

**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**

CASE NO. 2014-001747

JOSEPH C. SUN..... Appellant

vs.

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

**RESPONDENT'S MOTION TO DISMISS,
MOTION TO STRIKE
AND
MOTION FOR SANCTIONS**

RECEIVED

DEC 18 2014

SC Court of Appeals

Now comes, the Respondents, Marshall L. Horton (hereinafter the "Respondent") who requests the following relief:

- A. The denial of the Appellant's Motion to File Initial Brief Out of Time due to the fact that the only reason which Appellant was given additional time was due to Appellant's false statements to the Court;
- B. The dismissal of the Appellant's appeal because the Appellant did not comply with its September 9, 2014 letter and order the transcript by September 19, 2014;
- C. Striking the Appellant's filing on December 15, 2014 which he provides the Court with information showing that he ordered a transcript due to the fact that this filing was not properly served, a defect which cannot be corrected by a later filing.



- D. If the Court strikes the December 15, 2014, filing, the Respondent requests that the appeal be dismissed because the Appellant did not comply with the Court's December 2, 2014 Order within the Ten (10) days since the filing was not proper.
- E. Sanctioning the Appellant and requiring that all Respondent's attorney's fees and costs be paid and dismissal of the appeal.

The reasons for these prayers for relief are provided below.

STATEMENT OF FACTS

On September 9, 2014, this Court sent a letter to the Appellant informing the Appellant of the following:

Our records reflect that a copy of the document ordering the transcript should have been filed. As of today's date, we have not received proof that you timely ordered the transcript and made payment arrangements with the court reporter. Further, you have not notified us that you already possessed the transcript at the time of filing your appeal, nor have we received your initial brief.

Please a copy of the document ordering the transcript, along with a motion to file out of time, within ten (10) days of the date of this letter, or your appeal will be dismissed.¹
(See Exhibit "A").

In response to this letter, the Appellant filed a Motion to File Initial Brief out of Time and made the following statement to the Court:

As no transcript of the hearing was available or necessary, the due date of the Appellant's Initial Brief was believed to be from the date of the Amended Notice of Appeal². [Emphasis Added].
(See Exhibit "B").

In response to the Motion to File Initial Brief Out of Time, the Respondents filed an Objection to Appellant's Motion to File Initial Brief Out of Time and Objection to Appellants' Designation of Matter to be Included in the Record of Appeal. (See Exhibit "C").

¹ Letter from Court of Appeals dated September 9, 2014.

² Motion to File Initial Brief out of Time, filed September 22, 2014.

Later, on October 22, 2014, the Respondent filed a Supplement to the Original Brief which provided the Court with a note from the Appellant which proved that the Appellant knew a transcript existed and simply misrepresented facts to the Court. A copy of the text of the note is as follows:


A Tip to You
If you really want the transcript of the Hearing
Order it Yourself instead of missing
deadline for your brief³

On December 2, 2014, the Court issued an Order providing in part that "Appellant shall provide proof that he has ordered the transcript within ten days or this appeal may be dismissed"⁴

On December 18, 2014, the undersigned counsel called the Court to determine if the appeal was dismissed for the Appellant's failure to comply with the Court's December 2, 2014 Order. However, counsel was informed that a document was sent from the Appellant showing that the Appellant had ordered a transcript. However, although the document stated that the copied the undersigned with the filing. As of December 18, 2014, the undersigned has not received the filing. Further, the undersigned spoke with Ms. Lindsay Goodman's office on December 17th, 2014 and they were not in receipt of the filing as of December 17, 2014, and the undersigned believes that Ms. Goodman has still not received a copy of this filing. It has been over 8 days since the Appellant purportedly mailed the filing to the undersigned and the filing has not been received to this date (See Affidavit of Gregory Michael Galvin, Esq. – Exhibit "D").

³ See Supplemental Information Submitted to Support Respondents Motion to Hold the Respondent's Brief in Abeyance filed October 24, 2014.

⁴ See Order filed for Record on December 2, 2014.



**THE APPELLANT FAILED TO ORDER THE TRANSCRIPT WITHIN 10 DAYS OF
SEPTEMBER 9, 2014.**

As stated above, the Court sent a letter to the Appellant and directed that a copy of the document ordering the transcript be provided within 10 days from September 9, 2014, or the appeal would be dismissed. (See Exhibit "A").

