

RECEIVED

Dec 29 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No: 2025-002408

Debra Nelson, Appellant,

v.

Hunt Law, LLC and
Bonnie Travaglio Hunt, Esq., Respondents.

**RESPONDENTS' RETURN TO APPELLANT'S
'MOTION TO STRIKE IMPROPER AND IRRELEVANT ALLEGATIONS AND TO LIMIT
ARGUMENT TO THE MERITS'**

Respondents, by and through their undersigned counsel, submit this Return to Appellant's Motion to 'strike improper and irrelevant allegations and to limit argument to the merits.' For the reasons set forth in this Return, the Court should deny Appellant's Motion.

As detailed below, the referenced matters are directly responsive to Appellant's own assertions in her Motion and are neither prejudicial nor improper.

FACTS RELATIVE TO APPELLANT'S MOTION

Appellant filed a Motion to allow the late filing of this appeal on December 12, 2025. The subject of that Motion is as stated in the title – Appellant seeks leave to file her appeal late. Respondents filed a Return to that Motion on December 17, 2025. Appellant has now filed a Motion asking the Court to strike, arguing: (1) ‘respondents inject collateral matters outside the record;’ (2) ‘Respondents refuse to address the merits of the appealed Order;’ (3) the allegations are prejudicial and improper on appeal; (4) ‘Appellant seeks merits-based review, not collateral litigation.’ Respondents address each argument in turn; and (5) ‘Respondents’ irrelevant allegations mirror improper communications and ignored objections.’ Appellant’s Motion contains no supporting authority.

ARGUMENT

1. Injection of collateral matters outside the record.

Appellant argues “collateral litigation history is not probative of whether the trial court acted impartially or in accordance with due process in the case at bar.” However, Appellant’s Motion asks the Court to allow her to file this appeal out of time. Therefore, whether the Court should allow this is the *only issue* before the Court with respect to that Motion, and matters related to that question are relevant to the Motion.

Moreover, Appellant’s Motion raised her “active litigation in related matters in both state and federal courts” as a ground for allowing her to file the appeal late. Appellant made her multiple other lawsuits (“collateral litigation”) a subject of her Motion. Therefore, they are properly considered with respect to a Return to that Motion.

2. Refusal to address merits of the appealed Order.

At issue is Appellant's Motion to file her appeal late. Respondents' Return to that Motion appropriately addresses that issue. A Return to a Motion to file an appeal late is not the proper medium by which to argue the merits of Appellant's appeal. The merits of Appellant's appeal have nothing to do with whether the Court should allow her to file her appeal late. Respondents will submit arguments on the merits at the appropriate time pursuant to the Appellate Court Rules and the Court's direction.

3. Propriety of allegations

Again, Appellant seeks to file her appeal late. Her Motion seeking leave to do so raises her other federal and state court pending cases as a ground to file a late appeal. In other words, Appellant made her litigation history relevant to her request to file the appeal late. There is nothing improper about discussing those cases in a Return to Appellant's Motion.

4. Merits-based review


Appellant says she "expressly seeks to narrow the scope of this appeal to the merits of the appealed order and the procedural irregularities that occurred." However, the scope of the appeal is not at issue here. The issue is whether Appellant should be able to file her appeal late. Respondents' Return appropriately addresses this issue. Again, Respondents' Return to Appellant's Motion to file out of time is not the proper medium by which to address the merits of Appellant's appeal.


5. Allegations of Improper Conduct

Appellant accuses Respondents' counsel in engaging in "direct ex parte communications with the presiding judge concerning substantive matters in this case." This is demonstrably false, which Appellant knows. She cites a November 6, 2025, 'Objection to ex parte Conduct' she filed in the underlying case as support for her unfounded claims of ex parte communication. Ex. 1.

