

FORM 7
PROOF OF SERVICE
MOTION TO SUPPLEMENT FINAL
BRIEF

RECEIVED
OCT 15 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of
Appeals

APPEAL FROM RICHLAND
COUNTY

Court of Common Pleas

Daniel Coble, Circuit Court

Judge

Appellant Case No. 2024-001242
Case No. 2023-CP-400-4408

Holder Properties

Respondent

v.

Kamarah Reynolds-Hall

Appellant,

Appellant comes now to ask the Honorable Court for a Motion to Supplement the Final Brief Arguments.

Appellant states his Due Process was violated by the respondents . A party cannot be deprived of their claims or defenses if they were denied a realistic, fair chance to present them due to structural, or opposing obstacles. **Logan v. Zimmerman Brush Co. 456 U.S 422 (1982).**

Chewning v Ford Motor Co, 346 S.C. 28, 550 S.E.2d 584 (Ct. App 2001) recognizes that the deliberate concealment or withholding of evidence can rise to the level of FRAUD ON THE COURT rendering judgements void because the integrity of the judicial process was compromised.

During the hearing, the respondent stated direct questions to the appellant that would prove they were with-holding key information that would change the outcome of the case.

SCRP Rule 26 (a) (1) (A) Initial Disclosures

Holder Properties violated the requirement to provide name and if known, the address and telephone number of each individual is likely to have discoverable information that the disclosing party may use to support its claims and defenses.

Nicole Martin is the Property Manager (NM) discovered. The discovery hired by Holder Properties with a start date of Oct 2, 2023. The same Property Manager previously worked for **CMM Realty** Sept 2015 to September 29, 2023, for 8 years 3 months.

Obstruction of Justice

Holder Properties has acted unlawful to conceal information during a civil case.

Nicole Martin -Concealed from the Appellant

Adam Sonenshine-False Affidavit submitted the night before the hearing. Appellant did not have the required 48 hours to evaluate as the law requires.

Brittany Blantz and Nicole Martin shared an Office and **Federal Law:** Holder chose to violate Federal Law when it decided to conceal the existence of the Summons and Complaint for **a total of 261 days of 365 days in a year.**

Holder Properties had a duty by law to return the certified mail that contained the summons and complaint to the post office.

(ABA) American Bar Association

The attorney for Holder Properties and the hired attorney have violated (ABA) American Bar Association rules listed below:

ABA Rule 4.1: Truthfulness in Statements to Others

In the course of representing a client a lawyer shall not knowingly:

- **make a false statement of material fact**

ABA Rule 8.4: Misconduct-Maintaining the Integrity of The Profession

It is professional misconduct for a lawyer to:

- engage in conduct involving dishonesty, deceit or misrepresentation.

The Appellate Court **to remand the case** to the lower court for **violating FEDERAL POSTAL LAWS**.

- S.C.A Code § 1701 - Obstruction of the mail

18 U.S.C.A Code § 1702 - Obstruction of correspondence

18 U.S.C.A Code § 1703 (b) Opening, destroying, or detaining mail without authority

SPOILAIATION

Holder Properties committed Spoiliation when it hid and opened the certified package addressed to Holder Property meaning for 261 days they acted if they didn't receive the now opened the certified package.

Federal Rule 60(b)(2) states a court may relieve a party from final judgement, order, or proceedings due to Diligence to find the "Newly Discovered Evidence" that with reasonable diligence was discovered after the hearing.

Ghent v Joint accreditation of Health Car Orgs No.JKB-20-331, 2021WL3560946 at * (D. Aug 11, 2021). The case clarifies that a pro se litigant failure to perfectly address argument. It holds that courts should liberally construe a pro se plaintiff opposition brief rather than applying the rigged Ferdinand-Davenport.

AFFADAVIT

South Carolina Rules of Civil Procedure-Affadavit

South Carolina Rules of Civil Procedure, if an affidavit or any other sworn statement is used to support a motion to dismiss—or any other motion—it **must be served on the**

opposing party along with the motion.

South Carolina Rules of Civil Procedure Rule 6(d)

Here is the breakdown of South Carolina (SC) rules regarding affidavits and dismissal:

1. Mandatory Service of Affidavits (Rule 6 and 56)

- **General Rule:** According to Rule 6(d), SCRCPP, when a written motion is supported by an affidavit, that affidavit must be served with the motion. It was not served as required.
- **Opposing Affidavits:** The opposing party has the right to serve their own affidavits in response, generally **no later than two days before the hearing**. It was not served as required and it was after hours.

(SCACR) Rule 613 of the Supreme Court may promulgate an order setting forth permissible methods of electronic service in the trial courts, including by e-mail. **A self-represented litigant who is not a lawyer admitted to practice in this state may consent in writing to be served by e-mail and designate a correct e-mail address for service.**

General Rule: According to Rule 6(d), SCRCPP, when a written motion is supported by an affidavit, that affidavit must be served with the motion. It was not served as required

- There was never no agreement in place to be contacted by email in place.
- There was agreement on file.