The Appellant filed a false statement informing the Court that a transcript did not exist (See Exhibit "B"). The Respondents objected to this filing and asked that the Court dismiss the appeal due to the fact that a transcript did exist and the Appellant had not complied with the Court's September 9, 2014 directive.

As a result, the Appellant did not comply with the Court's directive within Ten (10) days and as result, the appeal should be dismissed for Appellant's failure to comply with the Court's September 9, 2014 directive.

THE APPELLANT'S MOTION TO FILE OUT OF TIME SHOULD BE DENIED

The Respondent filed an objection to the Appellant's Motion to File out of Time and the Respondent's knowledge the Court has not ruled on this Motion. The Respondent moves for the Court to deny the Appellant's Motion to File out of Time because the only reason the appeal was not dismissed earlier was due to the fact that the Appellant filed a false statement with the Court attesting that a transcript did not exist and as a result, the Appellant's filing was frivolous. South Carolina Appellate Court Rules: Rule 269, SCACR the Court can "impose upon offending attorneys or parties such sanctions as the circumstances of the case and discouragement of like conduct in the future may require." The proper sanction would be to deny and/or strike, the Appellant's Motion to File out of Time because it is simply untrue and the reasons cited in this motion were simply not true.



**THE APPELLANT'S LETTER DATED DECEMBER 10, 2014 SHOULD BE STRICKEN
FROM THE RECORD BECAUSE IT WAS NOT SERVED AND DOES NOT INCLUDE
A PROOF OF SERVICE**

A review of the online record reveals that the Appellant has sent a letter to the Court of Appeals dated December 10, 2014, providing a document purporting to show that he has ordered the transcript in the underlying case. However, the undersigned has not been served with a copy of this filing. (See Exhibit "E"). The filing does contain a carbon copy stating that he mailed the documents to the undersigned, but over eight days have elapsed and the undersigned still has not been served with this filing. Further, the undersigned contacted the other counsel in this case, Ms. Lindsay Goodman, and as of November 17, 2014, she had not received the filing (See Exhibit "D").

Rule 262(a)(2) of the Appellate Court Rules provides that "[a]ny document filed with the appellate court shall be accompanied by proof of service of such document on all parties. [Emphasis Added]" A proof of service was not filed. Further, the document was not served upon counsel for record. Therefore, the filing is insufficient and cannot be corrected due to the fact that the filing was not served upon counsel of record.

Since the filing does not comply with the rules and cannot comply since it was not served, the Respondent requests that the appeal be dismissed because the failure to serve cannot be corrected. If the filing is re-filed, Ten (10) days will have elapsed and the filing will be significantly out of time in violation of the Court's December 2, 2014 Order.

SANCTIONS

All parties have spent significant time in proving that the Appellant's false statement. This has created a significant burden on all counsel in this case. Pursuant to South Carolina Appellate Court Rules: Rule 269, SCACR, the Court can "impose upon offending attorneys or parties such sanctions as the circumstances of the case and discouragement of like conduct in the



future may require.” The undersigned requests that the Court provides both sanctions in the form of attorney’s fees, costs for both Respondents and the dismissal of the Appellant’s appeal. The Respondent believes that the sanction of dismissal is proper because without the false statement, the Court would have dismissed the case on September 19, 2014 for the Appellant’s failure to order the transcript.

CONCLUSION

For the aforementioned reasons the Respondent requests the following relief:

- A. The denial of the Appellant’s Motion to File Initial Brief Out of Time due to the fact that the only reason which Appellant was given additional time was due to Appellant’s false statements to the Court;
- B. The dismissal of the Appellant’s appeal because the Appellant did not comply with its September 9, 2014 letter and order the transcript by September 19, 2014;
- C. Striking the Appellant’s filing on December 15, 2014 which he provides the Court with information showing that he ordered a transcript due to the fact that this filing was not properly served, a defect which cannot be corrected by a later filing.
- D. If the Court strikes the December 15, 2014, filing, the Respondent requests that the appeal be dismissed because the Appellant did not comply with the Court’s December 2, 2014 Order within the Ten (10) days since the filing was not proper.
- E. Sanctioning the Appellant and requiring that all Respondent’s attorney’s fees and costs be paid and dismissal of the appeal

GALVIN LAW GROUP, INC.