Appellant's 'Objection' took issue with a November 6, 2025, email Respondents' counsel sent to Judge McCoy sending her a copy of a filed memorandum regarding a motion she was set to hear that afternoon. Of course, sending the presiding judge copies of material related to a hearing is common, and in fact, the court typically asks lawyers to send copies of material supporting their positions prior to a hearing.

Further, counsel for Respondents' copied Appellant on the email.

 **Andrew Countryman**
2025-11-06; Nelson v. Hunt, et al., C/A 2025-CP-10-03145
To: jmccoysc@sccourts.org, Cc: McCoy, Jennifer B. Law Clerk, Debra Nelson


Yesterday at 8:15 AM 
[Details](#)



Dear Judge McCoy,

I represent the Defendants in this case. You are set to hear Defendants' Motion to Strike Plaintiff's Affidavit of Service (along with several motions Plaintiff filed) this afternoon. My motion requests sanctions and a gatekeeper order. I attach a memo in support of that request. I copy Plaintiff (pro se) on this correspondence.

Respectfully,

Andy
Andrew Countryman
Countryman Law Firm
210 Wingo Way, Ste. 400
Mt. Pleasant, SC 29464
awc@countrymanlawfirm.com
843-253-4477
(f) 844-644-3165



 **2025-11-05 Sanctions memo.pdf** 

Ex parte communication means communication with a judge without the knowledge or presence of all parties. *See* Judicial Canon 3B(7), Rule 501, SCACR (defining ex parte as communications concerning a pending proceeding made outside the presence of the parties or their lawyers, except in limited circumstances such as administrative purposes where no party gains an advantage and all parties are promptly notified).

Counsel copied Appellant on the email to Judge McCoy, as well as Judge McCoy's law clerk. Appellant obviously received the email, as it was the basis of her Objection (and she has not alleged otherwise). There is no basis to claim the email was ex parte, and counsel rejects any allegation of ex parte or any other improper conduct. Respondents attach their response to Appellant's Objection as Ex. 2. This contains a complete response to and explanation of Appellant's baseless accusations of ex parte communications and improper conduct she references in the subject Motion to strike.

Notably, the Magistrate Court already rejected Appellant's prior attempts to characterize service of court documents as harassment in Nelson v. Countryman, C/A: 2025OR1011100036, which found no basis for a restraining order under S.C. Code § 16-3-1700. Ex. 3, Order.

The remainder of Appellant's arguments on this issue are essentially her complaints that the trial court did not handle certain motions filed in the underlying case in her chosen manner. Counsel for the Respondents has no control over what the lower court decided to hear or how it handled filed pleadings. Respondents' counsel rejects the accusations of "harassing conduct."

[remainder of page intentionally blank]

CONCLUSION

Therefore, Respondents respectfully request this Court deny Appellant's December 29, 2025, Motion to Strike.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Andrew W. Countryman", with a horizontal line underneath it.

Andrew W. Countryman
State Bar No. 72700
COUNTRYMAN LAW FIRM
210 Wingo Way, Ste. 400
Mt. Pleasant, SC 29464
843-253-4477
awc@countrymanlawfirm.com
Counsel for the Respondents

EXHIBIT 1

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON
IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

DEBRA NELSON)
)
 Plaintiff,)
)
 v.)
)
 BONNIE TRAVAGLIO HUNT, Esq.,)
 HUNT LAW LLC)
)
 Defendants.)

Civil Action No. 2025-CP-10-03145

CLERK OF COURT

2025 NOV -6 PM 12:34

NOTICE OF IMPROPER COMMUNICATION AND OBJECTION TO EX PARTE CONTACT

TO THE CLERK OF COURT AND CHIEF ADMINISTRATIVE JUDGE ROGER M. YOUNG Sr:

Plaintiff respectfully notifies the Court that on **November 6, 2025**, defense counsel **Andrew W. Countryman** sent an email message addressed directly to **Judge Jennifer B. McCoy**, with only Plaintiff and defense counsel included in the communication. No Clerk of Court, judicial assistant, or E-Filing system was copied.

