

THE STATE OF SOUTH CAROLINA

In the Court of

Appeals

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APR 20 2026

SC Court of Appeals

APPEAL FROM OCONEE COUNTY

Court of Common Pleas

Judge Lawton McIntosh, Common Pleas

Case 2024CP3700195

Appellate Case No.

2025-001453

Christopher A. Pierce, Appellant

v.

Foxwood Hills Property Owners Association, Respondent

APPELLANT'S RESPONSE TO RESPONDNET'S RETURN ON APPELLANTS MOTION
TO REINSTATE APPEAL

Respondent's response represents a gross mischaracterization of events relating to Appellant's Motion to Reinstate. The issue related to the Motion is simply whether mail delays are grounds for a litigant's dismissal of his case when he has no control whatsoever of mail delivery? Also, whether his appeal by right should be denied due to US mail delays. Appellant, Respondent and Court have all experienced issues with the mail at some time with this case and others. For example in another case involving another Appellant Michael Jewell, Appellant Pierce filed his initial brief on April 6, 2025 and was not received by the court until April 29, 2025. Respondent in this case also experienced a mail delay and asked the court for leniency. That is all I am asking as well.

Respondent indicates that Appellant failed to include counsel in email on March 20, 2026 but in fact he is not required to send email to counsel and had already sent a copy of his Motion to Reinstate to him by mail with certificate of service. This was filed April 7, 2026 with proper certificate of service and filing fee. At this time I have been unable to contact the Court (SC Appeals Court) to ask about this issue. I believe the court is in error and forwarded email is in compliance with ACR 207. My motion was sent earlier on April 7, 2026. Respondent, an experienced partner and licensed lawyer with Hutchens Law Firm has also made numerous mistakes with handling of appeals yet he would ask the court that I not be afforded the same leniency as him. This seems rather hypocritical to me.

Appellant also complied with the Court in regards to sending all email he had with the court reporter Lisa Scott. Respondent incorrectly and inappropriately states that Appellant

did not comply with the request. Respondent goes on to mention that the Notice of Appeal was filed July 21, 2025 and we are now finally getting to the transcript. The delay was not Appellant's fault and Respondent is aware of it. Email was sent by Lisa Scott that was not received. She did try to contact me by mail. Email is not a reliable contact method of contact for me and Respondent has been specifically told that by me.

Respondent goes on to state that Appellant Pierce has numerous cases in Appeals Court and cites cases 2025-000223 and 2025-001211. The first case was primary Appellant Michael Jewell and Pierce was only included because of a motion he filed so he had very little to do with the case. The second case never even reached the initial brief stage and neither case went through to completion. Meanwhile Respondent John Kay is an experienced licensed lawyer and senior partner of a large law firm with extensive staff. The comparison is more like David against Goliath. Appellant Pierce has very little knowledge of Appeals. Therefore he is prone to errors due to lack of experience, yet even Respondent Kay has made errors and his experience is vastly superior to Appellant Pierce.

The delays do not affect Respondent Kay at all to my knowledge. He would simply like to deny Pierce his right of due process and appeal by right.

Appellant Pierce relies on ACR 260 for reinstatement of his case. He did not think it necessary earlier to cite the rule since both Court and Respondent are both vastly superior in legal knowledge to Appellant Pierce so did not believe he needed to inform them of it.

CONCLUSION

Appellant Pierce has made errors but has acted in good faith to try to get his appeal processed. Respondent Kay has also made errors throughout this case. Appellant Pierce feels he deserves an opportunity to present his appeal and that he will clearly win his appeal if given the opportunity.



Christopher A. Pierce

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Seneca, SC 29678

864-557-1258

Self Represented

Seneca, SC

April 14, 2026

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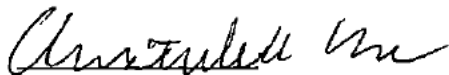
Christopher A. Pierce, Appellant

v.

Foxwood Hills Property Owners Association, Respondent

CERTIFICATE OF SERVICE

Christopher A. Pierce does certify that he deposited in first class mail a copy of APPELLANT'S RESPONSE TO RESPONDENT'S RETURN... to John Kay, Hutchens Law Firm P.O. 8237 Columbia, SC 29202 on April 14, 2026



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