Gregory Michael Galvin, Esq.
P.O. Box 887
Bluffton, SC 29910
843-227-2231
888-362-0714 Fax
ggalvin@galvinlawgroup.com

Bluffton, South Carolina
18th day of October, 2014
Rosen

**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**

CASE NO. 2014-001747

JOSEPH C. SUN..... Appellant

vs.

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

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the RESPONDENT'S MOTION TO DISMISS, MOTION TO STRIKE AND MOTION FOR SANCTIONS 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.
P.O. Box 887
Bluffton, SC 29910
843-227-2231
888-362-0714 Fax
ggalvin@galvinlawgroup.com

Bluffton, South Carolina
18th day of December, 2014

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DEC 18 2014

SG Court of Appeals



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMTER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

September 09, 2014

Joseph C. Sun
Post Office Box 151
Bluffton SC 29910

Re: Joseph C. Sun v. Marshall L. Horton
Appellate Case No. 2014-001747

Dear Mr. Sun:

Our records reflect that a copy of the document ordering the transcript should have been filed. As of today's date, we have not received proof that you timely ordered the transcript and made payment arrangements with the court reporter. Further, you have not notified us that you already possessed the transcript at the time of filing your appeal, nor have we received your initial brief.

Please a copy of the document ordering the transcript, along with a motion to file out of time, within ten (10) days of the date of this letter, or your appeal will be dismissed.

Be sure to copy the Court and opposing counsel with all correspondence concerning the transcript.

Very truly yours,

CLERK

Exhibit "A"

cc: Gregory Michael Galvin, Esquire
Lindsay Yoas Goodman, Esquire

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

73607

**APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas**

Marvin H. Dukes, III, Master-in-Equity

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SEP 22 2014

CASE NO. 2014-001747

SC Court of Appeals

JOSEPH C. SUN Appellant

v.

**MARSHALL L. HORTON Respondents
and RICHARD ULBRICH**

MOTION TO FILE INITIAL BRIEF OUT OF TIME

Appellant moves the court for leave to file his Initial Brief out of time on the ground that he was uncertain of the date that his Amended Notice of Appeal was considered filed and the date when the Initial Brief was actually due. Appellant postmarked and served his Amended Notice of Appeal on August 23, 2014. Therefore, this Initial Brief would be on time from the date of the Amended Notice of Appeal.

As shown in the attached copy of the Circuit Court Judgment entered on July 22, 2014, Mr. Horton was still the Attorney for the Respondents, therefore, all service copies should have sent to Mr. Horton. Appellant's original Notice of Appeal was correctly prepared and served according to court record, but was required by this court to file and serve the Amended Notice of


Exhibit "B"

causing the delay. This confusion was caused by the Respondents' counsels' failure to file their Notices of Appearance at the Circuit Court causing the court record to have Mr. Horton be the counsel on record, and Appellant simply followed the official court record in his original Notice of Appeal.

As no transcript of the hearing was available or necessary, the due date of Appellant's Initial Brief was believed to be from the date of the Amended Notice of Appeal.

Appellant prays the court for leave to file his Initial Brief out of time without the transcript of the hearing, in the event the counting of time started on the date he filed his original Notice of Appeal.

Respectfully submitted,



JOSEPH C. SUN, pro se
P. O. Box 151
Bluffton, SC 29910
843-227-0963

PROOF OF SERVICE

I certify that I have this date served the Appellant's Motion to File Initial Brief Out of Time on Respondents Horton and Ulbrich by depositing a copy of same in the U.S. Mail postage prepaid, on September 17, 2014, addressed to their attorneys on record at:

Gregory Michael Galvin, Esq.
Attorney for Marshall Horton
P.O. Box 887
Bluffton, SC 29910

This 17th day of September, 2014

Lindsay Y. Goodman, Esq
49 Boundary Stree, 2nd Fl.
P. O. Box 3766
Bluffton, SC 29910



JOSEPH SUN

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SEP 22 2014

SC Court of Appeals

For Clerk of Court Office Use Only

This judgment was entered on 11th day of July, 2014, and a copy mailed first class or placed in the appropriate attorney's box on 22nd day of July, 2014, to attorneys of record or to parties (when appearing pro se) as follows:

