

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

**APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS**

IN CASE NO. 2009-CP-1000685, THE HONORABLE MIKELL R. SCARBOROUGH

Case No. 2014-001345

CHARLESTON HARBOR RESORT & MARINA.....Respondent,

v.

PAUL DAVIS.....Appellant.

**RESPONDENT'S REPLY
TO APPELLANT'S RETURN TO
RESPONDENT'S MOTION TO DISMISS THE APPEAL**

This Reply is filed as a result of the Appellant's continued failure to comply with the Court's Order regarding the filing of the record on appeal and the Appellant's continued and repeated delay tactics. Respondent filed a Motion to Dismiss the Appeal on February 17, 2015, after Appellant failed to provide the record on appeal as required by the Court's Order dated January 29, 2015. The Appellant submitted a letter to the Court on February 18, 2015, stating that he would file the record on appeal within ten (10) days. Subsequently, on February 23, 2015, the Appellant filed a Return to Respondent's Motion to Dismiss the Appeal, asking that the Court not dismiss the appeal as a result of the failure to produce the record on appeal within the time required by the Court.

The Appellant still has not submitted the record on appeal. Respondent requests the

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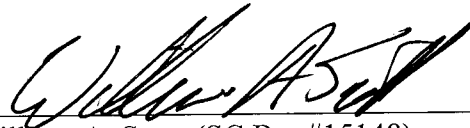
MAR 17 2015

SC Court of Appeals

Court to dismiss the Appeal as a result of the Appellant's repeated failure to comply with the Court's Order and deadlines for the appeal.

Respectfully submitted.

PEDERSEN & SCOTT, P.C.



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ATTORNEY FOR RESPONDENT

Dated this 13th day of March, 2015

THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

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v.

PAUL DAVIS.....Appellant.

PROOF OF SERVICE

I certify that I have served the **Respondent's Reply to Appellant's Return to Respondent's Motion for Dismiss the Appeal**, by depositing a copy of it in the United States Mail, postage prepaid, on March 13, 2015, addressed to Pro Se Appellant Paul Davis, 14639 C.R. Koon Highway, Newberry, SC 29109 and Paul Davis, 107 Averill Lane, Irmo, SC 29063.

PEDERSEN & SCOTT, P.C.


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ATTORNEY FOR RESPONDENT

Dated this 13th day of March, 2015

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March 13, 2015

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

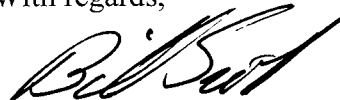
RE: Paul Davis v. Charleston Harbor Resort & Marina
Case No. 2009-CP-1000685
Appeals Court No.: 2014-001345

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the *Respondent's Reply to Appellant's Return to Respondent's Motion to Dismiss the Appeal and Proof of Service*. Please return a stamped-in copy of these documents in the enclosed envelope.

Please contact me if you have any questions.

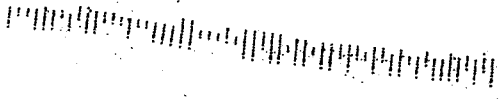
With regards,



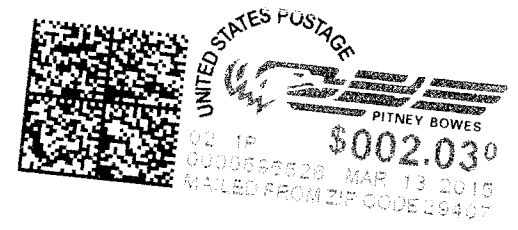
William A. Scott

WAS/teb
Enclosures
cc: Paul Davis
Charleston Harbor Resort & Marina

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SC Court of Appeals



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