

Paul A. Davis  
14639 C.R. Koon Highway  
Newberry, S.C. 29108  
803 321 7414  
davis979@gmail.com

Jenny Abbott Kitchings  
Clerk Of Court  
South Carolina Court Of Appeals  
P.O. Box 11629  
Columbia, S. C. 29211

RE: Charleston Harbor Resort & Marina v. Paul A. Davis  
South Carolina Court Of Appeals, Case No. 2014-001345

Dear Ms. Kitchings:

Please find enclosed for filing the original Appellant's Response to Order dated 01-09-2015 to be included in the Record on Appeal by the Appellant, and Proof Of Service.

By copy of this letter, the Appellant's Response to Order Dated 01-09-2015 to be included in the Record On Appeal by the Appellant are served upon William A. Scott, Attorney for the Respondent.

Sincerely,



Paul A. Davis  
Appellant Pro Se

**RECEIVED**

JAN 16 2015

**SC Court of Appeals**

cc: William A. Scott



THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

APPEAL FROM CHARLESTON COUNTY

Court Of Common Pleas

The Honorable Mikell R. Scarborough, Master In Equity

**RECEIVED**  
JAN 16 2015  
SC Court of Appeals

Case No. 2009-JG-10-685

Appellant Case No. 2014-001345

Charleston Harbor Resort & Marina

Respondent

v.

Paul A. Davis

Appellant

APPELLANT'S RESPONSE TO ORDER  
DATED 01-09-2015

In response to the Appellant's motion to amend my designation of matter to include certain items, I would like to notify this court these items were not submitted to the trial court. It is my opinion, the fact that these items were not submitted to the trial court was a major mistake. These statements and newsletters are continuing to be mailed (please see attached most recent dated Jan. 2015) to 14639 C. R. Koon Highway, Newberry, S.C. 29108, to an active address since 1997, as confirmed by Mr. Ronnie Derrick Postmaster/OIC 1321 College Street, Newberry S.C. 29108 is conclusive evidence respondent's attorney had access to an active

address at which I could have been served. Due to the importance of this evidence, which represents conclusive proof that respondent's attorney had knowledge and access to a local and active address at which I could have been served , please consider accepting these additional documents into the record on appeal.

Thank You for your consideration in this matter.

Respectfully,

A handwritten signature in cursive script that reads "Paul A. Davis". The signature is written in black ink and is positioned above the typed name and contact information.

Paul A. Davis  
14639 C.R. Koon Highway  
Newberry, S.C. 29108  
803 321 7414  
[davis979@gmail.com](mailto:davis979@gmail.com)  
Pro SE

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

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APPEAL FROM CHARLESTON COUNTY

Court Of Common Pleas

The Honorable Mikell R. Scarborough, Master In Equity

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Case No. 2009-JG-10-685

Appellate Case No.2014-001345

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Charleston Harbor Resort and Marina,

Respondent

v.

Paul A. Davis,

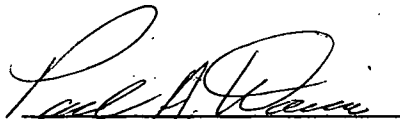
Appellant

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CERTIFICATE OF SERVICE

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I hereby certify that I served Appellant's response to the order dated 01-09-2015 on Charleston Harbor Resort and Marina by depositing a copy of it in The United States Mail, postage prepaid, on January 16, 2015 addressed to its Attorney of record, William A. Scott, PC Pedersen & Scott 775 St. Andrews Boulevard, Charleston, SC 29407.



Paul A. Davis Pro Se  
14639 C.R. Koon Highway  
Newberry, S.C. 29108  
803 321 7414  
[davis979@gmail.com](mailto:davis979@gmail.com)

RECEIVED

JAN 16 2015

SC Court of Appeals



# STATEMENT

ACCOUNT NO.	DATE
07105	01/01/15

Paul Davis  
14639 C, R. Koon Hwy  
Newberry, SC 29108

AMOUNT  
ENCLOSED \$ \_\_\_\_\_

PLEASE DETACH AND RETURN THIS PORTION WITH PAYMENT.

DATE	INVOICE NO.	DESCRIPTION	CHARGES	PAYMENTS	BALANCE
01/01/08	893912	Dockage	273.06		273.06
01/03/08	894810	Elec 01/03/08-01/03/08 11311 - 11140 X 0.12000	25.00		298.06
02/01/08	895551	Dockage	650.00		948.06
02/01/08	895750	Environmental Fee	5.00		953.06
02/06/08	896045	Elec 02/05/08-02/06/08 11385 - 11311 X 0.12000	25.00		978.06
03/01/08	896485	Dockage	650.00		1,628.06
03/01/08	896679	Environmental Fee	5.00		1,633.06
03/06/08	897048	Elec 03/06/08-03/06/08 11528 - 11385 X 0.12000	25.00		1,658.06
04/01/08	897635	Dockage	650.00		2,308.06
04/01/08	897828	Environmental Fee	5.00		2,313.06
04/01/08	945878	April dockage rate increas	33.00		2,346.06
04/08/08	898289	Elec 04/01/08-04/08/08 11579 - 11528 X 0.12000	25.00		2,371.06
04/30/08	899766	Elec 04/30/08-04/30/08 11582 - 11579 X 0.12000	25.00		2,396.06
05/01/08	899013	May Dockage	650.00		3,046.06
05/01/08	899211	Environmental Fee	5.00		3,051.06
05/01/08	945879	May dockage rate increase	33.00		3,084.06
06/01/08	901446	Transient Dockage	1,057.50		4,141.56
06/01/08	901447	Environmental Fee	5.00		4,146.56