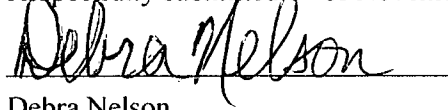
The email concerned substantive matters in this case and followed a prior similar communication on **November 5, 2025**, in which Mr. Countryman sent Judge McCoy a "Memorandum in Support of Request for Sanctions and Gatekeeper Order." Both communications occurred outside the standard filing channels and while Plaintiff's **Motion for Recusal (filed Oct. 14, 2025)** and **Notice of Appeal (filed Oct. 8, 2025)** remain pending.

This conduct appears to violate the prohibition against ex parte communications under **Rule 501, South Carolina Appellate Court Rules** and undermines confidence in the fairness and impartiality of the proceedings.

Plaintiff objects to any further communications of this nature and requests that:

1. The November 6, 2025 email be made part of the record.
2. The matter be referred to the **Chief Administrative Judge** for review.
3. No rulings be issued by Judge McCoy while recusal and appeal remain pending.

Respectfully submitted, 6th of November, 2025,



Debra Nelson
Pro Se Plaintiff
2718 Crestline Drive
North Charleston, SC 29405
843-277-4142
nelsondebra62@gmail.com

CERTIFICATE OF SERVICE

I, **Debra Nelson**, hereby certify that I have this day served a true and correct copy of the foregoing **Notice of Improper Communication and Objection to Ex Parte Contact** upon the following parties by **email** and **U.S. Mail**:

Andrew W. Countryman, Esq.
Countryman Law Firm
210 Wingo Way, Suite 400
Mount Pleasant, SC 29464
awc@countrymanlawfirm.com

Hon. Roger M. Young, Sr.
Chief Administrative Judge, Ninth Judicial Circuit (General Sessions)
100 Broad Street, Suite 368
Charleston, SC 29401
Email: ryoungsc@sccourts.org

Clerk of Court, Charleston County
Charleston County Judicial Center
100 Broad Street, Suite 106
Charleston, SC 29401
jarmstrong@charlestoncounty.org

Debra Nelson
Pro Se Plaintiff

EXHIBIT 2

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

Debra Nelson,

Plaintiff,

v.

Hunt Law, LLC and Bonnie Travaglio Hunt,
Esq.,

Defendants.

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
C/A NO.: 2025-CP-10-03145

**DEFENDANTS' RESPONSE TO
PLAINTIFF'S "NOTICE OF IMPROPER
COMMUNICATION AND OBJECTION
TO *EX PARTE* CONTACT**

The Defendants, by and through their undersigned counsel, submit this response to Plaintiff's November 7, 2025, "notice of improper communication and objection to *ex parte* contact." Plaintiff, *pro se*, has filed yet another frivolous pleading baselessly accusing defense counsel of improper conduct. This serves as further support for Defendants' request for sanctions and a gatekeeper order pending before this Court.

