

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Marvin H. Dukes, III,
Master in Equity and Special Circuit Judge

RECEIVED
OCT 24 2014
SC Court of Appeals

CASE NO. 2014-001747

JOSEPH C. SUN..... Appellant

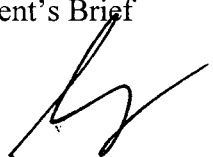
vs.

MARSHALL L. HORTON..... Respondents
AND RICHARD ULBRICH

**SUPPLEMENTAL INFORMATION SUBMITTED
TO SUPPORT RESPONDENT'S**

**MOTION TO HOLD THE RESPONDENT'S BRIEF IN ABEYANCE
UNTIL
THE FOLLOWING MOTIONS ARE HEARD AND DECIDED:
OBJECTION TO APPELLANT'S
MOTION TO FILE INITIAL BRIEF OUT OF TIME
AND
OBJECTION TO APPELLANT'S
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD OF APPEAL
AND
REQUEST TO STRIKE APPELLANT'S RESPONSE TO RESPONDENT'S MOTION
TO HOLD THE RESPONDENTS' BRIEF IN ABEYANCE**

Now comes, the Respondents, Marshall L. Horton (hereinafter the "Respondent") who provides the Court additional information in support of his request to require the Appellant to obtain and provide a copy of the transcript to the Court. The Appellant informs the Court that there is not a transcript in the underlying case. However, the Appellant has attached the following note to "Appellant's Response to Respondent's Motion to Hold the Respondent's Brief

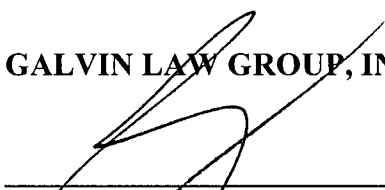


in Abeyance” which confirms that a transcript exists and Appellant has misled the Court and is refusing to order a transcript. The original note is attached as Exhibit “A” hereto.

The Respondent received the Appellant’s Response to Respondent’s Motion to Hold the Respondent’s Brief in Abeyance on October 21, 2014 via US Mail, but the document has a sworn service date of October 14th, 2014. It is believed that this document was served much later than indicated and should be stricken due to the fact that the date of service is mistaken at best.

The Appellant further asks the Court to inquire into the date stamp on the envelope which was provided to the Court and act appropriately if the service date was not correct.

GALVIN LAW GROUP, INC.



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ggalvin@galvinlawgroup.com

Bluffton South Carolina
22nd day of October, 2014

Exhibit "A"

A Tip to You

If you really want the transcript of Hearing
Order it Yourself instead of missing
deadline of your brief

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CASE NO. 2014-001747

JOSEPH C. SUN..... Appellant

vs.

MARSHALL L. HORTON..... Respondents
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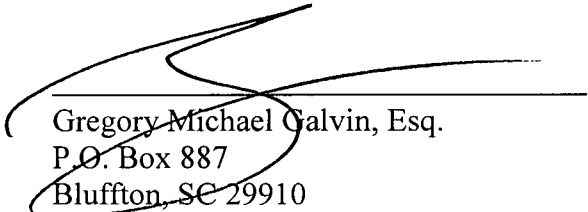
CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the **SUPPLEMENTAL INFORMATION SUBMITTED TO SUPPORT RESPONDENT’S MOTION TO HOLD THE RESPONDENT’S BRIEF IN ABEYANCE UNTIL THE FOLLOWING MOTIONS ARE HEARD AND DECIDED: Respondents’ Objection to Appellant’s Motion to File Initial Brief out of Time and Objection to Appellant’s Designation of Matter to be Included in the Record on Appeal and REQUEST TO STRIKE APPELLANT’S RESPONSE TO RESOPNDENT’S MOTION TO HOLD THE RESPONDENTS’ BRIEF IN ABEYANCE** by mailing a true and correct copy of same to the following, with adequate postage affixed thereto, addressed as follows:

Joseph Sun
Post Office Box 151
Bluffton, SC 29910

Lindsay Goodman, Esq.
Post Office Box 3766
Bluffton, South Carolina 29910

GALVIN LAW GROUP, INC.



Gregory Michael Galvin, Esq.
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Bluffton, South Carolina
22nd day of October, 2014



Galvin Law Group

Probate □ Criminal Defense □ Civil Litigation □ Real Estate

Licensed in District of Columbia, Ohio & South Carolina
Special Assistant Attorney General for the State of Georgia
Also licensed as a Patent Attorney before the United States Patent & Trademark Office

October 22, 2014

Via Federal Express

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29201

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SC Court of Appeals

RE: Joseph Sun vs. Marshall Horton
Case No. 2014-001747

Enclosed please find for filing in connection with the above-mentioned matter:

An original and Fifteen (7) copies of the Supplemental Information Submitted to Support Respondent's Motion to Hold the Respondent's Brief in Abeyance Until the Following Motions are Heard and Decided: Motion to Hold Respondent's Brief in Abeyance until the following Motions are decided: Respondents' Objection to Appellant's Motion to File Initial Brief out of Time and Objection to Appellant's Designation of Matter to be Included in the Record on Appeal.

Please file the original documents and provide me with one time-stamped copy of each document. By copying all parties, I am serving them with a copy of this letter.

Should you require any additional information in order to process this request, please do not hesitate to contact me.

Very truly yours,

Gregory Michael Galvin, Esq.

cc: Joseph Sun (via U.S. Mail)
Lindsay Goodman, Esq. (via U.S. Mail)
Marshall Horton, Esq. (via electronic mail)



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P.O. Box 887 • Bluffton, SC 29910

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
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