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Nov 12 2025

SC Court of Appeals

FORM 7

PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master-In- Equity

Mikell R. Scarborough, Master -In- Equity

Case No. 2021-CP-10-05234

TOMEKA SHAYRON ELMORE

Appellant,

v.

FREDERICK FIELDS, ET AL

Respondents

JULIE J. ARMSTRONG
CLERK OF COURT
2025 NOV 12 PM 3:04

FILED

PROOF OF SERVICE

I certify that I have served the Notice of Motion to Stay w/ Reply on Respondents' Attorney, Bruce E. Berlinsky, by hand delivering a copy to him on November 12, 2025 at his address, 1 Carriage Lane, Suite F, Charleston, SC 29407.

TShayron
Tomeka Shayron Elmore
3074 River Road
John's Island, SC 29455
tmshayron@gmail.com
(843)432-8635
Pro Se

Response to Appellant Motion To Stay Reply

message

Tomeka Elmore <tmshayron@gmail.com>
: Tomeka Elmore <tmshayron@gmail.com>

Wed, Nov 12, 2025 at 12:52 AM

Response to Appellant Motion To Stay Reply

I Tomeka Elmore express as it relates to case number 2021-CP-10-05234 that everything shared with the court from Mr. Berlinsky in regards of the pictures of equipment, and documents were all used to get the restraining order on William Staley and not on me. William Staley is who my grand aunts and uncles testified against alleging he threatens them, and he was damaging property. The Affidavit of Steve Harris is all connected to William Staley expressing that he knew I was at the property. William Staley has no credibility on my whereabouts and the very same property mentioned here he has a restraining order on him and is seen on their property with Mr. Berlinsky's clients, "my grand aunts and uncles." I'm married and haven't been with William Staley over 3 years now. The Affidavit of Steve Harris also served the wrong property at 3092 River Road which is stated in the affidavit of service filed by Berlinsky with Steve Harris. It is well known by Berlinsky and his clients, "my grand aunts and uncles" that this 3092 River Road address is their address and the wrong address for me which is already on file. I was given a forever lease, I have Squatters rights from being here over 10 years paying taxes and given the right to up keep the property by Frederick Fields, and during my occupation of the property I've had Adverse possession, exclusive possession, and continuous possession since 2009. Since I've also shown Open and notorious possession, I received a quitclaim deed September 9th 2022. The property is grandfathered in I'm an heir, and in conjunction with the Clemente Pickney Act opposes the requests of Mr Berlinsky and prevents the partitioning party from also buying me out with me being an heir. I was never served papers at my address 3074 River Road and the correct address has already been listed and corrected on file long before this date with the courts. On July 26, 2022 a permit address form updated the correct address in the system and have been corrected in court as well when Berlinsky has insisted on using the wrong address on file. It was stated Berlinsky never seen a return in the mail service but that would be a question for his clients who own the address at 3092 River Road where his papers were sent; not at my address 3074 River Road. Berlinsky deliberately served his clients own address resulting in no return to the mail service and also me not aware of what took place or being able to respond. How could William Staley be credible for knowing where I am and I haven't been around him in 3 years. I've been with my husband for the last 3 years. All the pictures of William's equipment and documents presented here by Mr Berlinsky shows all the issues they had with my ex boyfriend who's been long gone and what led to them filing a restraining order on him not me. I pose no risk, hurt, harm, danger or problems to my grand aunts and uncles on our land then or now. I haven't build or changed anything on our land and the restraining order was against William Staley; the same individual being used to guess my whereabouts in the Affidavit Berlinsky attached and he is always seen on their property with them. I ask the court to look at the facts here in The Motion To Stay to stand on the facts of the law being violated here on Mr Berlinsky's behalf on purpose as it relates to an illegal eviction and improper delivery of these important documents. According to the courts record I've also explained the endangerment to my two kids 10 and 6 in lifting my Motion To Stay. I believe the intent to serve the wrong address is clearly to prevent a response from me in a timely manner to the order and having the advantage of me being unaware and unable to respond. The only unclean hands are those of Mr. Berlinsky and his clients, "my grand aunts and uncles" who issued the forever or permanent lease and attempted to revoke terms agreed upon leading to actions in bad faith. Before my quitclaim deed was issued I was given permission to hire personnel or to beautify the property at my discretion from my grand uncle Frederick Fields and the disagreement with William Staley led to retaliation by my grand uncle, Frederick Fields and company to issue a restraining order on William Staley and our current position in court.

Sincerely,



Tomeka S. Elmore

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