

MOTION TO ADD NEW EVIDENCE
HOLDER PROPERTIES
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Daniel Coble, Circuit Court Judge

Appellant Case No. 2024-001242
Case No. 2023-CP-400-4408

RECEIVED
JAN 22 2026
SC Court of Appeals

Kamarah Reynolds-Hall

Appellant,

v.

**Jammie Robinson, John Dixon,
Dominic Hill, Joseph Hunter, Anthony
(AJ) Lawson, Javon Benson, Jahmar
Brown, Cincere Scott, Jasmine
Alexander-Coleman, Holder
Properties, University of South
Carolina, Defendants,**

Respondents.

**University of South Carolina
Holder Properties**

MOTION TO ADD NEW EVIDENCE

Appellant comes now to ask the Honorable Court for a Motion To Add New Evidence of Nicole Martin, Adam Sonenshine affidavit and Claims.

Appellant says Nicole Martin is the new evidence that was discovered after the hearing. The evidence could not have been discovered and produced at the trial with reasonable diligence.

The Rules of Civil Procedure are designed to ensure that both parties go to trial knowing what all evidence exists, rather than being sandbag by the opposing side by that with holds information and evidence.

The Judge ruled that Service of Process was not met and it was grounds to dismiss.

The Judge ruled the case was without prejudice.

Validity of Service. Failure to make proof of service does not affect the validity of the service

The New Evidence is of **Nicole Martin a Property Manager** hired by Respondent with a start date of **Oct 2, 2023**.

Nicole Martin was working her last week as a Property Manager at CMM Realty **Sept 25-29, 2023**.

Suppression and Concealment.

The Respondent intentionally suppressed and concealed Nicole Martin actions from being discovered. This information would have affected the trial outcome of the newly discovered evidence that was concealed from the appellant.

Rule 26 (a) (1) (A) Initial Disclosure of Nicole Martin Nicole Martin.

The Respondent is required to provide name and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims and defenses.

1. Nicole Martin was not disclosed as required by **Rule 26 (a) (1) (A) Initial Disclosure**
2. Adam Sonenshine hired Nicole Martin to be a Property Manager with Holder Properties with a start date of OCT 2, 2023.
3. **Adam Sonenshine affidavit** was not disclosed. It was presented the night before the hearing during after hour.

Nicole Martin violated the US Postal Laws

Federal laws protect mail delivery by criminalizing obstruction, theft, and tampering, primarily under Title 18 U.S. Code (e.g., 18 USC § 1701, § 1703, § 1708), making it illegal to delay, destroy, or steal mail, even by private citizens; while USPS sets operational rules (like receptacle access) and laws like the Postal Accountability Act manage service, federal statutes broadly safeguard mail as a public trust and service.

US Postal Laws prohibits the opening of mail not ADDRESSED TO THEM. There is no way possible anyone would know the contents unless illegally opening the certified mail that contained the Summons and Complaint

SERVICE OF PROCESS-Interrupted by Nicole Martin and Adam Sonenshine

Adam Sonenshine hired Nicole Martin

Nicole Martin violated the US Postal Laws

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office. 18 U.S.C.A Code § 1703 (b) Opening, destroying, or detaining mail without authority).

Nicole Martin and Holder Properties was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office. 18 U.S.C.A Code § 1703 (b) Opening, destroying, or detaining mail without authority).

Nicole Martin is the key person that is directly involved with interrupting the Service of Process.

1. Nikole Martin was hired as Property Manager by **Holder Properties with a start date of October 2, 2023.**
2. Nicole Martin was employed with **CMM Realty for 8 years 3 months. Property Manager-September 2015 to September 29, 2023.**
3. Brittany Blantz and Nicole Martin both shared an office for the respondent in Columbia, Carolina. They are both property managers as general agents for Holder Properties.

Holder Properties concealed the knowledge of the Summons and Complaint and suppressed and concealed the possession of the Summons and Complaint for a total of 261 days of 365 days in a year.

Legal Error of Law

- 1. Due Process-Concealment.** Knowingly concealing evidence violated the right to a fair trial.
- 2.** Courts generally prefer to re-solve cases based on their actual merits rather than technicalities such as improper service. **The courts will allow an plaintiff another opportunity to correct the service before dismissing.**
- 3.** Disregarding established legal principles from past similar cases.

However, "[p]ro se litigants are allowed more latitude than litigants represented by counsel to correct defects in service of process and pleadings," Moore v. Agency for Int'l Dev., 994 F.2d 874, 876 (D.C.Cir. 1993).

