

MOTION TO ADD NEW EVIDENCE-AMENDMENT
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

FEB 20 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-AMENDMENT

Appellant comes now to ask the Honorable Court for a **Motion to Add New Evidence-Amendment** that is Material.

Appellant acted with reasonable diligence to learn of the **concealment of Nicole Martin** that was not discoverable during the lower Court Trial.

Appellant states that concealed evidence used to win a civil case **is a serious matter and is often classified as fraudulent concealment or fraud upon the court.**

Appellant states the concealment is egregious and **the Appellate Court should sanction Holder Properties Attorney Adam Sonenshine and Catherine Griffin. The attorneys must be reported to the South Carolina Attorney Bar.**

Appellant states **the Appellate Court should prohibit Holder Properties** from contesting the Newly Discovered Evidence

Materiality

Appellant states that the new evidence has **Materiality:**

The hidden evidence was crucial, the result of discovering this evidence meaning would likely have changed the trial's outcome.

Appellant wants the Appellate Court to **apply the Newly Discovered" Evidence Rule.**

Appellant wants the Appellate Courts **to weigh the evidence** that was not previously known or discoverable.

Appellant wants the Appellate Courts to rule that the hidden evidence caused a miscarriage of justice and to remand the case for a new trial

1. Vacate the original judgment.

Appellant states **the concealment is grounds for an appeal** based on fraud to deceive the lower court and the Appellate Court with the submission of the Affidavit that was not legally examined in accordance with **Rule 613, SCACR (Service by Electronic Means in the Trial Courts)**, self-represented (pro se) litigants must consent in writing to be served by email. Lawyers may serve other lawyers via email using the address in the Attorney Information System (AIS).

South Carolina Rules of Civil Procedure (SCRPC)

Appellant states Holder Properties violated Rule 26 of the South Carolina Rules of Civil Procedure (SCRPC) that lays out the foundational rule governing the **scope and limits of discovery** in civil cases.

Rule 26 (a) (1) (A) Initial Disclosures

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**

Rule 26 (a) (2) (a) Disclosure of Expert Testimony

- a. **Affidavit.** Adam Sonenshine affidavit should have been excluded.
- b. Adam Sonenshine hired Nicole Martin to be a Property Manager with Holder Properties with a start date of OCT 2, 2023.
- c. **Adam Sonenshine affidavit** was not disclosed. It was presented the night before the hearing during after hour.

Suppression and Concealment-NICOLE MARTIN

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.

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

1. Nicole Martin
2. Adam Sonenshine and Nicole Martin

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**.

NICOLE MARTIN

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

1. Nicole 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)

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.

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.

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)

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).**

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 and BRITTANY BLANTZ

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.

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.

(SCACR) Rule 613 of the Supreme Court

Under South Carolina Supreme Court Order 2022-05-06-04, which outlines Rule 613, SCACR (Service by Electronic Means in the Trial Courts), self-represented (pro se) litigants must consent in writing to be served by email. Lawyers may serve other lawyers via email using the address in the Attorney Information System (AIS).

Key requirements for email service under Rule 613 include:

- **Self-Represented Litigants:** Must provide written consent to receive service via email, including the specific email address to be used.

Affidavit:

Affidavit by Adam Sonenshine and Catherine Griffin the attorney for Holder Properties
Appellant states the Misconduct by Adam Sonenshine and Catherine Griffin go against the **American Bar Association**.

1. Adam Sonenshine
2. Christine Griffin Rule 613, SCACR (Service by Electronic Means in the Trial Courts), self-represented (pro se) litigants must consent in writing to be served by email.

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

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.

- 1. September 25, 2023 thru September 29, 2023.**
- 2. 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.

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.

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
CLAIMS THAT HOLDER WAS CONCEALING
THE SUMMONS AND COMPLAINT**

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.

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.

- 3. September 25, 2023 thru September 29, 2023.**
- 4. 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

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

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.

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.

USPS has a clear process for return of mail

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

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)*

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.**

Holder Properties did not SERVE ANSWER TO APPELLANT as required therefore causing a DEFAULT JUDGEMENT.

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

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means: Kamarah Reynolds Hall.

Appellant was never served.

Holder Properties filed a Certificate of Service and never served the Appellant an answer.

Please see attachment

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.

Conclusion

Appellant states that concealed evidence to win a civil case **is a serious matter and is often classified as fraudulent concealment or fraud upon the court.**

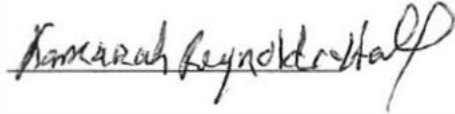
Appellant states the concealment is egregious and the Appellate Court should sanction the Holder Properties Attorney Adam Sonenshine and Catherine Griffin. The attorneys must be reported to the South Carolina Attorney Bar.