Joseph Sun
PO Box 151
Bluffton, SC 29910

Marshall L. Horton, Esq.
PO Box 3766
Bluffton, SC 29910

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

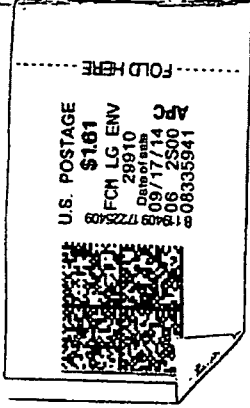
Trena Patterson/staff

Court Reporter

Jerri Ann Roseneau - Clerk of Court

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.



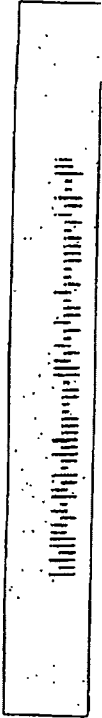
J.C. SUN
 P.O. Box 151
 Bluffton, SC 29910

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SEP 22 2014

SC Court of Appeals

clerk of Court of Appeals
 S.C. Court of Appeals
 P.O. Box 11629
 Columbia, SC 29211



**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**

CASE NO. 2014-001747

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SC Court of Appeals

173165

JOSEPH C. SUN..... Appellant

vs.

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

**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**

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DEC 18 2014

SC Court of Appeals

Now comes, the Respondents, Marshall L. Horton and Richard Ulbrich (hereinafter collectively the "Respondent), who files his objection to the 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. The reasons for these objections are provided below.

OBJECTION TO APPELLANT'S MOTION TO FILE INITIAL BRIEF OUT OF TIME

In the Appellant's Motion to File Initial Brief out of Time, the Appellant states that "As no transcript of the hearing was available or necessary... (Motion to File Initial Brief Out of Time, Page 2). The Respondent believes that a transcript does exist because Judge Marvin Dukes, III, has a full time court reporter who attends all/most hearings in his Court. For these reasons, the Respondent believes that a transcript does exist for the hearing before Judge Dukes

JMS

Exhibit "C"

and moves for the Court to require the Appellant to obtain any transcripts which relate to this case.

OBJECTION TO APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

The Respondent objects to the inclusion of the amended complaint, and moves for it to be excluded from the record because the amended complaint was not ever served on the Respondent. Further, the Common Pleas Court record reveals that an original amended complaint was not ever filed with the Court, but instead only a copy was filed.

The Respondent also objects to the Appellant's Designation of Matter and moves for the following items to be included in the Record of Appeal which include: (1) the Affidavit in Support of Motion to Dismiss filed by Marshall Horton, Esq. and all documents which supported the affidavit and (2) transcripts of all hearings which were held before Judge Marvin Dukes, III.

CONCLUSION

Based on the foregoing facts and arguments the Respondent move for the relief requested in this Motion.

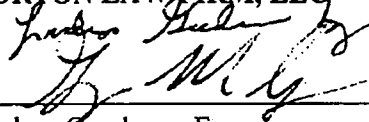
GALVIN LAW GROUP, INC.



Gregory Michael Galvin, Esq.
P.O. Box 887
Bluffton, SC 29910
843-227-2231
888-362-0714 Fax
ggalvin@galvinlawgroup.com

Bluffton, South Carolina
2nd day of October, 2014

HORTON LAW FIRM, LLC



Lindsay Goodman, Esq.
49 Boundary Street, 2nd Floor
Post Office Box 3766
Bluffton, South Carolina 29910
843.757.6190
843.757.6191 (facsimile)
www.hortonlawfirmllc.com

Bluffton, South Carolina
2nd day of October, 2014

**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**

CASE NO. 2014-001747

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DEC 18 2014

SC Court of Appeals

JOSEPH C. SUN..... Appellant

vs.

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

**AFFIDAVIT
OF
GREGORY MICHAEL GALVIN, ESQ.**

I, Gregory Michael Galvin, Esq., having been duly sworn, depose and say the following:

1. I am 18 years of age or older, and I give this affidavit on the basis of my personal knowledge of facts and circumstances concerning the matters described herein.
2. I represent Marshall Horton, Esq., a Respondent, in the above captioned appeal.
3. As of December 18, 2014, I have not been served with a copy of the Appellant's December 10, 2014 letter to the Court of Appeals (the "LETTER").
4. My staff and I have regularly checked my mail.
5. On December 17, 2014, I spoke with Lindsay Goodman, Esq., counsel for Mr. Richard Ulbrich, respondent in this action, and she had not received the LETTER, or any filing proving that the Appellant had ordered the transcript.