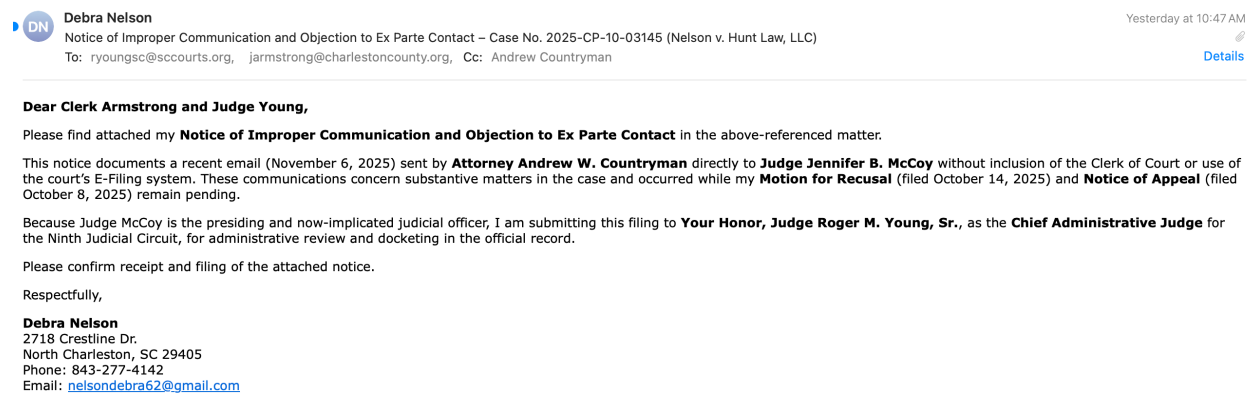
FACTS

1. The Court placed Defendants' motion to strike Plaintiff's affidavit of service on Judge McCoy's motions docket for the afternoon of November 6, 2025.
2. Defendants' motion seeks sanctions against Plaintiff for her frivolous, harassing, baseless, and abusive filings.
3. On November 5, 2025, defense counsel filed a memorandum in support of the request for sanctions in the motion to strike.

4. The morning of November 6, 2025, defense counsel sent a copy of the memorandum to Judge McCoy, copying her law clerk and Plaintiff. Here is the correspondence in its entirety:



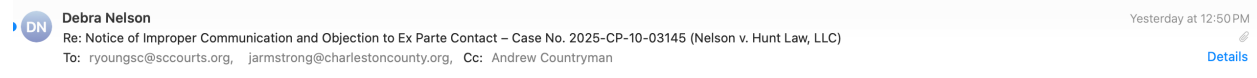
5. At 10:47 a.m. on November 6, 2025, Plaintiff sent an email to Judge Young¹ and Clerk of Court Julie Armstrong accusing defense counsel of impropriety with respect to the email that morning to Judge McCoy.



6. The email accused defense counsel of “*ex parte* contact” and complained that he did not include the Clerk of Court or use the court’s E-filing system.

¹ Plaintiff apparently sent the email to Judge Young on the mistaken belief he is the Chief Administrative Judge for the Ninth Circuit Court of Common Pleas. He is for General Sessions, but not Common Pleas. That is Judge McCoy.

7. At 12:50 p.m. on November 6, 2025, Plaintiff emailed Judge Young and Julie Armstrong again, stating:

 Debra Nelson
 Re: Notice of Improper Communication and Objection to Ex Parte Contact – Case No. 2025-CP-10-03145 (Nelson v. Hunt Law, LLC)
 To: ryoungsc@sccourts.org, jarmstrong@charlestoncounty.org, Cc: Andrew Countryman
 Yesterday at 12:50 PM
 Details

Attached is the Motion filed today 11/6/2025 by attorney Andrew Countryman that he planned to argue in the case scheduled for 11/6/2025. Judge Jennifer B. McCoy allowed attorney Countryman to do this at the hearing held on 7/31/2025. This is a pattern of misconduct by attorney Countryman that Judge McCoy has allowed

8. The email included a copy of the memorandum defense counsel filed the day prior and sent to Judge McCoy that morning. Plaintiff apparently mistook the memorandum for a motion and took issue with Judge McCoy considering it that day. Plaintiff also accused defense counsel of similar “misconduct” related to a hearing on July 31, 2025.

9. The Court canceled the hearing via email that afternoon.

PLAINTIFF’S ASSERTIONS

1. Defense counsel’s email of November 6, 2025, was not *ex parte* or improper.

Plaintiff says counsel’s email was *ex parte*. It was not. *Ex parte* communication means communication with a judge without the knowledge or presence of all parties. *See* Judicial Canon 3B(7), Rule 501, SCACR (defining *ex parte* as communications concerning a pending proceeding made outside the presence of the parties or their lawyers, except in limited circumstances such as administrative purposes where no party gains an advantage and all parties are promptly notified). Defense counsel copied Plaintiff on the email to Judge McCoy, as well as Judge McCoy’s law clerk. Plaintiff obviously received the email, as it was the basis of her complaint (and she has not alleged otherwise). There is no basis to claim the email was *ex parte*.

