

STATE OF SOUTH CAROLINA  
IN THE SOUTH CAROLINA COURT OF APPEALS

James R. Watson, Jr.,  
Appellant,

v.

Lori Lee Creel a/k/a Lori Marie Creel,  
Respondent.

Appeal From the Court of Common Pleas  
Twelfth Judicial Circuit  
Florence County

Lower Court Case No. 2025-CP-21-02092

STATEMENT OF ISSUES ON APPEAL

Appellant respectfully presents the following issues for review by the South Carolina Court of Appeals:

Issue I

Whether the circuit court erred in granting summary judgment under Rule 56, SCRCP, by concluding that no genuine issue of material fact existed and that Respondent was entitled to judgment as a matter of law. The summary judgment order found that no genuine issue of material fact existed and dismissed the complaint with prejudice.

Issue II

Whether the circuit court erred in concluding that the parties' oral agreement was unenforceable as a matter of law. The order found that the alleged oral arrangement lacked sufficiently definite terms to create an enforceable contract.

Issue III

Whether the circuit court erred in determining that Appellant failed to produce sufficient evidence to create a genuine issue of material fact regarding the existence of an enforceable agreement or entitlement to relief. The order states that Appellant had not produced sufficient evidence to establish a binding agreement or require a trial.

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Jul 16 2026

SC Court of Appeals

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*Doris Poulos O'Hara*  
CLERK OF COURT C.P. & G.S.  
FLORENCE COUNTY, S.C.

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2026 JUL 16 A 10:40  
DORIS POULOS O'HARA  
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FLORENCE COUNTY, SC

Issue IV

Whether the circuit court erred in denying Appellant's pending motions without separately addressing their merits after granting summary judgment. The order states that the court denied the pending motions after granting summary judgment and concluded they lacked sufficient legal or factual support.

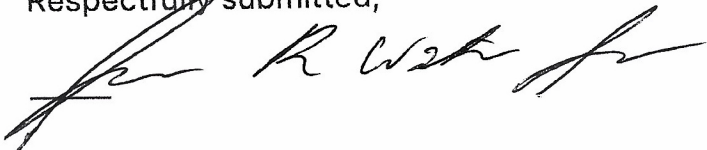
Issue V

Whether the circuit court abused its discretion in denying Appellant's Rule 59(e) Motion to Alter or Amend Judgment. The Form 4 states that the court denied the Rule 59(e) motion, determined that another hearing was unnecessary, and left the Summary Judgment Order in effect.

Issue VI

Whether the cumulative effect of the circuit court's rulings deprived Appellant of a full and fair opportunity to have the disputed issues resolved according to the South Carolina Rules of Civil Procedure and applicable law.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James R. Watson, Jr.", written over a horizontal line.

James R. Watson, Jr.

Appellant, Pro Se

Date: 7/14/20

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**Receipt**

Print Date: Jul 16, 2026

**RETURN TO**

JAMES WATSON  
102 MAGNOLIA DR  
QUINBY, SC 29506

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

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Refund Type: Mail-in  
Reference #:  
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|                | \$1.69 |
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|                | \$5.55 |
| Subtotal       | \$7.24 |
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