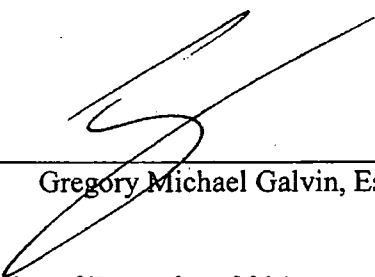
Exhibit "D"



6. I was not made aware of the LETTER until I inquired with the Court of Appeals to find out if the appeal had been dismissed, since Ten (10) days had elapsed since the Court's December 2, 2014 Order.

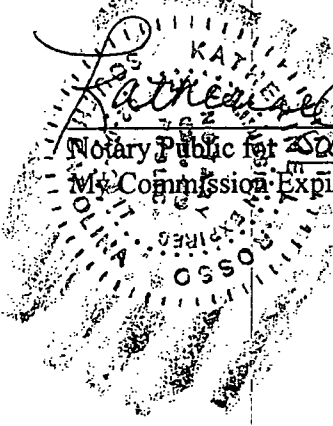
7. On December 18th, 2014 at approximately 3:30 pm I checked the firm's Post Office Box, just before signing this affidavit and to date, I have not been served with the LETTER. However, after speaking with the Court, I did download a copy from the Court of Appeals website.

This 18th day of December, 2014.



Gregory Michael Galvin, Esq.

Sworn to and subscribed before me this 18th day of December, 2014.


Katharine J. Rosse
Notary Public for South Carolina
My Commission Expires: 02/07/2017

Vertical line or separator



P. O. Box 151
Bluffton, SC 29910
December 10, 2014

Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

Re: Sun v. Horton, et al, Appeal Case No. 2014-001747
Beaufort County Court of Common Pleas 2014-CP-07-00238

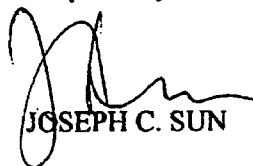
Gentlemen:

Attached please find a copy of email correspondences I made with the Court Report Deborah Thomas who took down the record at the hearing at Judge Marvin Duke's Office on April 23, 2014 in the referenced case.

Since I have already paid for the transcript and it will be delivered to me in about four weeks, please accept this letter and attachment as my "proof of purchase" in compliance with the court order of December 2, 2014.

Thank you for your cooperation.

Respectfully submitted,


JOSEPH C. SUN

Attachments

cc: Gregory Michael Galvin, Esq
Lindsay Yoas Goodman, Esq

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SC Court of Appeals

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DEC 15 2014

SC Court of Appeals

Exhibit "E"

(26192 unread) - jossunn1095 - Yahoo Mail

Page 1 of 1

Thomas, Deborah S.
me
McLeod, Heather

Our admin assistant, Heather, has delivered to me a personal money order from you in the amount of \$250. I will place your request in line to be prepared. At this time, I would expect to have your transcript completed in about four weeks. Please feel free to contact me if you have any questions regarding this matter.

Deborah S. Thomas, CVRM
803-206-7390 mbl
843-255-5712 ofc

From: Josie Gunn [mailto:jossunn1095@yahoo.com]
Sent: Wednesday, December 10, 2014 7:24 AM
To: Thomas, Deborah S.
Subject: Re: Transcript of Hearing

Ms. Thomas, Thank you for the info. But this is insufficient.

I've already paid you in full the \$250.00 as you asked for yesterday.
S.C. Court of Appeals requires me to file a **"Proof of Purchase"** of the Transcript. Please send me a letter and email that you have received the full payment of the transcript and that it will be delivered in about 4 weeks.
Thank you for your cooperation.
Joe Sun

On Tuesday, December 9, 2014 10:34 AM, "Thomas, Deborah S." < > wrote:

Thank you for your request. As I mentioned to you this morning, I have at least seven requests ahead of yours. Your transcript will be sent out as soon as possible, but it will likely be three or four weeks before it's completed and I won't even start it until I have received your payment. Please feel free to contact me if you have any questions.