- 4. Rule 26 of the South Carolina Rules of Civil Procedure (SCRCP)** is the foundational rule governing the **scope and limits of discovery** in civil cases. It determines what information parties can obtain from each other and establishes protections for sensitive materials.
- 5. Rule 26 (a) (1) (A) Initial Disclosures**
- 6. Rule 26 (a) (2) (a) Disclosure of Expert Testimony**
Affidavit. Adam Sonenshine affidavit should have been excluded.
- 7. (SCACR) Rule 613 of the Supreme Court.** A self-represented litigant must provide written authorization to be served by email.
- 8. Suppression and Concealment.**
The Respondent intentionally suppressed and concealed **Nicole Martin** actions from being discovered. This information would have affected the trial outcome of the newly discovered evidence that was concealed from the appellant.

PROCEDURAL ERRORS

1. **Rule 26 of the South Carolina Rules of Civil Procedure (SCRCP)** is the foundational rule governing the **scope and limits of discovery** in civil cases. It determines what information parties can obtain from each other and establishes protections for sensitive materials.

2. **Rule 26 (a) (1) (A) Initial Disclosures**

3. **Rule 26 (a) (2) (a) Disclosure of Expert Testimony**

Affidavit. Adam Sonenshine affidavit should have been excluded.

4. **(SCACR) Rule 613 of the Supreme Court.** A self-represented litigant must provide written authorization to be served by email.

5. The court should have **granted a second hearing** to allow the appellant to investigate the affidavit of Adam Sonenshine.

6. Courts generally prefer to re-solve cases based on their actual merits rather than technicalities such as improper service. **The courts will allow an plaintiff another opportunity to correct the service before dismissing.**

7. **The Judge should have allowed** the plaintiff an opportunity to correct the service before dismissing.

8. The appellant had **25 days** that remained before the Statute of Limitation was set to expire to send another Summons and Complaint so the trial could advance.

9. The Judge ruled the case of Respondent was **without prejudice.**

The Appeals Court should **remand the case back to the lower court** for further action to address the newly discovered evidence in the lower court decision.

SERVICE OF PROCESS-Nicole Martin

Courts generally prefer to re-solve cases based on their actual merits rather than technicalities such as improper service. The courts will allow an plaintiff another opportunity to correct the service before dismissing. **However, "[p]ro se litigants are allowed more latitude than litigants represented by counsel to correct defects in service of process and pleadings," Moore v. Agency for Int'l Dev., 994 F.2d 874, 876 (D.C.Cir. 1993).**

The newly discovered evidence of **Nicole Martin** is important because her actions impacted the Service of Process and would have changed the outcome of the hearing if known.

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

1. Interrupt the Proper Service
2. Federal Laws will be violated
 - 18 U.S. Code § 1701 - Obstruction of the mail**
 - 18 U.S. Code § 1702 - Obstruction of correspondence**
 - 18 U.S.C. § 1703(b) (opening, destroying, or detaining mail without authority)**

October 2, 2023. Nicole Martin started her new job at Holder Properties with a start date of October 2, 2023. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties was in possession of the Summons and Complaint for a **total of 261 days of 365 days in a year.** The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

The affidavit of Adam Sonenshine should not have been admitted. The appellant was not given a chance to review the witness statement.

The Respondant attorney didn't have an agreement to serve the plaintiff by email. *SCACR Rule 613 of the Supreme Court*

Adam Sonenshine hired Nicole Martin to be a Property Manager while she worked her last week at CMM Realty.

Nicole Martin last work week was September Sept 25-29, 2023 with CMM Realty and starting her new job as a Property Manager with the Respondent.

October 2, 2023. Nicole Martin began employment with the respondent the following week.

Nicole Martin is directly responsible for interrupting the delivery of the Summons and Complaint.

Nicole Martin was hired as Property Manager by **Holder Properties with a start date of October 2, 2023.**

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023.

Holder Properties was in possession of the Summons and Complaint for a **total of 261 days of 365 days in a year.** The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Suppression and Concealment. The Respondent intentionally suppressed and concealed Nicole Martin actions from being discovered. This information would have affected the trial outcome of the newly discovered evidence that was concealed from the appellant. This is a violation of the obligation to disclose.

NICOLE MARTIN

US Postal Laws prohibits the opening of mail not **ADDRESSED TO THEM**. There is no way possible anyone would no the contents unless illegally opening the certified mail that contained the Summons and Complaint

Holder Properties concealed the knowledge of the Summons and Complaint and held it for was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year.

Nicole Martin is the key person that is directly involved with interrupting the Service of Process.

