

**THE STATE OF SOUTH CAROLINA**

**In The Court Of Appeals**

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Alison R. Lee, Circuit Court Judge

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Case No: 2012-212896

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Charles Taylor,

Appellant,

v.

Thomas Davis and  
State Farm Mutual Automobile Insurance Company, Respondents,

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**APPELLANT'S REPLY:  
TO RESPONDENTS' RETURN TO APPELLANT'S 12-17-13 MOTION**

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CHARLES TAYLOR  
POST OFFICE BOX 3652  
SUMTER SOUTH CAROLINA 29151  
(803) 883-7005  
FOR THE APPELLANT  
PRO SE

**RECEIVED**

JAN 06 2014

**SC Court of Appeals**

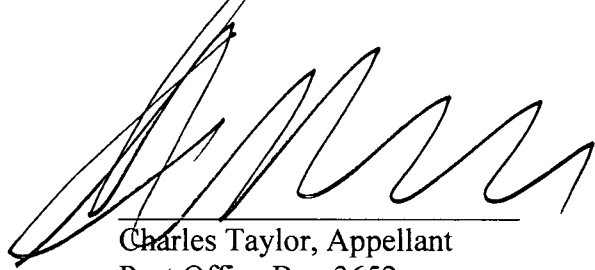
(1).As to Respondent Davis' return to Appellant's motion, Appellant incorporates same herein;

(2). As to Respondent State Farm's return; **Appellant Replies:** That therefore, the Court can more easily see the reason for Appellant's subject motion, and that, once the Court rules on it, everything accordingly will be clear to all the parties the same; and;

(3). All that's needed additionally--in the order to; (make it simple): reset the clock--strike all pleadings filed to date--Appellant then re-serve & re-file all pleadings over--beginning with the initial brief & designation of matter; and proceed again from there per the rules per all parties. Appellant believe this to be the simplest and fairest solution to all the confusion of the parties heretofore and believe this the most practical solution for all parties-to make a long story short!

(4).With the above foregoing solution, Appellant will therefore forego a most vigorous reply to Respondent State Farm's return, even though that is hard to do--given the inaccuracies /untruths in what is stated therein; but since such is moot anyway with the above solution, Appellant will let it go; except to say that the Court's ruling on the subject motion will suffice and therefore limiting what either of the 3 parties can submit beyond the ruling; is an attempt by Respondent State Farm-- preemptively--to game the **Final Record** to their advantage & to the disadvantage of the other party(s); which attempt is most unfortunate to letting the case be decided upon the full merits. Finally, Appellant would argue that, whatever the Final ROA rules, they should apply to **all parties** fairly and equally, contrary to what 1 Respondent wants per its return.

Most Respectfully Submitted,



Charles Taylor, Appellant  
Post Office Box 3652  
Sumter, South Carolina 29151  
(803) 883-7005

January 3, 2014

Sumter, South Carolina

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Note: That the Respondent State Farm in its return, made mention of the “transcript” which it apparently wish not be in the **Final ROA**; & that’s ironic since it’s the one document (22p. total) that can show exactly what documents per the hearing from which this appeal was taken *after* the case had ended on 1<sup>st</sup> appeal--w/no appeal taken therefrom for a year+! per scacr 221,242 & 205 thus it’s crystal clear why they would try and want to keep such central items hidden--regardless!

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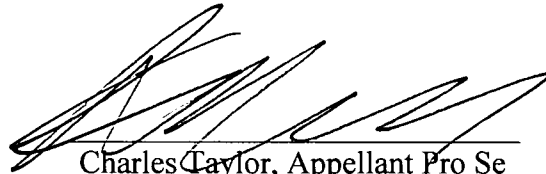
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**PROOF OF SERVICE**

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That Appellant have served a copy of his; Reply to Respondents' Return to Appellant's 12/17/13 Motion; upon Respondent Thomas Davis & Respondent State Farm Mutual Automobile Insurance Company to its counsel below by depositing same in the U.S. Mail, from Sumter, SC. on the date below, w/1<sup>st</sup> class duly affixed postage and a return address on envelope.

January 3, 2014



Charles Taylor, Appellant Pro Se  
Post Office Box 3652  
Sumter, SC 29151/(803) 883-7005

Mr. Thomas Davis, Respondent  
PO Box 773  
Manning, S.C. 29105

State Farm Mutual Automobile  
Insurance Company/Respondent  
Mr. James B. Lybrand, Jr., Esq.  
PO Box 58 / Columbia, S.C. 29202

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JAN 06 2014

**SC Court of Appeals**

January 3, 2014

The Honorable:  
Jenny Abbott Kitchings  
Clerk of the South Carolina  
Court of Appeals  
1015 Sumter Street  
Columbia, S. C. 29201

Charles Taylor  
P O Box 3652  
Sumter, S. C. 29151

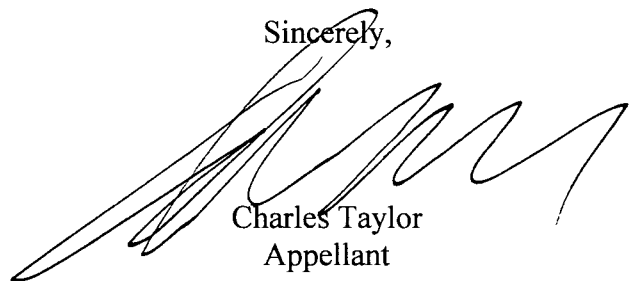
REF: Charles Taylor, Appellant  
v. Thomas Davis and State Farm  
Mutual Automobile Insurance  
Company, Respondents;  
Appellate Case No: 2012-212896

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JAN 06 2014  
**SC Court of Appeals**

**Dear Mrs. Kitchings:**

Please find enclosed for filing 1 original plus 6 copies; plus 1 to clerk and return to me in the SASE, of Appellant's Reply to Respondents' Return to Appellant's 12/17/13 Motion. If there are any questions, please let me know of them. With a copy of this letter, I am serving same to both Respondents below.

Sincerely,



Charles Taylor  
Appellant

CC: Respondent Thomas Davis  
PO Box 773, Manning, SC. 29105

CC: Respondent State Farm Mutual  
Automobile Insurance Company  
c/o: James B. Lybrand, Jr., Esq.  
PO Box 58, Columbia, S.C. 29202