STATE OF SOUTH CAROLINA

IN THE SOUTH CAROLINA COURT OF APPEALS

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SC Court of Appeals

Appellate Case No. _____
(To Be Assigned)

Appeal From Florence County
Court of Common Pleas
Twelfth Judicial Circuit

Lower Court C/A No. 2025-CP-21-02046

The Honorable George M. McFaddin, Jr.
Circuit Court Judge

James R. Watson, Jr.,

Appellant,

v.

Lori Lee Creel,

Respondent.

FILED
2026 JUL -9 P 3:00
DORIS POULOS O'HARA
CCCP & GS
FLORENCE COUNTY, SC

CERTIFIED: A TRUE COPY
Doris Poulos O'Hara
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that Appellant, James R. Watson, Jr., pursuant to Rule 203, South Carolina Appellate Court Rules, appeals from the final judgment entered by the Court of Common Pleas for Florence County in the above-referenced action.

This appeal is taken from:

1. The Order Granting Defendant's Motion for Summary Judgment;
2. The Order entered on July 6, 2026, denying Appellant's Rule 59(e), SCRCP Motion to Alter or Amend Judgment and directing that the summary judgment order be filed as the Order of the Court; and

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STATEMENT OF ISSUES ON APPEAL

Appellant, James R. Watson, Jr., respectfully identifies the following issues for appellate review:

I.

Whether the Circuit Court erred in granting Respondent's Motion for Summary Judgment by concluding that no genuine issue of material fact existed.

II.

Whether the Circuit Court erred by granting summary judgment while Appellant's Motion to Compel Discovery and other discovery-related matters remained pending.

III.

Whether the Circuit Court erred in determining that Respondent's affidavit was sufficient to support summary judgment where Respondent did not produce the financial records, business records, profitability records, booking records, sales information, or other documentary evidence referenced in support of the motion.

IV.

Whether the Circuit Court erred in concluding that the parties' admitted oral business relationship could not, as a matter of law, support Appellant's claims.

V.

Whether the Circuit Court improperly resolved disputed factual issues concerning the parties' business relationship, the reasons for termination, and Appellant's damages at the summary judgment stage.

VI.

Whether the Circuit Court abused its discretion in denying Appellant's Motion to Compel Discovery without requiring production of evidence directly relevant to Respondent's asserted business justification for termination.

VII.

Whether the Circuit Court abused its discretion in denying Appellant's Rule 59(e), SCRCP Motion to Alter or Amend Judgment after Appellant asserted that summary judgment had been entered before discovery was completed and before a complete factual record had been developed.

VIII.

Whether the cumulative effect of the rulings challenged on appeal deprived Appellant of a full opportunity to develop and present his claims on a complete evidentiary record.

Appellant reserves the right to refine, clarify, or reorganize these issues in the Appellant's Brief as permitted by the South Carolina Appellate Court Rules.

Respectfully submitted this 9th day of July, 2026.

James R. Watson, Jr.

Appellant, Pro Se

102 Magnolia Drive

Florence, South Carolina 29506

Telephone: (843) 687-1264

Email: jwattslive@gmail.com

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CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of this Statement of Issues on Appeal upon counsel for Respondent by depositing the same in the United States Mail, first-class postage prepaid, addressed as follows:

William J. Edwards, Esq.
Finklea, Hendrick & Blake, LLC
P.O. Box 1317
Florence, SC 29503-1317

Charles B. Holbrooks, III, Esq.
Finklea, Hendrick & Blake, LLC
814 West Evans Street
Florence, SC 29501

This 9th day of July, 2026.

James R. Watson, Jr.

Receipt

Print Date: Jul 09, 2026

RETURN TO

JAMES WATSON
102 MAGNOLIA DR
QUINBY, SC 29506

SHIP TO

Charles Benny Holbrooks III
814 W EVANS ST
Po Box 1317
FLORENCE, SC 29503

REFERENCE

Ship Date:	Jul 10, 2026
Ship from ZIP:	29506
Weight:	0lbs. 1oz.
User:	DJJWATTSLIVE
Cost Code:	
Refund Type:	Mail-in
Reference #:	
Printed on:	Shipping Label
Delivery Status:	Printed
Tracking #:	9407111899561329932120

SERVICE	UNIT PRICE
USPS First-Class Mail® Large Envelope	$1.63
Insurance (Carrier Insurance ($0.00))	$0.00
Certified Mail	$5.30

Subtotal	$6.93
Label Quantity	1
Total Cost	$6.93

3. All interlocutory rulings, findings, conclusions, and adverse determinations that merge into or are reviewable upon appeal from the final judgment.

Appellant respectfully gives notice of appeal to the South Carolina Court of Appeals and requests review of the foregoing orders in accordance with the South Carolina Appellate Court Rules.

Respectfully submitted this 9th day of July, 2026.

James R. Watson, Jr.

Appellant, Pro Se

102 Magnolia Drive

Florence, South Carolina 29506

Telephone: (843) 687-1264

Email: jwattslive@gmail.com

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Finklea, Hendrick & Blake, LLC
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and

Charles B. Holbrooks, III, Esq.
Finklea, Hendrick & Blake, LLC
814 West Evans Street
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Ship Date:	Jul 10, 2026
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Cost Code:	
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Reference #:	
Printed on:	Shipping Label
Delivery Status:	Printed
Tracking #:	9407111899561329932120

SERVICE	UNIT PRICE
USPS First-Class Mail® Large Envelope	$1.63
Insurance (Carrier Insurance ($0.00))	$0.00
Certified Mail	$5.30

Subtotal	$6.93
Label Quantity	1
Total Cost	$6.93

James R. Watson, Jr.
102 Magnolia Drive
Florence, South Carolina 29506
(843) 687-1264
jwattslive@gmail.com

Date: _____

Clerk of Court

South Carolina Court of Appeals

Post Office Box 11629

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Re: James R. Watson, Jr. v. Lori Lee Creel

Lower Court C/A No. 2025-CP-21-02046

Appellate Case No. _____ (To Be Assigned)

Dear Clerk:

Please accept the enclosed appellate filing package submitted by Appellant, James R. Watson, Jr., for filing in the above-referenced appeal.

Enclosed are the following documents:

1. Notice of Appeal
2. Motion to Proceed In Forma Pauperis
3. Affidavit in Support of Motion to Proceed In Forma Pauperis
4. Proposed Order Granting Motion to Proceed In Forma Pauperis
5. Designation of Matter on Appeal
6. Statement of Issues on Appeal
7. Request for Preparation of Transcript
8. Certificate(s) of Service

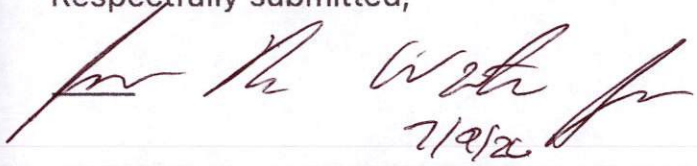
Please assign an appellate case number and process this appeal in accordance with the South Carolina Appellate Court Rules.

Should additional information or documentation be required, please notify me at the address,

telephone number, or email listed above.

Thank you for your attention to this matter.

Respectfully submitted,



James R. Watson, Jr.

Appellant, Pro Se

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