Plaintiff also claims defense counsel’s email was somehow improper because counsel did not copy the Clerk of Court or use the E-filing system. First, there is no requirement to copy the Clerk of Court on such an email, and it serves no practical purpose in this context. Second, the

memorandum sent to Judge McCoy in the email had been filed the prior day. There was nothing further to file. The email was simply sending Judge McCoy a courtesy copy of the memorandum in advance of the hearing set for that afternoon.

Moreover, the email contained no argument or substantive conversation. It merely told Judge McCoy counsel was sending a memorandum regarding a motion she was set to hear that afternoon. The email also confirmed counsel copied Plaintiff and attached a copy of the memorandum filed the prior day.

Plaintiff's notice says defense counsel sent Judge McCoy a similar communication on November 5th. This is not true, nor has Plaintiff produced any such correspondence. Counsel filed the memorandum on November 5th and sent it to Judge McCoy (copying Plaintiff) the following morning. Plaintiff's reference to "both communications" is flatly wrong. Regardless, there was nothing improper whatsoever about the single correspondence defense counsel sent.

Plaintiff also takes issue with the communication occurring "while the Plaintiff's Motion for Recusal and Notice of Appeal remain pending." This is of no consequence. The Court set Defendants' Motion to Strike for a hearing, which was not canceled until yesterday afternoon shortly before the scheduled hearing. When defense counsel sent the email to Judge McCoy, the hearing was scheduled to proceed. Whether the Court chooses to hear a motion is out of defense counsel's control, and he is obligated to represent his client accordingly. Regardless, nothing about any filings Plaintiff made, makes, or could make would render defense counsel's email sending Judge McCoy a copy of a brief improper.

2. Difference between a motion and supporting memoranda

Plaintiff's recent emails to the Court also baselessly accuse defense counsel and Judge McCoy of impropriety with respect to the canceled hearing yesterday and a hearing that took place on July 31, 2025. Plaintiff's issue appears to stem from her failure to understand the difference between a motion and a supporting memorandum.

Judge McCoy heard various motions in this case on July 31, 2025, including Defendants' Motion to Dismiss. Defense counsel filed a memorandum in support of the motion to dismiss on July 31st prior to the hearing. Plaintiff served Defendant via mail and hand delivery at the hearing. There is nothing precluding the Court from considering a memorandum in support of a previously filed motion presented at or prior to a hearing. In fact, this is common practice.

Plaintiff makes the same mistake with respect to the November 5, 2025, memorandum. Again, there is nothing at all precluding a lawyer from filing a brief in support of a motion at or prior to a hearing. Further, defense counsel properly served Plaintiff and sent her a copy by email prior to the hearing.

3. Plaintiff's 'notice' is actually a motion and should not be considered.

Plaintiff's pleading styled as a 'notice' seeks specific relief. The proper method by which to seek relief is via a filed motion. This results in a hearing where both sides can present to the court. By styling this as a 'notice' rather than a motion, Plaintiff seeks relief without affording Defendants a hearing, in violation of SCRCF Rule 7(b) (requiring motions to state grounds and relief sought) and due process principles. Plaintiff's filing is an attempt to bypass this procedure and obtain certain relief without challenge. This is improper, and the Court should not consider it.

CONCLUSION

Plaintiff's notice is yet another meritless filing intended to delay proceedings and harass defense counsel and is consistent with the pattern detailed in Defendants' memorandum in support for their request for sanctions. The Court should reject such tactics and consider them in evaluating the request for sanctions and a gatekeeper order.

