STATE OF SOUTH CAROLINA

IN THE SOUTH CAROLINA 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

RECEIVED
JUL 13 2026
SC Court of Appeals

James R. Watson, Jr.,

Appellant,

v.

Lori Lee Creel,

Respondent.

MOTION TO PROCEED IN FORMA PAUPERIS

COMES NOW the Appellant, James R. Watson, Jr., appearing pro se, and respectfully moves this Honorable Court for leave to proceed **In Forma Pauperis** in this appeal.

In support of this Motion, Appellant states as follows:

1. Appellant is the Plaintiff in the above-captioned action and now seeks appellate review of the final judgment entered by the Florence County Court of Common Pleas.
2. Appellant is financially unable to prepay the filing fees, transcript costs, and other expenses associated with this appeal.
3. Throughout this litigation, Appellant has proceeded without the financial resources necessary

to pay substantial court costs.

4. The issues presented on appeal are raised in good faith and are not frivolous. The appeal seeks review of substantial legal questions, including:

a. Whether the Circuit Court erred in granting summary judgment;

b. Whether summary judgment was entered before discovery was completed;

c. Whether the Circuit Court erred in denying Appellant's Motion to Compel Discovery;

d. Whether the Circuit Court properly denied Appellant's Rule 59(e) Motion to Alter or Amend Judgment;

e. Whether genuine issues of material fact existed precluding summary judgment.

1. Appellant respectfully submits that requiring payment of appellate costs would impose a substantial financial hardship and would effectively impair Appellant's ability to obtain appellate review.
2. Appellant files this Motion in good faith for the sole purpose of obtaining meaningful access to appellate review.

WHEREFORE, Appellant respectfully requests that this Court enter an Order:

A. Granting leave to proceed In Forma Pauperis;

B. Waiving appellate filing fees and any other costs authorized by law for an indigent litigant;

C. Granting such other and further relief as this Court deems just and proper.

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

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of this Motion 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
Post Office 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.

RECEIVED
JUL 13 2026
SC Court of Appeals

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

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AFFIDAVIT IN SUPPORT OF
MOTION TO PROCEED IN FORMA PAUPERIS

I, James R. Watson, Jr., being first duly sworn, state under oath as follows:

1. I am the Appellant in this action and make this Affidavit based upon my personal knowledge.
2. I desire to pursue this appeal in good faith and believe the issues presented are substantial and appropriate for appellate review.
3. Because of my financial circumstances, I am unable to prepay the filing fees, transcript costs, and other expenses associated with this appeal without substantial hardship.
4. My available financial resources are limited and are insufficient to pay the costs necessary to prosecute this appeal while also meeting my ordinary living expenses.

5. I do not have sufficient disposable income or liquid assets to pay the appellate filing fees and litigation expenses without depriving myself of the necessities of life.
6. I respectfully request permission to proceed In Forma Pauperis so that financial hardship will not prevent meaningful access to appellate review.
7. This appeal is filed in good faith and is not intended for delay or any improper purpose.
8. I understand that I remain responsible for providing truthful information to the Court and that this Affidavit is made under oath.

FURTHER AFFIANT SAYETH NOT.

James R. Watson, Jr.

Appellant

Date: 7/9/26

Florence, South Carolina

NOTARY

Sworn to before me this 9th day of July, 2026.

Penelope W. Bowden

Notary Public for South Carolina

My Commission Expires: 5/21/2031

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PROPOSED ORDER
GRANTING MOTION TO PROCEED
IN FORMA PAUPERIS

This matter comes before the Court upon the Motion of Appellant, James R. Watson, Jr., to proceed In Forma Pauperis in the above-captioned appeal.

The Court has reviewed the Motion, the Affidavit in Support of the Motion, and the record before the Court.

Based upon the representations made by Appellant concerning his financial condition and for good

cause shown, the Court finds that Appellant has demonstrated an inability to prepay the costs associated with this appeal.

IT IS THEREFORE ORDERED:

1. Appellant's Motion to Proceed In Forma Pauperis is GRANTED.
2. Appellant is authorized to proceed without the prepayment of appellate filing fees and other costs authorized by law, subject to the South Carolina Appellate Court Rules and any applicable statutes.
3. The Clerk of the South Carolina Court of Appeals shall process this appeal in accordance with the applicable Rules of Appellate Procedure.

IT IS SO ORDERED.

_____

Judge, South Carolina Court of Appeals

Date: _____

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

Columbia, South Carolina 29211

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SC Court of Appeals

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

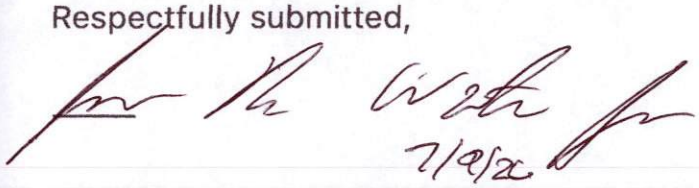
Please assign an appellate case number and process this appeal in accordance with the South Carolina Appellate Court Rules.

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

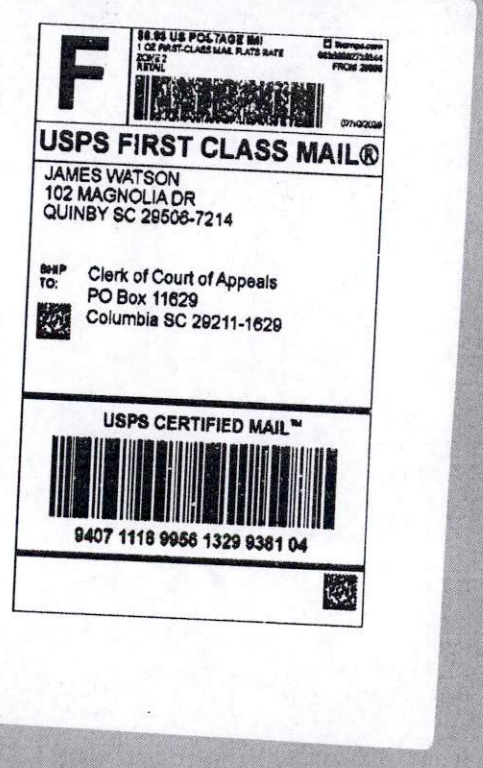
telephone number, or email listed above.

Thank you for your attention to this matter.

Respectfully submitted,



James R. Watson, Jr.

Appellant, Pro Se

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