

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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AUG 18 2014

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

SC Court of Appeals

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.

REPLY to Motion for Costs.
Court of Appeals Internal Tracking Number 2012-212330

Appellant Mell Woods would be remiss in not not filing a return to the respondent motion for costs and attorney fees for the following reasons:

1. The respondent's case is built upon a fraud on the Probate Court of Chester County.

2. The facts are in the Record, but it should suffice here to repeat that Ned Gregory, II perpetrated a fraud upon the court when Gregory prepared a standard probate form in which the question is asked: Are you aware of any other wills? (the answer was "no".) *When in fact there are other wills.*

3. The respondent in this case Mr. Breakfield, then swore to the lie drafted by Gregory, with the net result of a *revoked will* being admitted to probate.

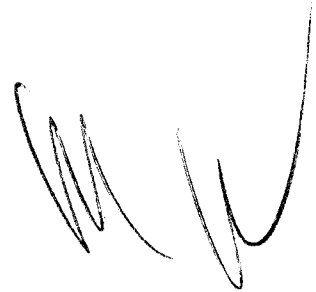
4. The result to appellant is that his land is being taken away based upon extrinsic fraud practiced on the Probate Court of Chester County by respondent Breakfield.

5. This is a case where respondent (as an attorney) embarked on a scheme to intentionally conceal documents, which is extrinsic fraud according to the Supreme Court in Chewing v. Ford Motor Company, 354 S.C. 72, 579 S.E.2d 605, (2003).

Based on the above reasons, appellant Mell Woods asks that the respondent motion for costs and attorney fees be denied.

Respectfully submitted,

this 14 day of August, 2014.



Mell Woods

P.O. Box 2603
Lancaster, SC 29721

Certificate of Service follows on next page:

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SC Court of Appeals

SOUTH CAROLINA COURT OF APPEALS

Number 2012-212330

Mell Woods, Appellant, v. John D. Hinson, Respondent.

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

Proof of Service

Trial Court Case Number: 2011-CP-12-00323
Court of Appeals Internal Tracking Number: 2012-212330

I hereby certify that I have on the 14 day of August, 2014, served the respondents with a true copy of the within and foregoing Return, [03 pages] by placing the copies in the U.S. Mail with sufficient postage addressed to:

Moses Koon & Brackett, PC
c/o: B. Michael Brackett
P.O. Box 100261
Columbia, SC 29202



Mell Woods

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