Respectfully submitted,



By: _____

Andrew W. Countryman
COUNTRYMAN LAW FIRM
State Bar No.: 72700
210 Wingo Way, Suite 400
Mount Pleasant, SC 29464
843-253-4477
awc@countrymanlawfirm.com
sgc@countrymanlawfirm.com
Lawyer for the Defendants

CERTIFICATE OF SERVICE

I certify that immediately upon acceptance by the court of this pleading as filed, I will immediately serve a copy of the same on Plaintiff via US Mail addressed as follows:

Debra Nelson
2718 Crestline Dr.
N. Charleston, SC 29405
Plaintiff (pro se)



Andrew W. Countryman
Nov. 7, 2025
Mt. Pleasant, SC

EXHIBIT 3

2025OR1011100036

CASE NUMBER(S)

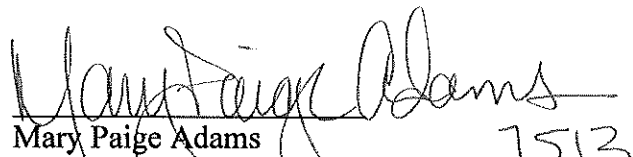
STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
Debra Nelson,)
 Plaintiff)
 VS.)
)
Andrew W. Countryman, Esq.,)
 Defendant)

IN THE SUMMARY COURT

ORDER

After filing of a complaint and motion for a Restraining Order on September 22, 2025, the Court held a hearing on October 7, 2025, before Judge Mary Paige Adams. After hearing the evidence, and examining the affidavits and verified pleadings, and reviewing all admissible evidence, the Court has determined that the Plaintiff has not proven by a preponderance of evidence a violation SCCA §16-3-1700. Therefore, there is no need for issuance of a Restraining Order pursuant to SCCA §16-3-1700.

It is so **ORDERED**, this 8th day of October, 2025.


Mary Paige Adams
Charleston County Magistrate Court Judge 7513

2025OR10111100036

MAGISTRATE CASE NUMBER

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
Debra Nelson,)
Plaintiff)
VS.)
)
Andrew W. Countryman,)
Defendant)

IN THE MAGISTRATE COURT

FILED IN CHARLESTON COUNTY

OCT 08 2025

EAST COOPER MAGISTRATE'S COURT

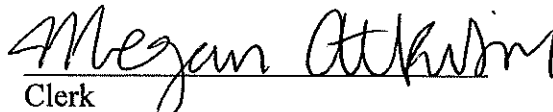
CERTIFICATE OF SERVICE

Pursuant to Magistrate Court Rule 8, on the 8th day of October 2025, the parties have been served a copy of this Order at their last known address and by electronic mail.

Debra Nelson
2718 Crestline Drive
North Charleston, SC 29405
843-277-4142
Nelsondebrab2@gmail.com

Andrew W. Countryman
Countryman Law Firm
210 Wingo Way Ste. 400
Mount Pleasant, SC 29464
843-253-447
awc@countrymanlawfirm.com

This 8th day of October 2025.


Clerk
Charleston County Summary Court

RECEIVED

Dec 29 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No: 2025-002408

Debra Nelson, Appellant,

v.

Hunt Law, LLC and
Bonnie Travaglio Hunt, Esq., Respondents.

PROOF OF SERVICE

I certify this day, December 29, 2025, I served Respondents' Return to Appellant's 'Motion to strike improper and irrelevant allegations and to limit argument to the merits' on Appellant, *pro se*, by depositing a copy in the United States Mail, postage prepaid addressed as follows:

Debra Nelson
2718 Crestline Dr.
N. Charleston, SC 29405
Appellant, *pro se*

[Signature page to follow]



Andrew W. Countryman
State Bar No. 72700
COUNTRYMAN LAW FIRM
210 Wingo Way, Ste. 400
Mt. Pleasant, SC 29464
843-253-4477
awc@countrymanlawfirm.com
Counsel for the Respondents