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Appeal from Chester County
Court of Common Pleas
Brian M. Gibbons, Circuit Court Judge

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AUG 10 2015

SC Court of Appeals

2015-CP-12-0179

Appellate Case No. 2015-001036

Robert H. Breakfield, as attorney in fact for John D. Hinson,
John C. Hinson, Jerry Hinson, Kathy Huffstickle, Robert H. Hinson,
Darrell W. Hinson, Lois Hinson, Tina Jones, George Stanford
as Personal Representative of the Estate of Linda Stanford,
William L. Hinson, Elaine H. Hensley, and
William C. Hinson, Jr. Respondent,

v.

Mell Woods Appellant.

Respondent's Motion to Supplement Reply to Appellant's Return to
Respondent's Motion for Sanctions

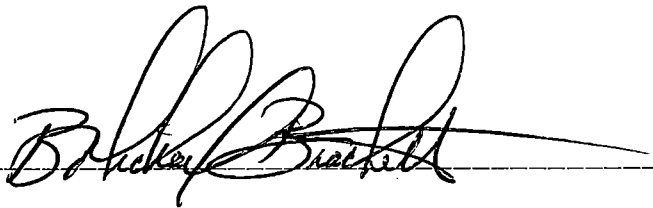
By Order dated June 25, 2015, this Court dismissed Appellant's frivolous appeal because the order purportedly being appealed was not a final order. Appellant then filed a frivolous Petition for Rehearing. Respondent filed a Return to the Petition for Rehearing and an accompanying Motion for Sanctions in an effort to bring Appellant's abusive litigation to an end. Appellant filed and served a Return to the Motion for Sanctions on July 30, 2015. Respondent's Reply was served on August 3, 2015.

Respondent moves to supplement his Motion for Sanctions with a filing made by the Appellant on or about August 4, 2015. The grounds are as follows: on August 4, 2015, Appellant, again acting pro se, served an "Application for Change of Venue," including Appellant's supporting affidavit, in the underlying trespass proceeding in Magistrate's Court. (Attached as Exhibit A.) It is the Magistrate's Court's Order dated March 27, 2015 that found the Appellant to be a trespasser that is the subject of the above-captioned appeal. No change of venue motion was presented to the Magistrate's Court prior to the January 30, 2015 hearing or the March 27, 2015 Judgment Order.

The attached Application serves to further demonstrate Appellant's abuse of the court. It is frivolous; it is untimely; it purports to commence another proceeding that will result in a decision/order that Appellant can use to start another delay by pursuing a motion for reconsideration, appeal to circuit court, petition for rehearing/reconsideration; appeal to the court of appeals, petition for rehearing, and petition for writ of certiorari. All the while occupying land owned by the Respondents whose ownership has been confirmed by this Court in 2014-UP-010.

Notwithstanding the history of Appellant's incessant litigation reviewed in Respondent's motion for sanctions, Appellant's affidavit dated August 4, 2015 in support of his attached Application for Change of Venue again shows for all to see that Appellant continues to ignore prior court decisions and to persist with his claim to title to Respondent's land. (Exhibit A, Affidavit, ¶ 5 ["trying to evict affiant from land which affiant owns"]; and ¶ 9 [claiming adverse possession even though adverse possession was decided unfavorably to Appellant in 2014-UP-010]).

Exhibit A shows exactly why sanctions are needed and why Respondent's motion for sanctions should be granted. Respondent and his principals are entitled to the protection of the courts to put an end to Appellant's mischief and its attendant delays and expense.

A handwritten signature in black ink, appearing to read "B. Michael Brackett", written over a horizontal dashed line.

B. Michael Brackett # 838
Adam T. Silvernail
Moses & Brackett, PC
P.O. Box 100261
Columbia, SC 29202
803.461.2312
Attorneys for Respondent Breakfield

August 7, 2015

STATE OF SOUTH CAROLINA
County of Chester

In The Magistrate Court

2014 CV 12 104 00037

Robert H. Breakfield,

Plaintiff,

v.

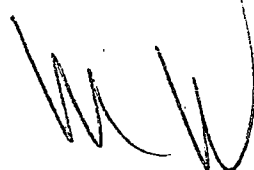
Mell Woods.

Defendant.

APPLICATION FOR CHANGE OF VENUE, AND TWO DAYS NOTICE TO
ADVERSE PARTY, South Carolina Statute § 22-3-920:

Defendant Mell Woods comes now and makes application for
the one-time change of venue allowed by SC § 22-3-920.

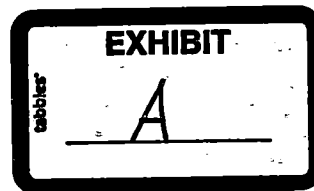
Grounds for the change of venue are stated in the attached
affidavit; in addition this case has been materially
changed by the fact that there is a partition action among
the parties for the possession of the same land; defendant
has applied to be a defendant in the partition action,
defendant learned of the pending partition action one month
ago.



