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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master-in-Equity

CASE NO. 2014-001747

JOSEPH C. SUN **Appellant**

v.

MARSHALL L. HORTON **Respondents**
and RICHARD ULBRICH

MOTION TO FILE RECORD ON APPEAL, FINAL BRIEF
AND FINAL REPLY BRIEF AS IS WITHOUT THE BINDINGS
AND COVERS AND WITH FEWER COPIES AS
REQUIRED BY RULE 267(d), SCACR


Appellant Joseph Sun received several letters from the court regarding certain deficiencies noted under the South Carolina Court Rules (SCACR) on the papers he sent in for filing in this case. Appellant moves the court for leave to file the Record on Appeal, his Final Brief and Final Reply Brief as is without the bindings or covers and with fewer copies as required by Rule 267(d), SCACR because Appellant is appearing pro se without the benefit of counsel due to his lack of funds in his retirement when he only has a small Social Security check every month as his only income.

Appellant has been approved by the court in another case to file briefs and other papers without bindings and covers and with fewer copies as he has little means to prepare his legal

papers for filing. Appellant has sent in six (6) copies of all the aforesaid documents for filing.

This 6h day of October, 2015.

Respectfully submitted,


JOSEPH C. SUN, pro se
P. O. Box 151
Bluffton, SC 29910
843-226-8788

PROOF OF SERVICE

I certify that I have this date served the Appellant's Motion to File Record on Appeal, Final Brief and Final Reply Brief as is Without the bindings and Covers and With Fewer Copies as required by Rule 267(d), SCACR, on Respondents Horton and Ulbrich by depositing a copy of same in the U.S. Mail postage prepaid, on October 6, 2015 addressed to their attorneys on record:

Gregory Michael Galvin, Esq.
Attorney for Marshall Horton
P.O. Box 887
Bluffton, SC 29910

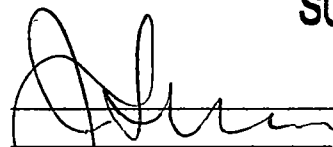
Lindsay Y. Goodman, Esq.
49 Boundary Stree, 2nd Fl.
P. O. Box 3766
Bluffton, SC 29910

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SC Court of Appeals

This 6th day of October, 2015



JOSEPH SUN

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**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas**

Marvin H. Dukes, III, Master-in-Equity

CASE NO. 2014-001747

JOSEPH C. SUN Appellant

v.

**MARSHALL L. HORTON Respondents
and RICHARD ULBRICH**

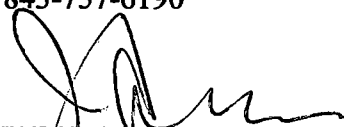
PROOF OF SERVICE

This is to certify that I have served the Record on appeal, Appellant's Final Brief and Final Reply Brief by depositing a copy of them in the United States Mail to the respondents, postage prepaid on October 7, 2015, addressed to their counsels of record [by personally delivering a copy of them to their counsels of record] at:

Gregory Michael Galvin, Esq.
Attorney for Marshall Horton
P.O. Box 887
Bluffton, SC 29910
843-227-2231

Lindsay Y. Goodman, Esq
49 Boundary Street, 2nd Fl.
P. O. Box 3766
Bluffton, SC 29910
843-757-6190

October 7, 2015.



JOSEPH C. SUN, pro se
P. O. Box 151
Bluffton, SC 29910
843-226-8788

P. O. Box 151
Bluffton, SC 29910
October 7, 2015

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SC Court of Appeals

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

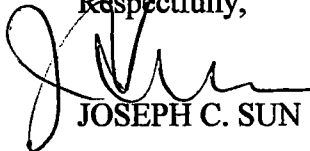
Re: Sun v. Horton, et al, Appeal Case No. 2014-001747
Beaufort County Court of Common Pleas 2014-CP-07-00238

Gentlemen:

Enclosed please find a Money Order of \$25.00 and the Motion to File Record on Appeal, Final Brief and Final Reply Brief as is, and the Proof of Service of the aforesaid document sent in for filing previously.

As to the Certificates of Counsel on the aforesaid documents, they were all included in the two briefs and Record on Appeal as part of the documents. Copies of them are enclosed. Please let me know if there is any other deficiency.

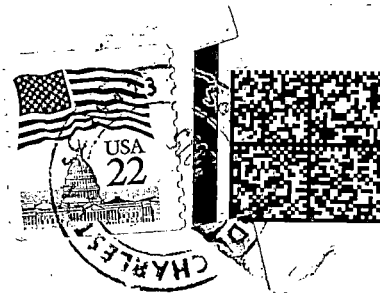
Thank you for your assistance and cooperation.

Respectfully,

JOSEPH C. SUN

cc: Greg Galvin, Esq.
Lindsay Goodman, Esq.

Enclosures: Motion and copies
Money Order \$25.00

J. C. Sun
P. O. Box 151
Bluffton, SC 29910



U.S. POSTAGE
\$.49

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