CURRENT	30 DAYS	60 DAYS	90 DAYS	AMOUNT DUE
0.00	0.00	0.00	4,146.56	\$4,146.56

*Thank You*



**Daily Hours:**

Mon-Thursday - CLOSED

Friday-Saturday 5pm - 12am

Sunday 11am - 5pm

**HAPPY HOUR**

Friday 5 - 7 pm

\$3.50 Glasses of House wine

\$3.00 Domestic Beer

\$4.00 Import Beer

\$5.00 Draft Beer

\$1.00 Off All Liquor



**BREAKFAST:**

6:30 - 10:30 am

SATURDAY & SUNDAY

6:30 am - 11:00 am

**ROOM SERVICE:**

6:30 - 10:00 pm



**DAILY HOURS:**

11 am - 10 pm

**BRIDGE BAR:**

3 pm - weather permitting

Happy Hour

Mon-Fri 4 pm-7pm

Become a fan on  
Facebook and like  
us!

<https://www.facebook.com/charlestonharbor.marina>

**Around the Marina**

**Dock Talk**

Hello everyone! The monthly dock talk will be held on Saturday, January 17th, behind the Marina Office from 5 to 6:30pm. As always, refreshments will be served. We will discuss various topics related to the well being of the marina. Feel free to come early for any specific questions I can answer for you. Look forward to seeing you on the docks.

**Marina Tenant Appreciation Breakfast**

The marina would like to show our tenants that we appreciate you by providing a complimentary breakfast every Saturday morning from 8 -9 am in the marina office for donuts, coffee, and juice.

**Oysters on the Point**

Oyster lovers, join us Saturday, Jan 24th, from 2pm-6pm for Oysters on the Point at the Charleston Harbor Resort. We will have buckets of oysters, Build your own Bloody Mary Bar, and live music. Be sure to mark your calendars for the 2015 Oysters on the Point on Feb 21st from 2pm-6pm.

**Facebook Page**

In the next month or so, we will be redoing the Charleston Harbor Marina Facebook page to focus more on the marina and getting important information out to our tenants. If you have any ideas or things you would like to see on there, please contact Jacque via phone or email during business hours. Your input matters to us so please let us know what we can do to make improvements!

**WELCOME NEWBIES**

We welcome you to the Charleston Harbor Resort & Marina.  
Take a moment to stop and say hello to the "Newbies."

AEXT 03 DIMUZIO BOAT      C33 LIONHART  
D31 RALLY POINT      F43 VINLAND SAGA

**JANUARY**

		High				Low	
		AM	HT	PM	HT	AM	PM
1	Thu	4:42	5:7	5:04	5:0	11:05	11:10
2	Fri	5:35	5:8	5:56	5:0	11:57	
3	Sat	6:23	5:9	6:44	5:0	12:00	12:46
4	Sun	7:08	5:9	7:28	5:0	12:47	1:30
5	Mon	7:49	5:8	8:11	5:0	1:31	2:12
6	Tue	8:28	5:7	8:51	4:9	2:13	2:51
7	Wed	9:05	5:6	9:31	4:8	2:53	3:28
8	Thu	9:42	5:4	10:09	4:7	3:31	4:04
9	Fri	10:18	5:2	10:49	4:6	4:10	4:39
10	Sat	10:55	5:0	11:30	4:5	4:50	5:14
11	Sun	11:35	4:8			5:34	5:53
12	Mon	12:16	4:5	12:19	4:6	6:23	6:38
13	Tue	1:06	4:6	1:10	4:5	7:18	7:28
14	Wed	2:02	4:7	2:06	4:4	8:19	8:25
15	Thu	3:01	4:9	3:05	4:4	9:21	9:24
16	Fri	3:59	5:2	4:05	4:6	10:21	10:22
17	Sat	4:56	5:5	5:02	4:8	11:17	11:19
18	Sun	5:50	5:9	5:57	5:1		12:10
19	Mon	6:42	6:2	6:51	5:3	12:13	1:00
20	Tue	7:33	6:4	7:43	5:5	1:06	1:50
21	Wed	8:23	6:5	8:35	5:7	1:58	2:39
22	Thu	9:13	6:4	9:27	5:7	2:50	3:27
23	Fri	10:03	6:2	10:21	5:7	3:43	4:17
24	Sat	10:55	5:9	11:17	5:6	4:37	5:08
25	Sun	11:49	5:5			5:34	6:01
26	Mon	12:16	5:5	12:46	5:2	6:35	6:57
27	Tue	1:17	5:4	1:46	4:9	7:38	7:55
28	Wed	2:20	5:3	2:47	4:7	8:43	8:55
29	Thu	3:23	5:3	3:47	4:6	9:46	9:54
30	Fri	4:22	5:3	4:44	4:7	10:44	10:49
31	Sat	5:15	5:4	5:36	4:7	11:37	11:40



