

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
APPEAL FROM HORRY COUNTY

\_\_\_\_\_  
Court of Common Pleas  
Fifteenth Judicial Circuit  
B. Alex Hyman, Circuit Court Judge

**Case No. 2026 - 000708**  
\_\_\_\_\_

**RECEIVED**

**JUN 15 2026**

**SC Court of Appeals**

Joseph N. Grate,

Appellant.

v.

David A. Anderson, James J. Winebrake,  
Coastal Carolina University.

Respondents.

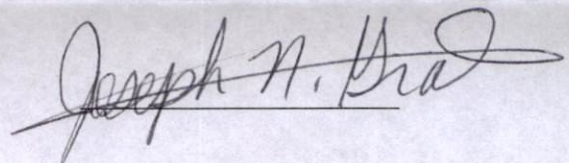
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**OBJECTION  
TO**

**RESPONDENTS' MOTION**

**TO STRIKE APPELLANT'S DESIGNATION OF MATTERS TO BE INCLUDED  
IN THE RECORD ON APPEAL**  
\_\_\_\_\_

Appellant hereby objects to, and moves the Court to dismiss, the subject Motion.

June 10, 2026



Joseph N. Grate, Pro Se  
P. O. Box 1294  
Pawley's Island, S. C. 29585  
(842) 742- 0696

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**AFFIDAVIT IN SUPPORT OF OBJECTION TO RESPONDENTS' MOTION  
TO STRIKE APPELLANT'S DESIGNATION OF MATTERS TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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Appellant, being duly sworn, deposes and states:

That your affiant Is the Appellant in the above-captioned matter; that on June 4, 2026, your affiant was served with a Motion to strike matters from his Designation of Matters to be included in this appeal.

Affiant further states that, Whereas - A Court- will eventually rule upon the propriety of the issues at bar, at this juncture Appellant's position with this court is as follows:

Per Respondents' insistence and presentation of these elements being included in the case at bar, followed by the Order drafted by Respondent and signed by Judge Hyman, after appellant's fail argument pertaining thereto;

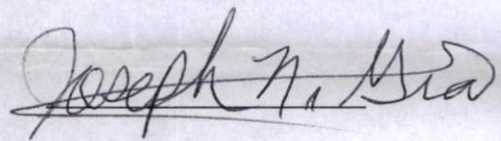
given that Respondents introduced and the Judge allowed these matters, against Appellant's position thereto;

given that Respondents introduced and the Judge allowed these matters, against Appellant's position thereto;

given that these matters are, explicitly and specifically addressed throughout the transcript, minus the judge's instruction / request for Order Drafting, the Designated Matters are therefore, properly before the present court; positioned there via Judge Hymans' Order.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

June 10, 2026



Joseph N. Grate, Pro Se  
P. O. Box 1294  
Pawley's Island, S. C. 29585  
(842) 742- 0696

Sworn and Subscribed before me  
On this 10<sup>th</sup> day of June 2026  
Margaret C. Kamp  
Margaret C. Kamp  
Notary Public for South Carolina  
My Commission Expires 4/21/2031



*[Faint handwritten signature]*

Sworn and Subscribed before me  
On this \_\_\_\_\_ day of \_\_\_\_\_  
19\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires \_\_\_\_\_



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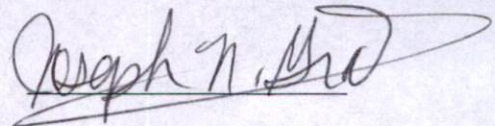
\_\_\_\_\_  
**Proof of service**  
\_\_\_\_\_

Appellant, certifies that a copy of the Affidavit and Objection to Respondents' Motion to Strike were served upon them, via U.S. Certified Mail, as indicated below:

Ashwin R. Sanzgiri  
Carmen V. Ganjehsani  
Eleanor P. White  
RICHARDSON, PLOWDEN & ROBINSON, PA  
Post Office Drawer 7788  
Columbia, South Carolina 29202

J. W Nelson Chandler  
CHANDLER LAW GROUP, LLC  
741 Johnnie Dodds Blvd, Suite 300  
Mount Pleasant, SC 29464

June 10, 2026



Joseph N. Grate, Pro Se  
P. O. Box 1294  
Pawley's Island, S. C. 29585  
(842) 742- 0696

June 10, 2026

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629 Columbia,  
South Carolina 29211

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JUN 15 2026

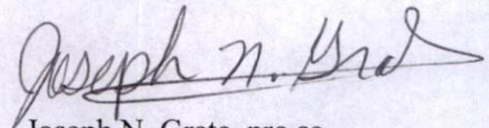
SC Court of Appeals

RE: Joseph N. Grate v. David A. Anderson, James J. Winebrake,  
Coastal Carolina University Case No. 2026 – 000708

Dear Ms. Kitchings:

Please find enclosed a copy of Appellant's Affidavit and Objection Motion, Re:  
Respondents' Motion to Strike, along with associated proof of service.

Sincerely,



Joseph N. Grate, pro se  
Post Office Box 1294  
Pawley's Island,  
South Carolina 29585  
(843)-742-0696

Joseph H  
P.O. Box 1294  
Pawleys Island  
S.C. 29585

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

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SC Court of Appeals

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