

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Active/Retired Circuit Court Judge

Case No. 2012-CP-10-8135

REPLY

**RECEIVED**

AUG 18 2014

**SC Court of Appeals**

Karen Oliver,

Appellant,

v.

Amanda Lawrence and Trident United Way,

Respondents.

REPLY

Karen Oliver presents this Reply: The Appellant sent a copy of this reply also to Davidson and Lindemann not to show that she is in agreement with his actions that violated her Rights to Due Process. In the Response sent by Andrew Lindemann for the Respondents he highlighted the postal service. In my area which is rural we do not have the same consistent mail carrier. Just this week the USPS (United States Postal Service) is even more in the red than before even with a rate hike a year ago. So he wants to vouch for their reliability even when he is at fault. Clearly, in the correspondence dated August 5, 2014 he speaks of his mistake. Please review how he did not cc: a copy to the Clerk of Court's office for filing, Attachment 1. He has

compromised the process gravely. The Respondents' counsel prejudiced the reader of his filings by making it appear that the Appellant is non-compliant and unresponsive. Resulting in actions being taken by the Clerk's office **if** the Appellant was duly notified it would be appropriate morally and lawfully. The Clerk acted with the intent that the Respondents' counsel had duly notified the Appellant and that communication had been taking place hence, the Proof of Service.

Further, the letter dated July 25, 2014 was not received by the Appellant until August 1, 2014. An unknown youth gave it to my youth with another piece of mail that was properly addressed. Thanks be to God, whose timing!!! Also, it was properly addressed.

Consequently, prior to any Grievance Hearing the Appellant and Respondents communicated via Certified Mail by my request. They honored it until others had to become involved.

The Appellant has ordered the transcript as already presented to the Clerk along with proof of payment. Andrew Lindemann was not notified due to the Appellant not being made known of his position on the legal team for the Respondents.

The Appellant should have never had to go to Arbitration or a Grievance Hearing if the agreed upon contract would have been followed. Again with this motion for Reconsideration it should have never had to be filed if the Appellant would have been and should have been duly notified. So accepting his initial Motion is a direct insult to the Rules and a violation of my Right to Due Process.

  
Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065

Pro Se

Christy R. Fagnoli  
Clawson and Staubes, LLC  
126 Sevens Farm Drive Suite 200  
Charleston, SC 29492-8144  
Attorney for Respondents  
(843)577-2026

In Opposition:

Andrew Lindemann  
Davidson & Lindemann, P.A.  
P.O. Box 8568  
Columbia, SC 29202  
(803) 806-8222

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1945 Ghana Street  
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(843) 485-8065  
Pro Se

DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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\*Also Admitted In North Carolina  
†Certified Mediator

August 5, 2014

Of Counsel  
Kenneth P. Woodington

Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

Ms. Karen Oliver  
1945 Ghana Street  
Johns Island, South Carolina 29455

RE: Karen Oliver v. Amanda Lawrence and Trident United Way  
SCCA Case Number: 2013-002587  
Civil Action Number: 2012-CP-10-8135  
Claim Number: 21281499  
Our File Number: 307.9344

Dear Ms. Oliver:

In response to your recent motion, it appears that I have used the incorrect street address for prior mail sent to you. I apologize for that error. It appears that I have used 1975 Ghana Street (which does not exist) rather than the 1945 Ghana Street. None of the prior mis-addressed mail has been returned to me by the U.S. Postal Service. Therefore, in the event that you have not previously received that mail, I am enclosing a copy of the Notice of Appearance and the Motion to Dismiss Appeal, which supporting memorandum. In the future, please be certain to serve a copy of all filings and correspondence on me as counsel for the Respondents.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/  
Enclosures

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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J.C. Nicholson, Jr., Active/Retired Circuit Court Judge

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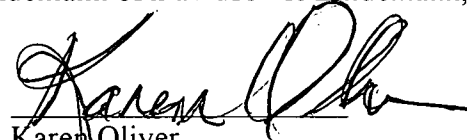
Amanda Lawrence and Trident United Way,

Respondents.

PROOF OF SERVICE

I certify that I served the Reply on Amanda Lawrence and Trident United Way by depositing a copy of it in the United States Mail, postage prepaid, on August 14, 2014, addressed to their attorney of record, Andrew F. Lindemann of Davidson & Lindemann, P.A. P.O. Box 8568 Columbia, SC 29202.

August 14, 2014



Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065  
Pro Se

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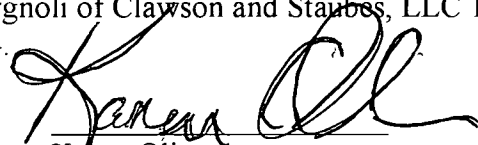
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August 14, 2014



Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065  
Pro Se

August 14, 2014

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AUG 18 2014

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

SC Court of Appeals

RE: Karen Oliver, Appellant, v. Amanda Lawrence and Trident United Way, Respondents.  
Appellate Case No. 2013-002587

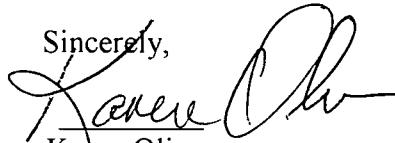
Dear Ms. Kitchings:

Enclosed for filing is the Reply. Also enclosed are the following:

(1) Proof of service of to the previously and newly made known counsel for the respondents.

The original and other submissions will be mailed in accordance with the rule.

Sincerely,



Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065  
Pro Se

cc: Christy Fagnoli  
Clawson and Staubes, LLC  
126 Sevens Farm Drive Suite 200  
(843) 577-2026  
Attorney for Respondent

In Opposition:

Andrew Lindemann  
Davidson & Lindemann, P.A.  
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