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SC Court of Appeals

Carlton E. Cantrell
223 Muddy Branch Road
Aiken, SC 29805

Telephone; (803) 215-4747

September 9th, 2014

Clerk of Court
Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re, Carlton Cantrell vs. Aiken County et al.
Aiken County Common Pleas No. 2014-CP-02-00879.
Appellant Case No. 2014-001702

Dear Mrs. Kitchings

By Copy of this letter I have enclosed a Copy of the signed Order and/or Judgement Dated August 28.

In The Court of Common Pleas July 7th Judge Doyet A. Early went in favor of the Defendants. I did the Notice of Appeal on August 4th and sent in the mail same day before the 30 day time limit was to expire.

On August the 12 I received a letter dated August 8th, with a tracking No. 2014-001702 and 10 days to pay the 100 filing fee and to send a copy of the Order and/ or Judgment that was the subject of the Appeal.

On August 18th I hand delivered a request for an extention and a Check for 100 Filing fee and a Check for 25 extention fee. The Clerk of Court stated that they would give me 30 days since I didn't request any specific time and if it took any longer that the New Man that was over the Court of Appeals, would probably do an investigation into the matter since he is trying to put a stop to these lawyers and Judges that are setting on these Orders.

On August 21st I received a letter from the Court of Appeals dated August 19th, requesting for a Copy of of the Order and/ or Judgement in question, but no time limit was given on the letter but within 10 days I received and unsigned Copy of the Order from the Defendants Lawyer with no date on the Order at my residence on August 25th and handed it into the Court of Appeals on the 29th and talked with Elizabeth Carter who said that she thought that he had already signed it by now.

On September the 4th In the after noon I received a Copy of the Signed Order from the Defendants lawyer by Mail the date of the signature August 28. I know that the date has to be after the 18th because I sent a Notary of Republic named Jan Voit to the Aiken County Court House to get a copy of the Summons and Complaint and the Aiken County Clerk said that they havent seen or heard anything about the Order in Question.

I have been told that Aiken County is well known for setting on Orders to give the Law enforcement time to come up with more charges against those that are seeking retribute fore damages that they have done in order to stop the court process.

Sincerley.



Carlton E. Cantrell. Apeellant. Pro Se.

Daniel C. Plyer
Davicson & Lindermann. PA
Attorneys for Respondents
PO Box 8568
Columbia. SC. 29202
803-806-8222

STATE OF SOUTH CAROLINA
COUNTY OF AIKEN

) IN THE COURT OF COMMON PLEAS
)
) Civil Action Number: 2014-CP-02-879
)
)

Carlton E. Cantrell,
Plaintiff,

) AFFIDAVIT OF DANIEL C. PLYLER
)

v.

Aiken County, Aiken County Animal Control
Director, Shirley Hardin, Aiken County
Animal Control Officer Bobby Arthurs, and
Judge Charles T. Carter,

Defendants.

PERSONALLY APPEARED BEFORE ME, Daniel C. Plyler, who first being duly sworn
deposes and states as follows:

- 1) I am an attorney licensed to practice within the state and federal courts within the State of South Carolina.
- 2) I have been retained in this case to represent the Defendants in this matter.
- 3) I have extensive experience in the defense of civil rights claims of the sort alleged within Plaintiff's Complaint.
- 4) My hourly rate for this matter is one hundred dollars per hour which is well within the range of a reasonable hourly rate for cases of this type.
- 5) In the course of my work, I keep an itemized time sheet for the purpose of billing for my services.
- 6) I have reviewed the bills in this case and make this affidavit based upon the charges incurred for the defense of the Defendants.

DP

7) In accordance with standard and customary practice of civil defense litigation, my time is billed in six-minute increments or one tenth of an hour.

8) On or about April 7, 2014 I spent a total of two tenths of an hour reviewing the Plaintiff's Complaint that had previously been dismissed two times in Civil Action No. 08-CP-02-887 and Civil Action No. 11-CP-02-01480. I also spent a total of two tenths of an hour communicating to my clients that Plaintiff had filed a third Complaint. The total charges incurred on this day were forty dollars and no cents (\$40.00).

9) On or about April 23, 2014 I spent a total of one tenth of an hour when Defendant Carter called to inform me that he had been served with a Plaintiff's Third Complaint. The total charges incurred on this day were ten dollars and no cents (\$10.00).

10) On or about May 2, 2014 I spent a total of two tenths of an hour communicating with my clients regarding litigation strategy and whether all of the individual defendants had been served. The total charges incurred on this day were twenty dollars and no cents (\$20.00).

11) On or about May 5, 2014, I spent a total of three tenths of an hour communicating with clients regarding my litigation plan and confirming that Defendant Aiken County and Defendant Harden had been served with Plaintiff's Third Complaint. The total charges incurred on this day were thirty dollars and no cents (\$30.00).

12) On or about May 6, 2014, I spent a total of one tenth of an hour communicating with clients regarding representing Defendant Hardin. The total charges incurred on this day were ten dollars and no cents (\$10.00).

13) On or about May 9, 2014, I spent a total of seven tenths of an hour communicating with the individual defendants regarding this case. I also communicated with my

insurance clients regarding file handling matters. The total charges incurred on this day were seventy dollars and no cents (\$70.00).

