

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

THE HOUSING AUTHORITY OF THE CITY
OF CHARLESTON,

Plaintiff - Respondent,

vs.

KOEBY K. WILLIAMSON,

Defendants - Appellant.

SOUTH CAROLINA COURT OF
APPEALS

CASE NO.: 2015-001714

THE HOUSING AUTHORITY OF
THE CITY OF CHARLESTON'S
MEMORANDUM IN OPPOSITION
TO MOTION TO ORDER
TRANSCRIPT AFTER DEADLINE

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OCT 07 2015

SC Court of Appeals

COMES NOW, Plaintiff - Respondent The Housing Authority of the City of Charleston, by and through its counsel of record, THEODORE PARKER, III, ESQ. and JACQUELINE DIXON PHILLIPS, ESQ., of the law firm of PARKER NELSON & ASSOCIATES, CHTD., and hereby files this memorandum in opposition to Appellant's Motion to Order Transcript After Deadline.

Appellant's grounds for his motion are not sufficient for the Court to grant his request. Appellant argues that because he is pro se, he was unaware of the Rules governing the appeals process. Mr. Williamson took it upon himself to file this appeal and represent himself, and he should therefore have undertaken to familiarize himself with the applicable rules at that time. He also argues that he is disabled and receives no benefits and had to get a loan in order to pay for the transcript. Again, Appellant should have familiarized himself with the applicable rules prior to filing his appeal and obtained the necessary funds to do so in a timely manner.

Based on the foregoing, Appellant's motion should not be granted and his appeal should be dismissed.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

DATED this 21st day of September, 2015.

PARKER NELSON & ASSOCIATES, CHTD.

Myna V. Whitman for JDP
Theodore Parker, III, Esq.
Jacqueline Dixon Phillips, Esq.
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Charleston, SC 29401
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Email: jdixon@pnlaw.net

*Attorneys for Plaintiff - Respondent,
The Housing Authority of the City of Charleston*

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of September, 2015, served a copy of **THE HOUSING AUTHORITY OF THE CITY OF CHARLESTON'S MEMORANDUM IN OPPOSITION TO MOTION TO ORDER TRANSCRIPT AFTER DEADLINE**, enclosed herein, upon all parties to these matters by delivering a true copy of same via U.S. Mail, addressed as follows:

Koebv K. Williams
1338 B Ashley Avenue
Charleston, SC 29405
(843) 276-2084
Defendant-Appellant Pro Se

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Alisa Ruiz

An employee of PARKER NELSON & ASSOCIATES, CHTD.

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E-3) NO ANSWER
E-5) MAIL SIZE OVER

E-2) BUSY
E-4) NO FACSIMILE CONNECTION

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September 21, 2015

VIA FACSIMILE (803) 734-1839
AND U.S. MAIL

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

Re: The Housing Authority of the City of Charleston v. Koeby K. Williamson
Case No.: 2015-001714

Dear Clerk of the Court:

Enclosed for filing please find the original and six (6) copies of The Housing Authority of the City of Charleston's Memorandum in Opposition to Motion to Order Transcript After Deadline in the above-referenced matter. Please file the document and return a file-stamped copy to our office in the self-addressed stamped envelope provided for your convenience.

Thank you in advance for your prompt attention to this matter. Should you have any questions, please feel free to contact our office.

Sincerely,

PARKER NELSON & ASSOCIATES, CHTD.

Eloisa Nuñez, Legal Assistant to
Theodore Parker, III, Esq. and
Jacqueline Dixon Phillips, Esq.

/en
Enclosures

cc: Koeby K. Williamson

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Sincerely,

PARKER NELSON & ASSOCIATES, CHTD.

A handwritten signature in black ink that reads 'Eloisa Nuñez'.

Eloisa Nuñez, Legal Assistant to
Theodore Parker, III, Esq. and
Jacqueline Dixon Phillips, Esq.

/en
Enclosures

cc: Koeby K. Williamson

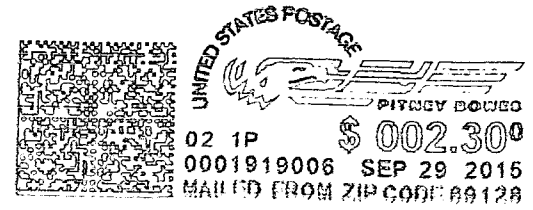
K:\Personal Directories\PARKER\CC\HAWilliamson\cc\Lit to Clerk re Memo in Opps 9.21.15.wpd

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