Mell Woods

P.O. Box 2603
Lancaster, SC 29721

-/-



STATE OF SOUTH CAROLINA
County of Chester

In The Magistrate Court

2014 CV 12 104 00037

Robert H. Breakfield,

Plaintiff,

v.

Mell Woods.

Defendant.

State of South Carolina, Chester County:

AFFIDAVIT

First being duly sworn, affiant Mell Woods deposes and states the following facts on oath:

(1) Bad feelings have existed for some time between affiant and Magistrate Yale Zamore;

(2) Yale Zamore refuses to do the things he is required by statute to do, but instead will only do what the plaintiff attorney B. Michael Brackett tells Judge Zamore to do;

(3) Over the last four years Magistrate Yale Zamore, through intimidation, has extracted nearly ten thousand dollars from affiant and affiant recently sent Judge Zamore a demand letter demanding the return of the nearly \$10,000.00 in cash;

(4) Each day affiant lives in fear that Judge Zamore will extract revenge because affiant demanded the return of affiant's monies which do not belong to Judge Zamore;

(5) For the last four years B. Michael Brackett and Judge Zamore have been trying to evict affiant from land which affiant owns, first Brackett called affiant a "tenant" which did not work fast enough, so then Brackett and Zamore started calling affiant a "trespasser" which is the now current label even though affiant is present on the land under a duly recorded mortgage from the former possessor of the land in question;

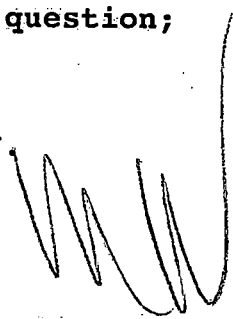
(6) On August 04, 2015, affiant received the latest court order from Judge Zamore about the current state of affairs, in the order on page two is the following statement by Zamore: *"and given the Defendant's apparent penchant for appealing any and all rulings and Orders adverse to his position,"* affiant swears that Judge Zamore does not want anything appealed and in fact will take out revenge on any party who does appeal, example it has been fours months since affiant *timely* appealed Zamore's last ruling, and Judge Zamore has yet to send the required return to the circuit court;

(7) Affiant filed an answer, and a \$100.00 cost bond when responding to the "notice to quit" filed in this case, and a demand for a jury trial, all of which were ignored by Judge Zamore, while Zamore continued to extract \$200.00 per month, every month out of affiant;

(8) It does not do any good whatsoever to cite South Carolina case law and Statutes to Judge Zamore, Judge Zamore does not care to read, and has never gone by the law in this case;

(9) On May 08, 2015 affiant completed ten years adverse possession of the land in question;

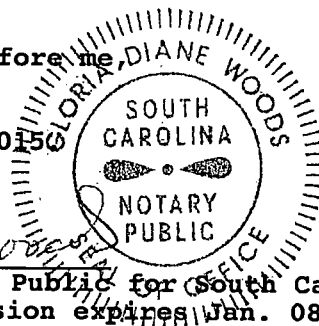
AFFIANT HAS NOTHING FURTHER TO SAY.



Mell Woods

Sworn to and subscribed before me

This 04 day of August, 2015



Gloria Diane Woods

Gloria Diane Woods, Notary Public for South Carolina
Commission expires Jan. 08, 2018.

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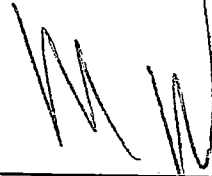
AUG 10 2015

SC Court of Appeals

CERTIFICATE OF SERVICE

I hereby certify that I have served the adverse party,
(parties) with a copy of the within and foregoing
application, and affidavit, by placing the same in the
U. S. Mail, with sufficient postage.

This 04 day of August, 2015.



Mell Woods

P.O. Box 2603
Lancaster, SC 29721

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Chester County
Court of Common Pleas
Brian M. Gibbons, Circuit Court Judge

2015-CP-12-0179

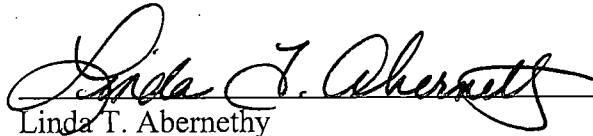
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Certificate of Service

I, Linda T. Abernethy, Legal Assistant to B. Michael Brackett, Esquire, attorney for the Respondent in the above-captioned matter, do hereby certify that I have served the pro se Appellant, Mell Woods, with a copy of Respondent's Motion to Supplement Reply to Appellant's Return to Respondent's Motion for Sanctions, postage prepaid and return address clearly indicated on said envelope, on this 7th day of August, 2015 at the following address:

Mell Woods
P. O. Box 2603
Lancaster, SC 29721


Linda T. Abernethy