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**Oct 29 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY

Court of Common Pleas

Jessica A. Salvini, Circuit Court Judge

Civil Action No. 2024-CP-23-02744

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Appellate Case No: 2025-001550

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Bruce Wilson, ....., Appellant

v.

Pranceton Rodrigues Williams and Ennis M. Fant., Defendants,

Of Whom Ennis M. Fant....., Respondent.

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**MOTION FOR RECONSIDERATION OF THE  
CLERK'S DEFICIENCY LETTER DATED OCTOBER 29, 2025**

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**TO: THE HONORABLE COURT OF APPEALS OF SOUTH CAROLINA**

**NOW COMES** the Appellant, Bruce Wilson, *pro se*, and respectfully moves this Honorable Court for reconsideration of its Deficiency Letter dated October 29, 2025. In support of this Motion, Appellant states the following:

On October 29, 2025, the Clerk of Court for the South Carolina Court of Appeals issued a deficiency letter regarding the Appellant's Initial Brief and Designation of Matter.

The letter states the accompanying Proof of Service is non-compliant because it "does not show service to respondent's counsel at the correct address," and directs Appellant to serve counsel at 1315 Blanding Street, Columbia, SC 29201.

Appellant respectfully avers that service was, in fact, performed correctly. The Respondent's counsel of record, Austin D. Nichols, Esq., of the Rutherford Law Firm, consistently uses and designates P.O. Box 1452, Columbia, South Carolina 29202 as his official mailing address for service of all pleadings and filings in this matter.

Furthermore, all filings submitted by the Appellant to this Court to date have properly utilized this P.O. Box address for service upon Respondent's counsel, without prior objection from counsel or the Court.

This service method has been explicitly accepted by this Court in prior proceedings. The Appellant filed a Motion to Stay with this Court on August 12, 2025, serving Respondent's counsel at the same P.O. Box address via the Court's filing system. This Court accepted that filing, considered the Motion, and issued a ruling on it on August 26, 2025, without any notation of improper service.

Serving an attorney at their designated mailing address, especially a Post Office Box which is specifically maintained for receiving legal mail and has been previously accepted by this Court, is proper and in accordance with standard practice.

Regarding the Court's email address, the Appellant utilized this Court's electronic filing system to serve all filings, which automatically generated a copy to the Respondent's counsel at their registered email address. The inclusion of the Court's email was an administrative function of the system intended to create a complete service record and was not an attempt to serve the Court directly. This method ensured immediate and verifiable delivery to opposing counsel and was identical to the method used for the previously accepted Motion to Stay.

Critically, Appellant wishes to bring to the Court's attention that the Respondent's Initial Brief was filed on September 26, 2025. As of the date of this filing, the Respondent has failed to file an Initial Brief, and the time for doing so has expired.

Pursuant to SCACR Rule 208(b)(1)(B), a respondent's failure to timely file a brief "may be deemed an admission that the appeal should be decided adversely to that party." The Respondent, having missed this critical deadline, should be excluded from filing a brief at this time, and the appeal should be decided on the merits of the Appellant's brief alone.

Appellant has made every good-faith effort to comply with the South Carolina Appellate Court Rules (SCACR), utilizing the addresses and systems provided by both opposing counsel and the Court itself. It is inconsistent and prejudicial to now deem a service method deficient that was previously accepted and acted upon by this Court, especially while the Respondent's substantive failure to prosecute its defense is overlooked.

**WHEREFORE**, Appellant Bruce Wilson respectfully prays that this Honorable Court:

1. Reconsider its Deficiency Letter dated October 29, 2025;
2. Find that the Appellant's service upon Respondent's counsel at P.O. Box 1452 was proper and compliant with the SCACR, as previously established by this Court's acceptance of the August 12, 2025 Motion to Stay;
3. Deem the Appellant's Initial Brief and Designation of Matter as filed and in compliance with the rules;
4. Take judicial notice of the Respondent's failure to file a timely brief and, in accordance with SCACR Rule 208(b)(1)(B), exclude the Respondent from filing a brief and deem this failure an admission that the appeal should be decided adversely to the Respondent; and
5. Allow this appeal to proceed to a decision on its merits based upon the Appellant's submissions.

Respectfully submitted

By: /s/ Bruce Wilson  
Bruce Wilson  
14 Freestone St.  
Greenville, SC 29605  
brucewilson23@gmail.com  
**Pro Se Appellant**

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Of Whom Ennis M. Fant....., Respondent.

**CERTIFICATE OF SERVICE**

I, Bruce Wilson, hereby certify that on this 29<sup>th</sup> day of October, 2025, I served a true and correct copy of the foregoing Motion for Reconsideration upon Respondent's counsel, Austin D. Nichols, Esq., via the Court's e-filing system and email to: austin@rutherford.law and by depositing it in the United States Mail, postage prepaid, addressed to:

Austin D. Nichols  
The Rutherford Law Firm  
1315 Blanding Street  
Columbia, South Carolina 29201

By: /s/ Bruce Wilson  
Bruce Wilson  
14 Freestone St.  
Greenville, SC 29605  
brucewilson23@gmail.com  
**Pro Se Appellant**