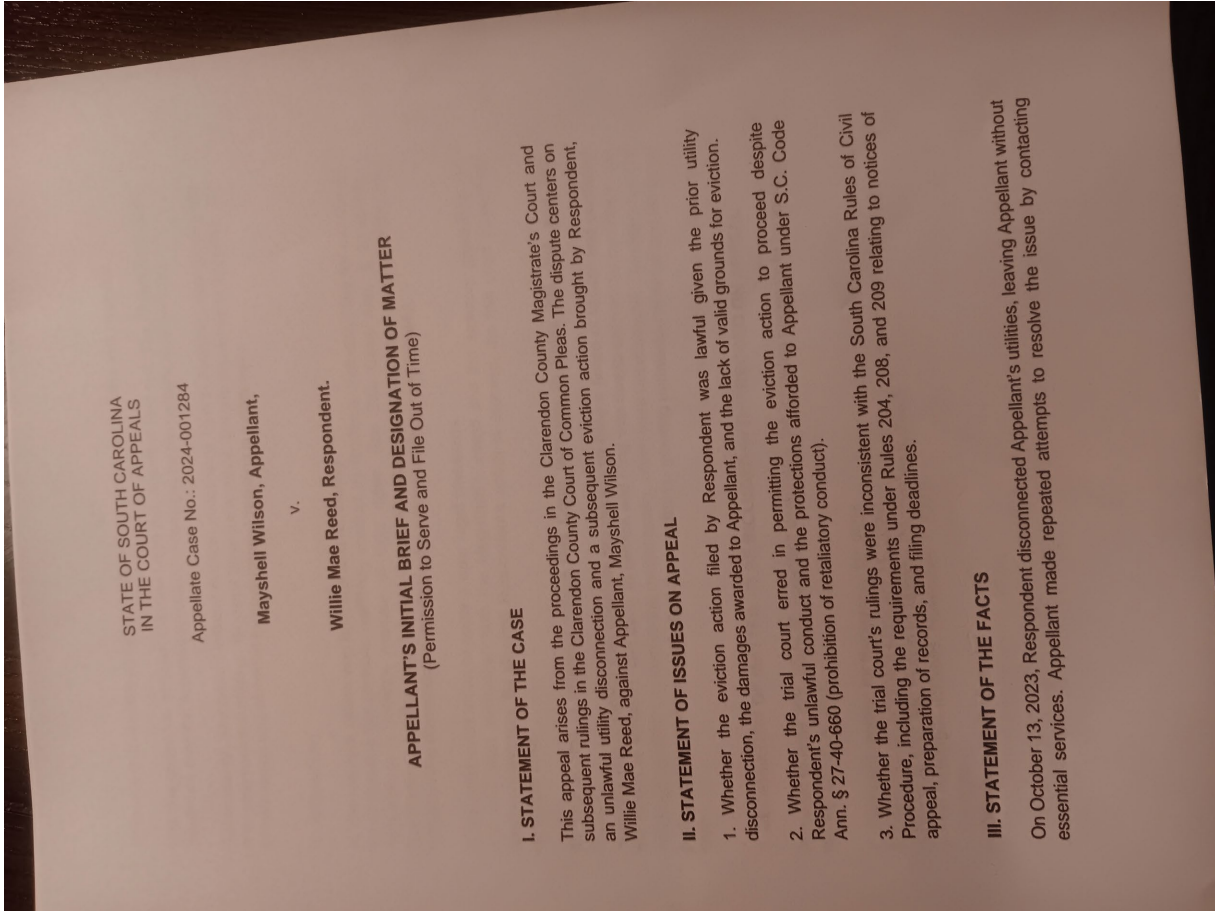


From: mayshell.wilson
To: [Court Of Appeals Filings; wvbarr@wvbarrlaw.com](mailto:wvbarr@wvbarrlaw.com)
Date: Thursday, September 18, 2025 10:24:27 PM
Attachments: [Master Filing Packet SC \(2\).pdf](#)

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Respondent, local utility providers, and law enforcement, but no relief was obtained.

With the assistance of South Carolina Legal Aid, Appellant filed suit. The Clarendon County Magistrate awarded Appellant \$2,605.00 in damages for the unlawful disconnection.

Subsequently, Respondent initiated eviction proceedings against Appellant, disregarding the prior judgment and lacking any lawful basis for removal. Despite the award to Appellant, the eviction action was permitted to move forward, resulting in further harm.

IV. ARGUMENT

A. The eviction action was unlawful and retaliatory.
South Carolina law prohibits retaliatory conduct by landlords, including filing for eviction in response to a tenant's exercise of legal rights. See S.C. Code Ann. § 27-40-660. Respondent's eviction filing followed directly after Appellant's successful claim regarding the unlawful utility disconnection, rendering the eviction retaliatory and unlawful.

B. The trial court failed to apply proper legal standards.
The trial court overlooked both the Magistrate's award and the statutory prohibition on retaliatory eviction. By allowing Respondent's action to proceed, the trial court committed reversible error.

C. The appeal is properly before this Court pursuant to Rules 204, 208, and 209, SCACR.
Appellant has complied with appellate procedures by filing a notice of appeal and preparing the record as required. The delay in service and filing was due to unforeseen circumstances and ongoing efforts to resolve the matter locally, which were unsuccessful. The delay has not prejudiced Respondent, and good cause exists for granting permission to serve and file out of time.

V. DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 209, SCACR, Appellant designates the following materials to be included in the Record on Appeal:

1. Transcript request for September 19, 2024
2. Transcript of Judgment (January 11, 2024)
3. Notice to Quit and Motion to Dismiss (November 9, 2023)
4. Text messages (Exhibits, November 7, 2023)
5. Complaint
6. Exhibits submitted at trial
7. Police Report (December 11, 2024)
8. Clarendon County Court Roster (June 12, 2024)
9. Amended Order (October 31, 2024)

- 10. Court eviction orders (December 4, 2024; January 25, 2024; November 31, 2023; December 9, 2024)
- 11. Correspondence with Respondent (October 23, 2023)
- 12. Receipts and payment records

Appellant certifies that the above list contains all matters relevant to this appeal.

VI. PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests that this Court:

- 1. Grant permission to serve and file this Initial Brief and Designation of Matter out of time;
- 2. Accept the attached Record on Appeal; and
- 3. Reverse the trial court's rulings permitting the eviction action, and grant such further relief as this Court deems just and proper.

Respectfully submitted,

Dated: August 14, 2025
Revised: September 18, 2025

/s/ Mayshell Wilson
Mayshell Wilson, Appellant
6411 Summerton Hwy
Manning, SC 29102

Certificate of Service

I, Mayshell Wilson, certify that a copy of this Motion, Initial Brief, and Designation of Matter has been served upon Respondent Willie Mae Reed and her counsel, William Joseph Virgil Barr, on June 20, 2025, by U.S. Mail.

/s/ Mayshell Wilson

Mayshell Wilson
Revised: September 18, 2025

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