

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM RICHLAND COUNTY

RECEIVED

JUL 30 2014

SC Court of Appeals

COURT OF COMMON PLEAS

Alison Renee. Lee, Circuit Court Judge

Appellate Case: 2012-212896

Charles Taylor,

Appellant,

v.

Thomas Davis and State Farm
Mutual Automobile Insurance Company,

Respondents,

Respondent Thomas Davis' return to Respondent State Farm's motion to strike Appellant's 3rd amended record on appeal; motion to dismiss appeal; and/or motion to permit Respondent State Farm to amend/supplement content of its final brief, all dated July 22-2014.

This Respondent Thomas Davis agrees with Appellant's return to Respondent State Farm motions for the reasons/grounds stated in Appellant's 7-28-2014 return; and furthermore because additionally;

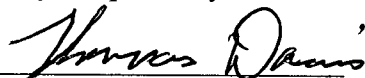
a.State Farm failed to mention, of the 95 pages it complained of in the subject 3rd amended Record on Appeal, [91-95 are addendum pages], approximately 1/3 of the 90 was submitted by State Farm, w/multiple pages attached to different item in their designation of matter, as they copied to me and; they also failed to mention the transcript [R.p.43-64] is almost another 1/3 of the subject 90 pages and; of course my desig. of matter is in last 1/3 and Appellant's the remainder, just as listed in his 7-15-13 DM;

b. Respondent State Farm also failed to mention that the Appellant's designation of matter copy [p.95 in the subject 3rd amended record on appeal in addendum section] was served July 15, 2013 and; that my amended initial brief [with its designation of matter], was served on August 5, 2013; and that State Farm's amended initial brief [with its designation of matter], was served August 16, 2013, so the misrepresentations by Respondent State Farm in its July 22-2014 motions, that it was not aware of what documents would be in the final record on appeal until [after] Appellant served the 3rd amended record on appeal on July 7-2014, is just that, misrepresentations to the court to gain what it want in its motions, [especially their great and desperate desire to dismiss the appeal] and,

c. Respondent State Farm is not as confuse about the 3rd amended record on appeal and other such things as it is trying to make it appear, which is tantamount to a trick on the court, to gain what it want as stated in its July 22-14 motions [State Farm ought to be ashamed of itself but of course given how this case got here, I am not at all surprise, because they want tell the truth for nothing] and,

d. Why should Respondent State Farm [only] get to re write its final brief at the last minute and no one else? On such bogus excuses as in its motions and it shouldn't be allowed, I believe, nor any of its other requests granted in its July 22-2014 motions, except to file its final brief promptly, if at all, matching exactly its August 16-2013 amended initial brief [just as everyone else did ref. para. b above].

Very Respectfully Submitted,


Thomas Davis, Respondent
Post Office Box 773
Manning, S. C. 29102

Manning, South Carolina

July 30, 2014

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS
Alison Renee Lee, Circuit Court Judge

Case: 2012-212-212896

Charles Taylor,

Appellant,

v.

Thomas Davis and State Farm
Mutual Automobile Insurance Company,

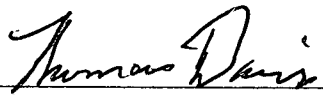
Respondents,

Proof of Service

I hereby certify that a copy of my Return to Respondent State Farm's July 22, 2014 motions; was served upon Appellant Charles Taylor and Respondent State Farm Mutual Automobile Insurance Company by depositing said papers in the United States Mail, Manning, South Carolina 29102, on the 30th day of July 2014, with first class postage duly affixed and a return address clearly indicated on the envelope, addressed as follows:

Appellant Charles Taylor
Post Office Box 3652
Sumter, South Carolina 29151

Respondent State Farm Mutual Automobile Insurance Company
Attorney: James B. Lybrand, Jr.
Post Office Box 58, Columbia, South Carolina 29202


Thomas Davis, Respondent
P O Box 773
Manning, S. C. 29102

July 30, 2014

To: The Honorable Jenny Abbott Kitchings
Clerk of the S. C. Court of Appeals
Post Office Box 11629
Columbia, S. C. 29211

From: Thomas Davis
Respondent
P O Box 773
Manning, S. C. 29105

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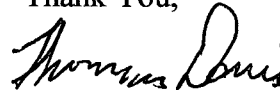
Case: Charles Taylor, Appellant v. Thomas Davis and State Farm Mutual Automobile Insurance
Company, Respondents; c/a no: 2007-cp-40-8423--Appeal case number: 2012-212896

Dear Mrs. Kitchings:

Enclosed are 1 original and 6 copies of my Return to Respondent State Farm July 22, 2014 Motions.

Please clock and return the other enclosed extra copy to me in the s.a.s.e. I am serving both the other parties a copy of the same. If there are any questions please inform me.

Thank You,

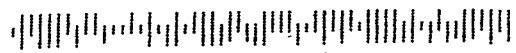


Thomas Davis
Respondent

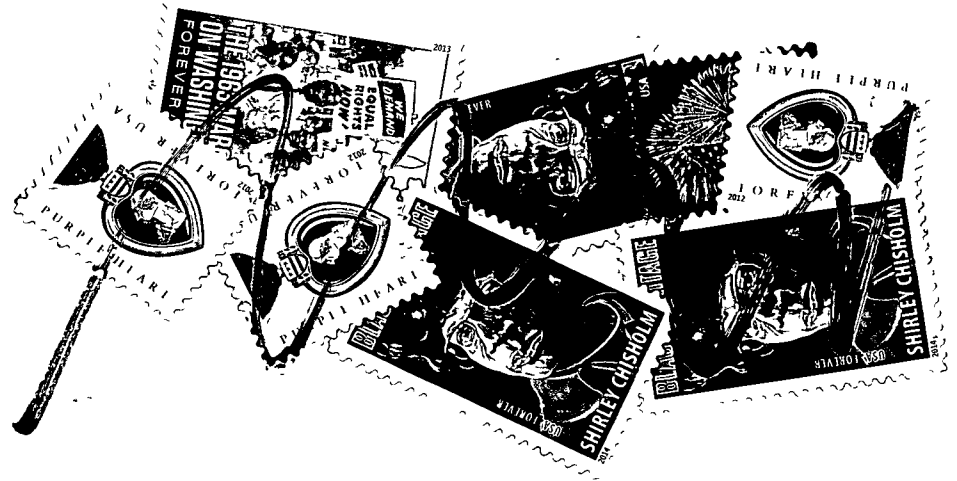
cc:

Mr. Charles Taylor
Appellant
P O Box 3652
Sumter, SC. 29151

State Farm Mutual Insurance Company
Respondent
Care of: Attorney James Lybrand
P o Box 58
Columbia, SC. 29202



THOMAS DAVIS
PO BOX 773
MANNING, S.C. 29105



S.C. COURT OF APPEALS
CLERK OF COURT
1015 SUMTER STREET
COLUMBIA, S C. 29201