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

**RECEIVED**  
SEP 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 Further Supplement Reply to Appellant's Return to  
Respondent's Motion for Sanctions

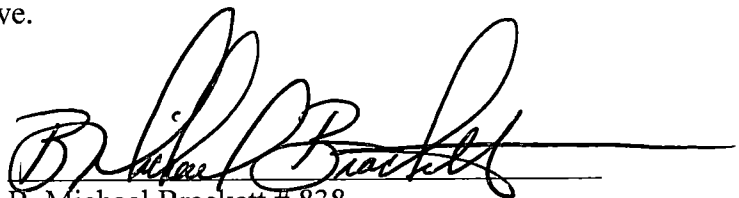
By Order dated June 25, 2015, this Court dismissed Appellant's frivolous appeal because the order purportedly being appealed was not a final order. Appellant then filed a frivolous Petition for Rehearing. Respondent filed a Return to the Petition for Rehearing and an accompanying Motion for Sanctions 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.

On or about August 7, 2015 the undersigned moved to supplement the motion for sanctions with a filing made by the Appellant on or about August 4, 2015. The filing was Appellant's "Application for Change of Venue," including Appellant's supporting affidavit, in the underlying trespass proceeding in Magistrate's Court. Respondent's Motion to Supplement Reply to Appellant's Return to Respondent's Motion for Sanctions, dated August 7, 2015 is incorporated herein by reference.

Respondent now moves again to further supplement the record with respect to the pending motion for sanctions. Attached and incorporated herein is a filing made by York, SC attorney Daniel D'Agostino in case no. 2008-CP-12-00475. This is a partition action involving the members of the Hinson family. The land to be partitioned includes the residential lot that Appellant Mell Woods claims title to, and still occupies, but which the courts, most notably this Court, has ruled that Appellant Woods has no title to or legal interest in.

Appellant Woods continues to harass the Hinson family with his pro se court filings, resulting in his continued occupancy of /trespass on land he does not own.

The requested sanctions are imperative.

A handwritten signature in black ink, appearing to read "B. Michael Brackett", is written over a horizontal line. The signature is stylized and cursive.

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

September 8, 2015



D'AGOSTINO  
LAW FIRM

Daniel D. D'Agostino | Jacqueline N. Davis  
25 West Liberty Street  
York, South Carolina 29745  
Phone 803.628.6509 | Fax 803.628.7990  
www.dagostinolawyers.com

September 2, 2015

Chester Clerk of Court  
P.O. Box 580  
Chester, South Carolina 29706

RE: Robert H. Hinson, et al. v. Lois H. Griffin, et al.

Dear Sir/Madam:

Enclosed please find Defendant Kathy Huffstickle's Reply to Applicant's Motion to Intervene along with a Certificate of Service for the same. Please return filed copies to me in the enclosed envelope.

By copy of this letter, I am serving the Reply on Defendants and Mell Woods.

With kind regards, I am,

Sincerely yours,

Daniel D. D'Agostino

DDD/krm  
Enclosure

cc: B. Michael Brackett  
Ned Gregory, II  
Bruce M. Poore  
Steedley Bogan  
Milton Hamilton  
Mell Woods

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SC Court of Appeals

STATE OF SOUTH CAROLINA )  
)  
COUNTY OF CHESTER )  
)  
Robert H. Hinson, William Calvin Hinson, )  
Jr., Charles Jerry Hinson, Elaine H. )  
Hensley, and Linda K. Stanford and )  
William Levy Hinson, )  
)  
Plaintiffs, )  
)  
vs. )  
)  
Lois H. Griffin, Christine G. Jones as )  
Trustee of the Lois H. Griffin Living Trust, )  
J. C. Hinson, Kathy Huffstickle, John )  
Daniel Hinson and Darrell Wayne Hinson, )  
)  
Defendants )  
)

IN THE COURT OF COMMON PLEAS

C.A. No.: 2008-CP-12-00475

**DEFENDANT KATHY HUFFSTICKLE'S  
REPLY TO APPLICANT'S MOTION TO  
INTERVENE**

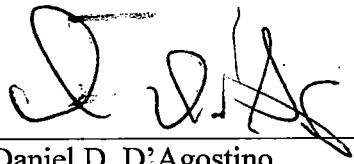
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The Defendant Kathy Huffstickle objects to Mell Woods being added as a party and requests the court to deny his request. Woods is barred from intervening in this action. Woods made a claim for title to the property through the theory of adverse possession and has lost that claim after appealing the issue through to the S.C. Supreme Court. Counsel of the personal representation of the Estate has filed a motion to sanction Woods for his frivolous litigation and requested that he be required to have an attorney to file any further actions. The undersigned requests Woods' request to intervene be denied. Woods is barred by the doctrine of collateral estoppel and res judicata from attempting to intervene as the Court has denied his claim for title. Any claims for title he had would have been compulsory claims in the prior action.

