

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-12-0291

Robert H. Breakfield, as attorney-in-fact Respondent,

v.

Mell Woods Appellant.

Rule 240(f) SCACR Reply

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APR 01 2014

SC Court of Appeals

Court of Appeals Tracking Number 2012-212318

1. On March 12, 2014, Mell Woods the appellant herein filed a letter motion, paid the required fee, and asked for an extra seven days time to file a Petition for Rehearing in the above case.

ORIGINAL

2. Mr. Brackett, the Respondent counsel, has filed a return and claims in the return that appellant did not file the request for extra time, on time -- this assertion by Mr. Brackett is not true; appellant shows by Exhibit A that the assertion by Mr. Brackett is not true.

3. Mr. Brackett, the Respondent counsel will lose documents which have been served on him. Once, (in another case), Mr. Brackett lost an entire Brief and it was a month before he found it.

5. Mr. Brackett also gets time extensions, but he just does not want anyone else to have more time.

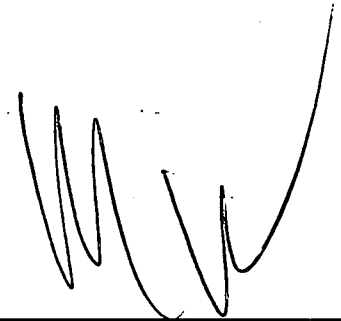
6. It is ordinarily a mere formality for the Clerk to authorize reasonable time extensions, but Mr. Brackett interferes with the system, by filing motions and constantly complaining to the clerk's office about everything he can think of; appellant has never complained when Mr. Brackett asked for time extensions.

7. Mr. Brackett's assertions to the Court about when
a pleading is served by mail is pure speculation.

8. As to the part about the e-mail that was transmitted
to Mrs. Kitchings over the weekend after the Motion letter
was sent by U.S. Mail, the e-mail was merely a back-up so that
the clerk's office could be looking for the paper motion
with the \$25.00 fee attached; as usual Mr. Brackett seized
upon the date of the e-mail to try to confuse the facts,
and the Record in this case.

9. Appellant respectfully asks that the Petition for Rehearing in this case be allowed for the reasons stated in the Motion by Letter to the Clerk of the Court of Appeals which was mailed on March 12, 2014, along with the \$25.00 motion fee and a copy of the letter placed in the U.S. Mail with sufficient postage, addressed to Mr. Brackett, the same day, March 12, 2014.

This 25 day of March, 2014.



Mell Woods


P.O. Box 2603
Lancaster, SC 29721

CERTIFICATE OF SERVICE

I hereby certify that I served the Respondent with a copy of the within and foregoing Reply to Return filed by Mr. Brackett, by placing a copy of the Reply in the U.S. Mail with sufficient postage and addressed to:

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

This 25 day of March, 2014.



Mell Woods

P.O. Box 2603
Lancaster, SC 29721

Mell Woods
P.O. Box 2603
Lancaster, SC

The Honorable
South Carolina
P.O. Box 11629
Columbia, SC 2

MELL WOODS

DATE MAR 12 2014 2655

PAY TO THE ORDER OF S.C. COURT APPEALS \$ 25.00

Twenty Five AND NO/100 DOLLARS

ARTHUR STATE BANK
UNION: SC 29379
864-427-1213

FOR Rule 263(b) motion Mell Woods

⑆053201034⑆ 9201 36221 2655

SAFETY

Re: *Petition for Rehearing*
Case Number 2012-212318
Robert H. Breakfield v. Mell Woods

Dear Mrs. Kitchings:


Exhibit A

Case: 2012-212318

Today, I found the decision in the above case posted on the internet. I have never received a paper copy of the decision from the court, as is the usual case, and knew nothing of the Court's decision until today. I have just calculated the time and it looks as if a litigant has 15 days in which to file a *Petition for Rehearing*. If I had known that the Court did rule against me I would have already filed a *Petition for Rehearing*. Since today is the 14th, or 15th day, I do not see how I could physically deliver the papers to the Court of Appeals within this time frame.

Please accept this letter with the \$25.00 Motion Fee attached as a Motion under Rule 263(b) SCACR that I be allowed an additional seven calendar days, or until March 19, 2014, as the last day to file a *Petition for Rehearing* in the above-styled case.

Thanking you in advance,


Mell Woods

Copy of this letter to:
Mr. B. Michael Brackett, counsel of record for respondents.

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March 12, 2014

Exhibit A

Case: 2012-212318

Mell Woods
P.O. Box 2603
Lancaster, SC 29721

The Honorable Jenny Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

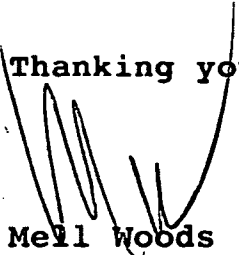
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Mell Woods

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SC Court of Appeals

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