14) On or about May 23, 2014, I spent a total of one and three tenths (1.3) hours preparing and drafting Defendants' motion to dismiss, or in the alternative for summary judgment, Plaintiff's Third Complaint. Additionally, my office prepared a service letter and certificate of service with a filing fee of twenty-five dollars. The total charges incurred on this day were one hundred seventy five dollars and no cents (\$155.00).

15) On or about June 3, 2014, I spent a total of one tenth of an hour reviewing the clocked in copy of Defendants' Motion to Dismiss and Motion for Sanctions. The total charges incurred on this day was ten dollars and no cents (\$10.00).

16) On or about June 6, 2014, I spent a total of three tenths of an hour on this case. The tasks involved receiving and reviewing the hearing notice of Defendants' Motion to Dismiss and Motion for Sanctions, as well as, preparing a letter to Plaintiff regarding the fact that my clients' pending motions were to be heard by the Court on July 7, 2014. The total charges incurred on this day were thirty dollars and no cents (\$30.00).

17) On or about June 27, 2014, I spent a total of one tenth of an hour corresponding with the Aiken County Clerk of Court, to confirm that Defendants' motions would actually be heard. The total charges incurred on this day were ten dollars and no cents (\$10.00).

18) On or about July 5, 2014, I spent a total of eight tenths of an hour preparing to argue Defendants' Motion to Dismiss and Motion for Sanctions at the upcoming hearing. The total charges incurred on this day were eighty dollars and no cents (\$80.00).


19) On or about July 7, 2014, I spent a total of three and six tenths (3.6) hours traveling to and from, and attending, the hearing on Defendants' Motion to Dismiss and Motion

for Sanctions, which occurred at the Aiken County Courthouse. Additionally, I corresponded with my clients regarding the results of that hearing. The total charges incurred on this day were three hundred sixty dollars and no cents (\$360.00).

20) I believe that the time I have spent on these tasks is reasonable and necessary for the defense of this matter. I have not included the costs or fees for paralegals, assistants, copying, phone charges, and other miscellaneous expenses even though my client is ultimately responsible for those charges.

21) According to my calculations, I have expended eight hours (8.0) on tasks directly associated with the defense of this matter. The total of these charges, including one filing fee, is eight hundred, twenty-five dollars and no cents (\$825.00).

FURTHER AFFIANT SAYETH NOT.



Daniel C. Plyler

SWORN TO BEFORE ME THIS 22nd
DAY OF August, 2014.

Shelley E. Stafford (SEAL)
NOTARY PUBLIC FOR SOUTH CAROLINA

MY COMMISSION EXPIRES: 6-13-15

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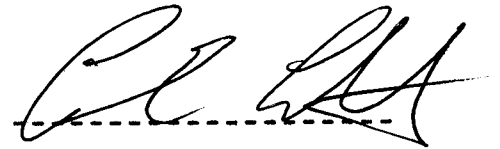
CERTIFICATE OF SERVICE

I Carlton E. Cantrell. do hereby certify that I have this day served a copy of the Order that I received by Mail from the Defendants on September 4th 2014 upon the South Carolina Court of Appeals and a Copy of the letter to the Clerk of Court and on the Defendants. Opposing Counsel. By placing same in the United states Mail properly addressed and with Correct Postage affixed thereto.

South Carolina Court of Appeals
PO Box 11629
Columbia. SC 29211

William H. Davidson. 11
1611 Devonshire Drive. 2nd Floor
PO Box 8568
Columbia. SC 29202.

September 9th 2014



Carlton E. Cantrell
223 Muddy Branch Road
Aiken SC 29805
803-215-4747
Plaintiff/Appellant

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DAVIDSON & LINDEMANN, P.A.

SC Court of Appeals

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Joel S. Hughes
Justin T. Bagwell
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Steven R. Spreeuwens
Todd R. Flippin

*Also Admitted In North Carolina
†Certified Mediator

September 2, 2014

Of Counsel
Kenneth P. Woodington

The Honorable Liz Godard
Aiken County Clerk of Court
Post Office Box 583
Aiken, South Carolina 29802-0583

RE: Carlton E. Cantrell v. Aiken County, Aiken County Animal Control Director, Shirley Hardin, Aiken County Animal Control Officer Bobby Arthurs, and Judge Charles T. Carter
Appellate Case No. 2014-001705
Civil Action Number: 2014-CP-02-879
Date of Incident: May 19, 2005
Our File Number: 333.7805

Dear Ms. Godard:

Please find enclosed the original and one copy each of the **Cover Sheet, Order Dismissing This Action With Prejudice, Enjoining the Plaintiff From Re-Filing This Matter, and Imposing Sanctions Upon the Plaintiff, and Affidavit of Daniel C. Plyler** relative to the above matter. Please file the originals, returning the clocked copies to me in the enclosed return envelope.

Thank you for your assistance in this matter. Please contact me with any questions or concerns.

Very Truly Yours,

DAVIDSON & LINDEMANN, P.A.


Daniel C. Plyler

DGP/ses
Enclosures

The Honorable Liz Godard
September 2, 2014
Page Two

cc: (w/Enclosures)

Mr. Carlton E. Cantrell
223 Muddy Branch Road
Aiken, South Carolina 29805