

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**Appeal from Chester County
Court of Common Pleas**

Brooks P. Goldsmith, Circuit Court Judge

**In the Matter of the Estate of Reba P.
Hinson, Probate # 2008-ES-12-297,
Circuit Court # 2010-CP-12-201,**

Mell Woods, Appellant,

v.

**Robert H. Breakfield, as Personal Representative
of the Estate of Reba P. Hinson, Respondent.**

RETURN TO MOTION FOR COSTS

Court of Appeals Internal Tracking Number: 2011-201066

RECEIVED

SEP 11 2014

SC Court of Appeals

1. This is the 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).

2. The respondent in this case, Mr. Breakfield, swore to a lie in a court proceeding in order to get a revoked will admitted to probate.

3. The Record in this case shows that respondent's case is built upon a fraud on the Probate Court of Chester County, with appellant Mell Woods as the victim.

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

Respectfully submitted,

this 08 day of September, 2014.



Mell Woods

P.O. Box 2603
Lancaster, SC 29721

**STATE OF SOUTH CAROLINA
COURT OF APPEALS**

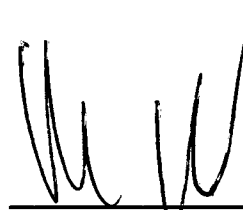
Case # 2011-201066

PROOF OF SERVICE

I hereby certify that I have served the respondent in this case by mailing a copy of the within and foregoing *Return to Motion for Costs* to the Counsel of Record for respondent to wit:

**Moses Koon & Brackett
C/O B. Michael Brackett
P.O. Box 100261
Columbia, SC 29202**

This 08 day of September, 2014.



Mell Woods

**P.O. Box 2603
Lancaster, SC 29721**