Deborah S. Thomas, CVRM
803-206-7390 mbl
843-255-5712 ofc

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DEC 15 2014
SC Court of Appeals

(26192 unread) - jossunn1095 - Yahoo Mail

Page 1 of 1

From: Josie Gunn [mailto:jgunn@scj.net]
Sent: Tuesday, December 09, 2014 10:22 AM
To: Thomas, Deborah S.
Subject: Transcript of Hearing

Ms. Thomas: Per our telephone conversation I am bringing you a Money Order of \$250.00 for the purchase of the transcript of Hearing on April 23, 2014 in Civil Case No. 2014-CP-07-00238. Please confirm receipt of the money and the approximate date that the transcript will be delivered. My mailing address is: J. C. Sun, P. O. Box 151, Bluffton, S.C. 29910

I need that information at the S.C. Court of Appeals as soon as possible.
Thank you for your cooperation.
Joe Sun



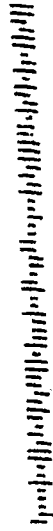
COLUMBIA SC 29211

11 DEC 2014 PM 3:1

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DEC 18 2014

**Clerk of Court
Court of Appeals of South Carolina
P. O. Box 11629
Columbia, SC 29211**



29211+1629

J. C. Sun
P. O. Box 151
Bluffton, SC 29910

FAX COVER SHEET

TO

COMPANY

FAX NUMBER 18037341839

FROM Gregory Galvin

DATE 2014-12-18 22:40:17 GMT

RE Sun vs. Horton

COVER MESSAGE

Gregory Michael Galvin
Gregory Michael Galvin, Esq.
Galvin Law Group, Inc.
P.O. Box 887
14 Westbury Park Way, Suite 104
(physical/overnight)
Bluffton, SC 29910
(843) 227-2231
(888) 362-0714 Fax
ggalvin@galvinlawgroup.com<mailto:ggalvin@galvinlawgroup.com>

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DEC 18 2014

SC Court of Appeals

FOR SECURITY PURPOSES, THE FACE OF THIS DOCUMENT CONTAINS A COLORED BACKGROUND AND MICROPRINTING IN THE BORDER



Proctor & Kinghorn Attorneys at Law
P.O. BOX 887
BLUFFTON, SC 29910
843-227-2231
888-362-0714 FAX

FIRST CITIZENS BANK & TRUST
1 WESTBURY PARKWAY
BLUFFTON, SC 29910

1580

December 18, 2014

PAY TO THE ORDER OF

South Carolina Court of Appeals

\$ 25.00

Twenty Five and 00/100ths Dollars

DOLLARS

VOID VOID VOID

MEMO

Sun vs. Marshall Horton - Motion Fee

AUTHORIZED SIGNATURE

SECURITY FEATURES INCLUDED. DETAILS ON BACK

⑈001580⑈ ⑆053201487⑆ 29001 2424501⑈

GALVIN LAW GROUP, INC.

WWW.COMCHECKS.COM 843.227.2231

1580

December 18, 2014

South Carolina Court of Appeals

25.00

Twenty Five and 00/100ths Dollars

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DEC 18 2014

Sun vs. Marshall Horton - Motion Fee

SC Court of Appeals

GALVIN LAW GROUP, INC.

WWW.COMCHECKS.COM 843.227.2231

1580

December 18, 2014

South Carolina Court of Appeals

25.00

Twenty Five and 00/100ths Dollars

Sun vs. Marshall Horton - Motion Fee

ENDORSE CHECK HERE

X

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DEPOSITORY BANK ENDORSEMENT



Listed below are the security features provided on this document which meet and/or exceed industry guidelines.

Security Features:

- Micro-Printing
- Watermark
- Colored Background
- Void copy protection

Results of check alteration:

- Small type in border of check and endorsement area appears blurred if copied or scanned.
- Artificial watermark on back. Hold at an angle to view.



GalvinLawGroup

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

December 18, 2014

Via Federal Express

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

RECEIVED

DEC 18 2014

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 Respondent's Motion to Dismiss, Motion to Strike and Motion for Sanctions as well as a check for \$25.00.

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)