenced see Exhibit 1,
which appellant did not receive.

As can be seen from the enclosed
copies, the Respondent is acting out
of "bad faith"

once again, appellant will serve
his designation of matters on the Respondent
Vanden Wibert. Attorney Henry buyton
marrell of Scott & Corley was also served
on 4-24-25. This law firm is also acting
out of "bad faith" for failure to be truthful,
see Received on July 3, 2024 (SC Court of Appeals)

I, Charles Morris III certify and verify under
the penalty of perjury that the foregoing is
true and correct.

Charles Morris

5-21-25

State of South Carolina } SC Court of Appeals
County of Spartanburg } # 2015-000306

Cornie Morris III } certificate of service
Appellant }
vs }
Dr Gary W. Poliakoff }
Respondent }

I, Cornie Morris III certify that I have served the below Respondent with a copy of the Initial Brief and Record on Appeal by placing a copy in the Perry mailroom hands for mailing, postage prepaid, addressed as follows:

Thomas A. Pendervis
Pendervis Law Office, P.C.
710 Boundary St. Unit A-1
Beaufort, S.C. 29902-4188

I, Cornie Morris III, certify and verify under the penalty of perjury that the foregoing is true and correct.

Cornie Morris
6-18-15

State of South Carolina } S.C. Court of Appeals
County of Spartanburg } # 2025-000306

Carnie Morris III } Certificate of Service
Appellant }
✓
Dr. Gary W. Poliakoff }
Respondent }

I, Carnie Morris III, certify that I have served the Respondent with a copy of my Final Brief by placing a copy in the Perry mailroom hands for mailing postage prepaid, addressed as follows:

Thomas A. Rendarvis
Rendarvis Law Office, P.C.
710 Boundary St., Unit A-1
Beaufort, S.C. 29902-4188

I, Carnie Morris III, certify and verify under the penalty of perjury that the foregoing is true and correct.

Carnie Morris
8-7-25

State of South Carolina } S.C. Court of Appeals
County of Spartanburg } #2025-000306

Cornie Morris, IV
Appellant

v.
Dr. Gary W. Poliakoff
Respondent

} Certificate of Service

I, Cornie Morris, IV, certify that I have served the Respondent with a copy of a motion for Permission To Serve and file out of time, by placing a copy in the Perry mailroom ready for mailing postage prepaid, addressed as follows:

Thomas A. Bendavis
Bendavis Law Office, P.C.
710 Boundary St, Unit A-1
Beaufort, S.C. 29902-4188

I, Cornie Morris, IV, certify and verify under the penalty of perjury that the foregoing is true and correct.

Cornie Morris
8-7-25

State of South Carolina) S.C. Court of Appeals
County of Spartanburg) 2025-000306
2024-CP-42-02781

Cornie Morris III
Appellant
vs
Dr. Gary W. Poliakoff
Respondent
} Certificate of Service

RECEIVED

SEP 17 2025

SC Court of Appeals

I, Cornie Morris III certify that I have served the Respondent with a copy of the hearing transcript dated Oct. 30, 2024 by placing a copy in the Perry mail room hands for mailing, postage prepaid, addressed as follows:

Thomas A. Pendervis
Pendervis Law Offices, P.C.
710 Boundary St, Unit A1
Beaufort, SC 29902-4188

I, Cornie Morris III certify and verify under the penalty of perjury that the foregoing is true and correct.

Cornie Morris

8-14-25

Carnie Morris #507226
Perry Court Just. #48220
430 Oaklawn Rd
Pelzer, S.C. 29669

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SEP 17 2025

SC Court of Appeals



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Clerk
S.C. Court of Appeals
1220 Senate St
Columbia, SC 29201

LEGAL MAIL