1. Nikole Martin was hired as Property Manager by **Holder Properties with a start date of October 2, 2023.**
2. Nicole Martin was employed with **CMM Realty for 8 years 3 months. Property Manager-September 2015 to September 29, 2023.**
3. **Nicole Martin opened the certified mail that contained the Summons and Complaint** had a duty by law to return the certified mail that contained the summons and complaint to the post office.

18 U.S. Code § 1701 - Obstruction of the mail

18U.S. Code § 1702 - Obstruction of correspondence

18 U.S.C. § 1703(b) (opening, destroying, or detaining mail without authority)

PROPER SERVICE WAS INTERRUPTED-NICOLE MARTIN

Nicole Martin interrupted the **PROPER SERVICE** by opening the certified envelope that contained the Summons and Complaint. **HOLDER PROPERTIES.**

Holder Properties concealed the knowledge of the Summons and Complaint and held it for was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year.

Nicole Martin violated Federal Laws

18 U.S. Code § 1701 - Obstruction of the mail

18 U.S. Code § 1702 - Obstruction of correspondence

18 U.S.C. § 1703(b) (opening, destroying, or detaining mail without authority)

SERVICE WAS EFFECTED

26 U.S.C. § 7502(f)(2). Service is effective upon the date of delivery as shown in the delivery record of the commercial delivery service.

Service is effective upon the date of delivery as shown on the return receipt.

NICOLE MARTIN and BRITTANY BLANTZ SHARED THE SAME OFFICE WITH FOR HOLDER PROPERTIES

Nicole Martin is the key person that is directly involved with interrupting the Service of Process.

4. Nikole Martin was hired as Property Manager by **Holder Properties with a start date of October 2, 2023.**
5. Nicole Martin was employed with **CMM Realty for 8 years 3 months. Property Manager-September 2015 to September 29, 2023.**
6. Brittany Blantz and Nicole Martin both shared an office for the respondent in Columbia, Carolina. They are both property managers as general agents for Holder Properties.

Holder Properties concealed the knowledge of the Summons and Complaint and suppressed and concealed the possession of the Summons and Complaint for a total of 261 days of 365 days in a year.

NICOLE MARTIN HOLDER PROPERTIES FALSE CLAIMS

CMM Realty is not a defendant in the lawsuit.

Claim 1. How they were served? Summons and Complaint

It is against the law to keep a package that does not belong to you, it could be considered a form of theft, regardless of the delivery error.

US Postal Laws prohibits the opening of mail not ADDRESSED TO THEM. There is no way possible anyone would know the contents unless illegally opening the certified mail that contained the Summons and Complaint

Nicole Martin is the key person that is directly involved with interrupting the **Service of Process**.

1. Nikole Martin was hired as Property Manager by **Holder Properties with a start date of October 2, 2023.**
2. Nicole Martin was employed with **CMM Realty for 8 years 3 months Property Manager-September 2015 to September 29, 2023**

Summons and Complaint listed Holder Properties as intended recipient not CMM Realty.

1. **September 25, 2023 thru September 29, 2023.**

Nicole Martin opened the certified mail addressed to HOLDER PROPERTIES that contained the Summons and Complaint.

Nicole Martin had a duty by law to return the certified mail that contained the summons and complaint to the post office. 18 U.S.C.A Code § 1703 (b) Opening, destroying, or detaining mail without authority)

Nicole Martin started the new job at Holder Properties with a start date of October 2, 2023. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

PS FORM 3811: Shows the date effected.

The PS Form 3811 has 2 areas that will show who the addressee listed as the intended recipient for the certified mail that contained the summons and complaint.

Holder Properties was in possession of the Summons and Complaint for a **total of 261 days of 365 days in a year**. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Service was Effected

Service is effective upon the date of delivery as shown on the return receipt.

26 U.S.C. § 7502(f)(2). Service is effective upon the date of delivery as shown in the delivery record of the commercial delivery service.

Claim 2. The respondent claims there is no proof they have been served.

Summons and Complaint listed Holder Properties as intended recipient not CMM Realty.

- 1. September 25, 2023 thru September 29, 2023.**
- 2. October 2, 2023. Nicole Martin was hired as Property Manager by Holder Properties with a start date of October 2, 2023.**

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

18 U.S. Code § 1701 - Obstruction of the mail

18 U.S. Code § 1702 - Obstruction of correspondence

18 U.S.C. § 1703(b) (opening, destroying, or detaining mail without authority)

October 2, 2023@Started work at Holder Properties

Nicole Martin was hired as Property Manager by Holder Properties with a start date of October 2, 2023.

