

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Chester County
Court of Common Pleas
Brooks P. Goldsmith, Circuit Court Judge

Case Number 2011-CP-12-0323

Mell Woods Appellant,

v.

John D. Hinson; Christine Jones; John C. Hinson; William L. Hinson; Lois Hinson; Robert Breakfield, as Personal Representative of the Estate of Reba P. Hinson; Elaine H. Hensley; Robert H. Hinson; George Standford, as Personal Representative of the Estate of Linda H. Standford; William C. Hinson, Jr.; Darrell W. Hinson; Mary Roe and John Doe, fictitious names used to designate all other parties, whose names are unknown, and any and all other persons claiming any right, title, estate, interest or lien upon the real estate described in the complaint,

. Respondents.

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Rule 240(f) SCACR

Reply of Appellant

Court of Appeals Internal Tracking Number 2012 212330

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1. Regarding South Carolina Statute § 15-67-100, and jury trials, appellant cites the following case:

Robert Trent Jones, Inc., v. B-F Limited Partnership, 276 S.C. 469, 279 S.E.2d 613 (1981), and the following Ruling from the same case:

"Moreover, courts of this State are required to take judicial notice of public laws or statutes."

2. So it can readily be seen that SC § 15-67-100 is part and parcel of a land title case; if a jury trial has been demanded, and the pleadings raise the issue of paramount title, then the proper procedure is to send the issue to a jury -- all of which is within the knowledge of the trial court to start with.

3. In addition, appellant supports this reply with the cases cited in the Petition for Rehearing filed in the Court of Appeals, and adopts by reference the entire Petition, as part of this Reply.

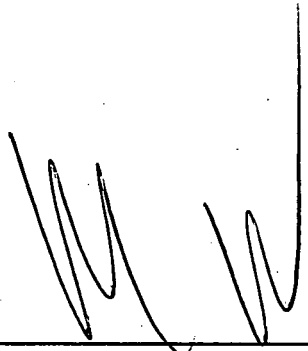
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Respectfully submitted,

This 03 day of February, 2014.



Mell Woods

P.O. Box 2603
Lancaster, SC 29721

CERTIFICATE OF SERVICE

Court of Appeals of South Carolina

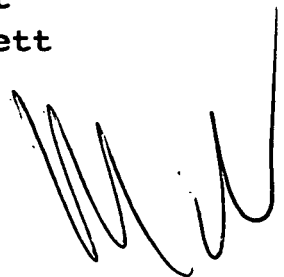
Case Tracking Number 2012-212330

Woods v. Hinson

I hereby certify that I have served the Respondents with a true copy of the within and foregoing Reply by depositing a copy of the Reply in the U.S. Mail, with sufficient postage, and addressed to the counsel of Record for Respondents, to wit:

B. Michael Brackett
Moses Koon & Brackett
P.O. Box 100261
Columbia, SC 29202

This 03 day of February, 2014.



Mell Woods

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