September 1, 2015

  
\_\_\_\_\_  
Daniel D. D'Agostino  
D'Agostino Law Firm  
25 W. Liberty St.  
York, SC 29745  
803-628-6509  
803-628-7990 (Facsimile)  
Attorney for Respondent

STATE OF SOUTH CAROLINA )  
)  
COUNTY OF CHESTER )  
)  
Robert H. Hinson, William Calvin Hinson, )  
Jr., Charles Jerry Hinson, Elaine H. )  
Hensley, and Linda K. Stanford and )  
William Levy Hinson, )  
)  
Plaintiffs, )  
)  
vs. )  
)  
Lois H. Griffin, Christine G. Jones as )  
Trustee of the Lois H. Griffin Living Trust, )  
J. C. Hinson, Kathy Huffstickle, John )  
Daniel Hinson and Darrell Wayne Hinson, )  
)  
Defendants )  
)

IN THE COURT OF COMMON PLEAS

C.A. No.: 2008-CP-12-00475

**CERTIFICATE OF SERVICE**

**RECEIVED**

SEP 10 2015

SC Court of Appeals

The undersigned hereby certifies that a copy of the **DEFENDANT KATHY HUFFSTICKLE'S REPLY TO APPLICANT'S MOTION TO INTERVENE** in the above-captioned case, along with a copy of this **CERTIFICATE OF SERVICE**, have been furnished to:

B. Michael Brackett  
Adam T. Silvernail  
Moses & Brackett, PC  
P.O. Box 100261  
Columbia, SC 29202

Bruce M. Poore  
P.O. Box 11808  
Rock Hill, SC 29731


Milton Hamilton  
P.O. Drawer 808  
Chester, SC 29706-0808

Ned Gregory, II  
210 W. Meeting St.  
Lancaster, SC 29720

Stedley Bogan  
1320 Washington St.  
First Floor  
Columbia, SC 29201-3312

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

by depositing copies thereof in the U.S. Mail, postage-paid, in an envelope securely sealed, on September 2, 2015.

  
\_\_\_\_\_  
Daniel D. D'Agostino  
D'Agostino Law Firm  
25 W. Liberty St.  
York, SC 29745  
803-628-6509  
Attorney for Respondent Huffstickle

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Chester County  
Court of Common Pleas  
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2015-CP-12-0179

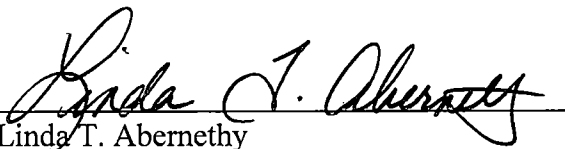
Appellate Case No. 2015-001036

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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 Further Supplement Reply to Appellant's Return to Respondent's Motion for Sanctions, postage prepaid and return address clearly indicated on said envelope, on this 8th day of September, 2015 at the following address:

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

  
Linda T. Abernethy

# MOSES & BRACKETT, PC

ATTORNEYS AND COUNSELORS AT LAW

1333 Main Street, Suite 260 (29201)  
Post Office Box 100261  
Columbia, South Carolina 29202-3261

Telephone (803) 461-2300  
Facsimile (803) 461-2309

B. Michael Brackett, of Counsel  
Direct Dial: (803) 461-2312  
Email: mbrackett@mkb-law.com

September 8, 2015

**RECEIVED**

SEP 10 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Breakfield, as Attorney-in-Fact v Woods  
Trial Court Case No. 2015-CP-12-0179  
Appellate Case No. 2015-001036  
Our File No. 12085.3


Dear Ms. Kitchings:

Enclosed for filing please find the original (unbound) and six copies of Respondent's Motion to Further Supplement Reply to Appellant's Return to Respondent's Motion for Sanctions. My check in the amount of \$25.00 is enclosed for the motion fee. Also enclosed for filing is the customary Certificate of Service.

By copy of this letter, I am serving a copy of the enclosed Motion on Appellant who is pro se.

Please return a clocked copy of the face page of the Motion using the envelope enclosed.

Very truly yours,

  
B. Michael Brackett

BMB/lta  
Enclosures

cc. Robert H. Breakfield, Esquire  
Mell Woods

**MOSES & BRACKETT, PC**  
Attorneys & Counselors-At-Law  
P.O. Box 100261  
Columbia, SC 29202-3261

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