ARGUMENT I. DID THE APPELLANT FOLLOW THE RULES OF CIVIL PROCEDURE
APARTMENTS BETWEEN HOLDER PROPERTIES AND THE UNIVERSITY OF SOUTH
CAROLINA

ARGUMENT II. DID THE COURTS ERRED IN ITS RULING GRANTING THE MOTION TO
DISMISS FOR INSUFFICIENT SERVICE OF PROCESS

ARGUMENT III. WAS PROPER SERVICE INTERRUPTED BY THE RESPONDENT AND CMM
REALTY NICOLE MARTIN

ARGUMENT IV. THE RECONDANT SAYS APPELLANT ARGUED THAT SOMEONE SIGNED
FOR THE SUMMONS AND COMPLAINT BUT DID NOT PRESENT ANY EVIDENCE. OR THE
PERSON HAD ANY AUTHORITY

ARGUMENT V. THERE WAS NO WRITTEN AGREEMENT TO SERVE THE APPELLANT BY
EMAIL

ARGUMENT VI. THE CLAIMS BY THE RESPONDENT PROVE THEY WERE IN RECEIPT OF
THE SUMMONS AND COMPLAINT

ARGUMENT VII. DID THE CIRCUIT COURT GIVE THE APPELLANT A CHANCE TO RE-
ISSUE THE SUMMONS AND COMPLAINT BASED ON THE STATUTE OF LIMITATION

ARGUMENT VIII. DID THE CIRCUIT COURT GIVE THE APPELLANT A CHANCE TO RE-
ISSUE BASED ON OBSTRUCTION OF CORRESPONDENCE

ARGUMENT IX. DEFAULT JUDGEMENT AGAINST THE RESPONDENT

HOLDER CLAIMS THAT WERE ANSWERED

Claim 1. How they were served?

CMM Realty employee Nikole Martin is the new hire for Holder Properties that opened the certified mail that contained the summons and complaint and notified Adam Sonenshine, the one about the affidavit at the last minute. opened to Brittany Blantz who now shares offices for respondent.

October 2, 2023 to July 2024. Nikole Martin and Brittany Blantz shared the same office for respondent and had a duty by law to return the now opened certified mail that contained the summons and complaint to the post office.

Claim 2. HOLDER PROPERTIES claims there is no proof they have been served

- **Proper Service was interrupted** by the respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office.
- **CMM Realty Nikole Martin** (new hire for the respondent) opened the **certified mail that contained the summons and complaint.**
- Nikole Martin opened the certified mail containing the summons and complaint.

- **September 25, 2023.** PS Form 3811 was mailed back to the sender as to having receipt.
- **September 29, 2023.** Nikole Martin last day at CMM Realty.
- **October 2, 2023.** Employment start date for the respondent.
- **October 2, 2023 to July 2024.** Nikole Martin and Brittany Blantz **shared the same office for respondent.**

Claim 3. Claimed there was no registered agent authorized to sign for the certified mail that contained the summons and complaint at CMM Realty.

- **Obstruction of Correspondence**-The respondent and CMM Realty Obstructed the Correspondence and tampered with the certified mail that contained the summons and complaint.
- **CMM Realty Nikole Martin** (new hire from Respondent) opened the certified mail that contained the summons and complaint.

September 29, 2023. Nikole Martin last day at CMM Realty.

October 2, 2023. Employment start date for respondent.

October 2, 2023 to July 2024. Nikole Martin and Brittany Blantz **shared the same office for**

respondent. The respondent had the summons and complaint in their possession for a total of

261 days.

Claim 4. The respondent deliberate misrepresentation of fact that the wrong property management company was served.

The intended recipient was the respondent only.

Proper Service was interrupted by the Respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office.

Obstruction of Correspondence-Respondent and CMM Realty Obstructed the Correspondence

and tampered with the certified mail that contained the summons and complaint. The respondent

had the summons and complaint in their possession for **a total of 261 days.**

Nikole Martin (new hire for Respondent) **opened the certified mail that contained the summons and complaint.**

- **October 2, 2023 to July 2024.** Nikole Martin and Brittany Blantz **shared the same office for the respondent.**

CONCLUSION

The Judge for the Civil Court stated the case was without prejudice. That alone should have been enough to remand the civil case by to the lower court. There were 25 days remaining before the Statute of Limitation was set to expire.

Lastly the court should have granted a continuation when Holder Properties presented an Affidavit that the appellant is suppose to receive 48 hours before the hearing.

The Affidavit was not filed until the next day.



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Kamarah Reynolds-Hall

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Appellant,

PROOF OF SERVICE

I certify that I have filed a **Motion To Supplement Final Brief** by depositing a copy of it in the United States Mail, postage prepaid, on Oct 14, 2026 addressed to the attorney of record for **Holder Properties** Catherine Garbee Griffin PO Box 8057 Columbia, South Carolina 29202.

Oct 15, 2026



Kamarah Reynolds-Hall 5 Alatera
Court Columbia, South Carolina

(803) 237-6057
Pro Se



The South Carolina Court of Appeals

Kamarah Reynolds-Hall

10/15/2026

RECEIPT #109616

Fee Type:	Copying/Certification/Distribution Fee
Amount:	\$0.25
Payment Type:	Cash
Reference No:	
Check/Money Order Date:	10/15/2026
Comments:	Copy Fee