Appellant states the Appellate Court should prohibit Holder Properties from contesting the **Newly Discovered Evidence.**

Appellant prays for the following

1. A reversal of the lower court ruling of **Insufficient Service of Process.**
2. For the Honorable Court to remand the case back to lower court because it was **dismissed without prejudice.**
3. For Honorable Court to **allow the new Evidence identifying Nicole Martin** as central to the lawsuit.
4. For Honorable Court to rule that **Adam Sonenshine affidavit** should not have been admitted at hearing at the last minute and should be remanded back to the lower court.
5. For the Honorable Court to see that **Procedural Errors** happened during the hearing to send the case back to lower court.
6. For the Honorable Court to see that **Legal Errors** happened during the hearing to send the case back to lower court.
7. For the Honorable Court to remand the case back to lower court because **the appellate had 25 days to resend the Summons and Complaint.**
8. For the Honorable Court to remand the case back to lower court because a **second hearing should have been granted.**
9. For the Honorable Court to remand 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.**

Feb 20 2026



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Columbia, South Carolina 29202
803-799-9091

Attorney for Holder Properties

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Columbia, South Carolina 29205
803-799-9993

Attorney for University of South Carolina

Damon Christian Wlodarczyk
PO Box 12009
Columbia, South Carolina 29211

Attorney for University of South Carolina

Kamarah Reynolds-Hall
5 Alatera Court
Columbia, South Carolina 29229
803-237-6057

PRO SE

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP4004408

Official File Stamp: 10-19-2023 08:24:48 AM

Court: CIRCUIT COURT

Common Pleas

Richland

Case Caption: Kamarah Reynolds Hall vs Jammie Robinson ,
defendant, et al

Document(s) Submitted: Service/Certificate Of Service

Filed by or on behalf of: Catharine Garbee Griffin

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Catharine Garbee Griffin for Holder Properties

Damon Christian Wlodarczyk for University of
South Carolina

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Cincere Scott

Jahmar Brown

Javon Benson

Anthony Randolph Lawson

Joseph Hunter

Kamarah Reynolds Hall for Kamarah Reynolds
Hall

Dominic Hill

John Dixon

Jammie Robinson

Reynolds Hall, Kamarah	Motion In Limine For Tortious Conduct	Motion		05/16/2024-16:30		
Reynolds Hall, Kamarah	Obnibus Motion Integrity of Investigation	Motion		05/16/2024-16:30		
Reynolds Hall, Kamarah	Motion To Allow Travis Hall To Speak In All Hearings	Motion		03/21/2024-16:03		
Reynolds Hall, Kamarah	Certificate Of Service	Filing		03/21/2024-16:01		
Reynolds Hall, Kamarah	ADR/Alternative Dispute Resolution (Workflow)	Action		03/19/2024-13:35	11/19/2024-13:35	
University of South Carolina	NEF(01-03-2024 03:28:15 PM) Notice/Notice of Appearance	Filing		01/03/2024-15:28		
University of South Carolina	Notice/Notice of Appearance	Filing		01/03/2024-15:28		
Reynolds Hall, Kamarah	Notice of Motion	Filing		11/14/2023-11:54		
Reynolds Hall, Kamarah	Motion/Statute of Limitation Is Not Time Barred	Motion		11/13/2023-16:44	11/13/2023-16:48	
Reynolds Hall, Kamarah	Motion To Deny Motion to Dismiss of University of SC	Motion		11/01/2023-14:33	11/01/2023-14:33	
Reynolds Hall, Kamarah	Certificate Of Service	Filing		11/01/2023-14:32		
Reynolds Hall, Kamarah	Certificate Of Service	Filing		11/01/2023-14:31		
Reynolds Hall, Kamarah	Motion To Deny Motion To Dismiss	Motion		11/01/2023-14:31	11/01/2023-14:26	
Holder Properties	NEF(10-19-2023 08:24:48 AM) Service/Certificate Of Servi...	Filing		10/19/2023-08:44		
Holder Properties	Service/Certificate Of Service	Filing		10/19/2023-08:24		
Holder Properties	NEF(10-18-2023 02:41:26 PM) Motion/Dismiss	Filing		10/18/2023-14:46		
Holder Properties	Motion/Dismiss	Motion		10/18/2023-14:41		
Holder Properties	Notice/Notice of Appearance	Filing		10/18/2023-14:41		
University of South Carolina	Notice/Notice of Appearance	Filing		10/06/2023-11:30		
University of South Carolina	Motion/Dismiss	Motion		10/06/2023-11:30	07/15/2024-11:30	
University of South Carolina	Service/Certificate Of Service	Filing		10/06/2023-11:30		
Reynolds Hall, Kamarah	Summons & Complaint	Filing		08/22/2023-13:33		

**FORM 7
PROOF OF SERVICE**

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

RECEIVED

FEB 20 2026

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
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Daniel Coble, Circuit Court Judge

Appellant Case No. 2024-001242
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Kamarah Reynolds-Hall

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Alexander-Coleman, Holder
Properties, University of South
Carolina, Defendants,**

Respondents.

**University of South Carolina
Holder Properties**

**MOTION TO ADD NEW EVIDENCE
AMENDMENT**

I certify that I am depositing a copy of it in the United States Mail, postage prepaid, February 20, 2026 addressed to the attorney of record Catherine Garbee Griffith, PO Box 8057, Columbia, South Carolina 29202. David DeMasters, PO Box 11412, Columbia, South Carolina 29211. Damon Wlodarczyk PO Box 12009, Columbia, South Carolina 29211.

February 20, 2026


Kamarah Reynolds-Hall
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PRO SE
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