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023

Holder Properties was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties is in direct violations of Federal Laws by claiming they didn't like the way the Summons and Complaint was received.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023. Holder Properties was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Claim 3. The respondent claimed there was no registered agent authorized to sign for the certified mail that contained the summons and complaint at CMM Realty.

US Postal Laws prohibits the opening of mail not ADDRESSED TO THEM.

There is no way possible anyone would know the contents unless illegally opening the certified mail that contained the Summons and Complaint.

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Nicole Martin was hired as Property Manager by Holder Properties with a start date of October 2, 2023.

October 2, 2023@Started work at Holder Properties

Due Process was violated when Holder Properties did not return the opened certified mail back to the post office to be sent back to the sender which is the appellant.

Nicole Martin was hired as Property Manager by Holder Properties with a start date of October 2, 2023.

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023

Holder Properties was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties is in direct violations of Federal Laws by claiming they didn't like the way the Summons and Complaint was received.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023. Holder Properties was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Claim 4. The respondent claim suggested that the wrong property management company was served.

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

October 2, 2023. Nicole Martin started her new job at Holder Properties with a start date of October 2, 2023. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

October 2, 2023@Started work at Holder Properties

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It is against the law to keeping a package that does not belong to you could be considered a form of theft, regardless of the delivery error.

Nicole Martin last week at CMM Realty. September 25, 2023 thru September 29, 2023.

October 2, 2023. Nicole Martin started her new job at Holder Properties with a start date of October 2, 2023. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year.

Under U.S. Law, the original recipient is the rightful owner of the package.

The USPS has a clear process for return of mail that doesn't list you as the recipient and what should occur.

For mail that has never been opened, The US Postal Service has rules to return back to the Post Office.

- Write "Return to Sender" or "Not at This Address" clearly
- Mark it on the front of the envelope
- Don't cover the original address
- Put it back in the mailbox or take it to the post office

For mail opened by mistake, They are legally required to follow these steps:

1. Don't read it.
2. Put it in a new envelope
3. Add the right postage
4. Write clear return instructions

US Postal Laws prohibits the opening of mail not ADDRESSED TO THEM. There is no way possible anyone would no the contents unless illegally opening the certified mail that contained the Summons and Complaint

October 2, 2023. Nicole Martin started her new job at Holder Properties with a start date of October 2, 2023.The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties concealed the knowledge of the Summons and Complaint and held it for was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year.

NICOLE MARTIN

AFFADAVIT OF ADAM SONENSHINE

Affidavit of Adam Sonenshine Filing 07/08/2024-20:59

The appellant was put at a disadvantage.

The appellant states the **affidavit by Adam Sonenshine should not have been admitted by the court at the last minute.**

American Bar Association

ABA Rule 4.1-Truthfulness in statements

ABA Rule 4.2-Misconduct. Maintaining the integrity of the profession

ABA Rule 4.1-Truthfulness in statements

Adam Sonenshine, the chief operating officer and general counsel for Respondent, averred that Holder Properties, Inc has never been served with the lawsuit.

Adam Sonenshine, statement that he averred that Holder Properties had never been served with the lawsuit goes against **ABA Rule 4.1** and **ABA Rule 4.2**.

The statement on the affidavit is not true.

Summons and Complaint listed Holder Properties as intended recipient not CMM Realty.

- 3. September 25, 2023 thru September 29, 2023.**
- 4. October 2, 2023.** Nicole Martin was hired to be Property Manager by Holder Properties with a start date of October 2, 2023.

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

18 U.S. Code § 1701 - Obstruction of the mail

19 U.S. Code § 1702 - Obstruction of correspondence

18 U.S.C. § 1703(b) (opening, destroying, or detaining mail without authority)

October 2, 2023@Started work at Holder Properties

Nicole Martin was hired as Property Manager by Holder Properties with a start date of October 2, 2023.

October 2, 2023. Nicole Martin and Brittany Blantz each worked for Holder Properties

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023.

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Holder Properties is in direct violations of Federal Laws by claiming they didn't like the way the Summons and Complaint was received.

Holder Properties should have returned the Summons and Complaint when Nicole Martin started work on October 2, 2023. **Holder Properties** was in possession of the Summons and Complaint for a **total of 261 days of 365 days in a year**. The Respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.

September 29, 2023. Nicole Martin last day at CMM Realty.

October 2, 2023. Nicole Martin employment start date for the respondent.