# THE BEACON JANUARY 2015

THE MONTHLY NEWSLETTER OF CHARLESTON'S  
PREMIER MARINA



## Admin Corner

As we say goodbye to 2014 and hello to a brand new year, I would like to cover a few topics to look for in 2015. I have been working hard on getting the accounting side of the marina under control and working properly. There have been some hiccups, but if you continue to bear with me while I work through them all, I promise to do my best to find the solution and make the marina life a little easier for everyone.

**EMAILING STATEMENTS:** Thank you to everyone who returned the customer update sheet or emailed me your information. I still need about 2/3 of the tenants to return their sheet to me. I am working on some computer glitches, but I should start emailing statements and newsletter by next month. It is imperative that you give me an updated email address to receive the statements and newsletters. The main goal is to go paperless and save a few trees! Please email me at [jleto@charlestonharborresort.com](mailto:jleto@charlestonharborresort.com).

**SECURITY DEPOSIT:** I have been going through our security deposit report and matching it with our current tenants. It appears that some tenants were not billed for the security deposit. There will be a letter going out to those who are affected by this situation and how we will rectify it. If you have any questions, please call Jacque or Kelley. If you plan on departing the marina, please be sure to ask about your deposit.

**MONTHLY PAYMENTS/LATE FEES:** I want to reiterate that ALL dock fees are due the 1st of EVERY month, no matter what! By the 10th of every month we issue late fees. This is an ongoing issue with tenants not paying on time and then asking for the late fees to be removed. While I understand sometimes bills have gone out late, it still does not excuse bills not being paid on time every month. If you are in an annual 33 ft. slip which is \$495.05, or 40ft slip, which is \$589.00 (both fees include electric), your monthly bill is the same every month. For all other slips or contracts, the dockage rate is the same every month, plus metered electric. Late fees are applied once your account hits \$250.00 or more. Most electric bills will not exceed that amount and therefore you will not receive a late fee if you pay dockage fees by the 10th.

On that note, I want to wish everyone a Happy New Year and looking forward to another amazing year with all of you at the marina!

Charleston Harbor  
Marina  
24 Patriots Point Road  
Mount Pleasant, SC 29464  
[www.charlestonharborresort.com](http://www.charlestonharborresort.com)

**Important Phone Numbers**  
Director of Marina  
Operations  
Kelley Poe  
843-284-7065  
[kpoe@charlestonharborresort.com](mailto:kpoe@charlestonharborresort.com)

Dockmaster  
Todd Carter  
843-284-7061  
[tcarter@charlestonharborresort.com](mailto:tcarter@charlestonharborresort.com)

Marina Office  
Jacque Leto  
843-284-7062  
[jleto@charlestonharborresort.com](mailto:jleto@charlestonharborresort.com)

Marina Cell Number  
843-297-2949

**Business Office Hours**  
Mon thru Sat: 9 am-5 pm  
Sunday: 9 am-1 pm

**Billing Office Hours**  
Mon thru Fri: 9 am-5 pm  
Saturday: 9 am-1 pm  
Sunday: CLOSED

## A NOTE FROM THE MARINA DIRECTOR...

Happy New Year to all at Charleston Harbor Marina. As we welcome in the new year, I wanted to bring up several points that need to be addressed. First and foremost, we are getting out of control again with our bikes. I counted 67 on the morning of the 30<sup>th</sup>, and only 31 have stickers. As I mentioned before, the resort is not a holding facility for bikes. If you are a Live Aboard, you are allowed to keep your bike on property. That would mean 24 total bikes on the racks on any given day. I am fine with you leaving your bikes on the racks while you are here, but you need to take them with you when you depart or place them on or in your vessel. That also leads into my next point. Docks and finger piers are supposed to remain free of clutter and debris. I have noticed an increase in the amount of personal items on or near boats on the finger piers. You are allowed a dock box to stow your extra gear. **I will be cutting locks and removing bikes on January 15<sup>th</sup>.** I will also put warnings on boats for those of you who do not remove excess personal belongings from finger piers. After one warning, I will be removing those items myself. Other than these two items, I believe that as a whole, we are moving forward in a very positive way. We have two more Oyster Roasts (January and February), and as always, you can stop by the office to pick up an events sheet for the week. Looking forward to seeing all of you in 2015, and to further advancing the welfare of the marina and our tenant family.

Thanks,  
Kelley