October 2, 2023 to July 2024. Nicole Martin and Brittany Blantz shared the same office as property managers:

October 18, 2023. The respondent filed a motion to dismiss for insufficient service of process

NICOLE MARTIN

NICOLE MARTIN worked in the same office with Brittany McJunkin when the Summons and Complaint arrived at CMM Realty

DEFAULT JUDGEMENT Rule 55(c) or Rule 60(b)

Any such default or judgment by default shall be set aside pursuant to **Rule 55(c) or Rule 60(b)** if the defendant demonstrates to the court that the return receipt was signed by an unauthorized person.

A failure to forward a summons and complaint after receiving it does not constitute inadvertence or excusable neglect sufficient to put aside a default judgment.

Sundown Operating Co. The first task of a litigant who seeks for his default to be set aside is to provide a sufficient explanation for why he did not timely plead and must also provide reasons why letting him out of default would serve the interests of justice. *Roche v. Young Bros. of Florence, 318 SC 207,210-12, 456 SE2d. 897, 899-901 (1995)*

NICOLE MARTIN worked in the same office and opened the mail only

Brittany McJunkin inadvertently signed for the unopened certified mail that contained the summons and complaint. A failure to forward a summons and complaint after receiving it does not constitute inadvertence or excusable neglect sufficient to put aside a default judgment.

Nicole Martin last week at CMM Realty. **September 25, 2023 thru September 29, 2023.**

US Postal Laws prohibits the opening of mail not ADDRESSED TO THEM. There is no way possible anyone would know the contents unless it was illegally opening the certified mail that contained the Summons and Complaint

Nicole Martin opened the certified mail that contained the Summons and Complaint had a duty by law to return the certified mail that contained the summons and complaint to the post office.

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Holder Properties concealed the knowledge of the Summons and Complaint and held it for was in possession of the Summons and Complaint for a total of 261 days of 365 days in a year.

The Rules of Civil Procedure are designed to ensure that both parties go to trial knowing what all evidence exists, rather than being sandbag by the opposing side by that with holds information and evidence.

The Respondent intentionally concealed the name of **Nicole Martin** from being discovered and would have affected the trial outcome.

The evidence was discovered after the hearing and could not have been discovered and produced at the trial with **reasonable diligence**.

The newly discovered evidence of **Nicole Martin direct involvement** of the interruption of **Service of Process** with Holder Properties is grounds for a new trial.

The newly discovered evidence of the **Suppression and Concealment** of Nicole Martin is grounds for a new trial.

Appellant prays for the following

1. A reversal of the lower court ruling of **Insufficient Service of Process**.
2. For Honorable Court to **allow the new Evidence identifying Nicole Martin** who is central to the lawsuit.
3. For Honorable Court to rule that Adam Sonenshine affidavit should not have been admitted at hearing at the last minute.
4. For the Honorable Court to send the case back to lower court because it was **dismissed without prejudice**.
5. For the Honorable Court to send the case back to lower court because **the appellate had 25 days to resend the Summons and Complaint**.
6. For the Honorable Court to see that **Procedural Errors** happened during the hearing to send the case back to lower court.
7. For the Honorable Court to see that **Legal Errors** happened during the hearing to send the case back to lower court.
8. For the Honorable Court to send the case back to lower court because a **second hearing should have been granted**.
9. For the Honorable Court to send the case back to the lower court because **the Statute of Limitations was not expired**.
10. For a court order granting **Default Judgement to the appellant in the amount of \$300,000.00**.

For the Appeals Court to **remand the case back to the lower court** for further action to address the newly discovered evidence in the lower court decision.

January 22, 2026



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PRO SE

FORM 7
MOTION TO ADD NEW EVIDENCE
HOLDER PROPERTIES

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

RECEIVED
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SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Daniel Coble, Circuit Court Judge

Appellant Case No. 2024-001242
Case No. 2023-CP-400-4408

University of South Carolina
Holder Properties

Respondents,

v.

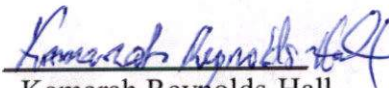
Kamarah Reynolds-Hall

Appellant.

PROOF OF SERVICE

I certify that I have served the **Motion To Add New Evidence** by depositing a copy of it in the United States Mail, postage prepaid, on January 22, 2026, and addressed to the attorneys of record for **University of South Carolina** David DeMasters PO Box 11412 Columbia, South Carolina 29211. Damon Wlodarczyk PO Box 12009 Columbia, South Carolina 29211 and the attorneys of record for **Holder Properties** Catherine Garbee Griffin PO Box 8057 Columbia, South Carolina 29202 by personally mailing a copy to the attorney of record.

January 22, 2026


Kamarah Reynolds-Hall
5 Alatera Court
Columbia, South Carolina 29229
(803) 237-6057
Pro Se