

# MOSES & BRACKETT, PC

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January 15, 2016

VIA Email and U.S. Mail

Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
P.O. Box 11330  
Columbia, SC 29211

**RECEIVED**

JAN 19 2016

**S.C. SUPREME COURT**

Re: Breakfield, as Attorney-in-Fact v. Woods  
Supreme Court Case No. 2015-002318  
Our File Number - 12085.3

Dear Mr. Shearouse:

My motion to dismiss Mr. Woods' petition for certiorari and my accompanying motion for sanctions were filed and served on December 29, 2015. Mr. Woods' ten-day deadline for serving a return to the motions, pursuant to Rule 240(e), SCACR, was Friday, January 8, 2016.

I received in today's mail Mr. Woods' Rule 240(e) Return with a Certificate of Service representing to the Court that the Return was served by mail on January 8, 2016. I understand from Ms. Matthews in your office that the Return sent to the Court for filing was received earlier this week.

Enclosed is a copy of the Postal Service label on the package that transmitted the Return to me on which the tracking number is shown. Also enclosed is the U.S. Postal Service tracking report for said tracking number. This report shows that the mailing label was purchased on January 8, 2016 but the package was not placed with the post office until Wednesday, January 13, 2016.

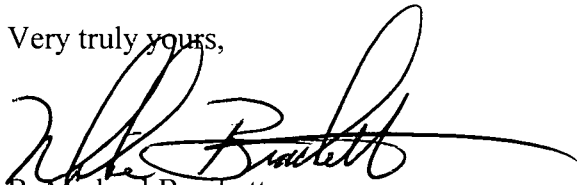
This mischief was called to the Court's attention in previous cases; Sup. Ct. case no. 2014-01246 and Sup. Ct. case no 2014-01039. [See your letters to Mr. Woods in each of those matters dated July 11, 2014]. When Mr. Woods moved to reinstate those appeals, I filed and served Returns that included affidavits from a Postal Service manager explaining what Mr. Woods had done with respect to misrepresenting the actual date of service.

What we have herein is exactly the same. It is another example of how Mr. Woods makes misrepresentations to the Court, tries to delay legal proceedings, tries to reduce my response time and force my clients to incur time and expense in insuring that I have sufficient response time, create false issues to trigger appeals, and to extend his time living on property that he does not own. This latest untimely filing and/or service of the Return only serves to bolster Respondents' pending motion for sanctions.

I am unable to communicate with Mr. Woods by email or fax. He either does not have such service, or he has chosen not to communicate an email address or fax number to me or to the Court. By copy of this letter, I am mailing a copy of this letter, with enclosures, to Mr. Woods at his Lancaster, SC post office box.

If you require a formal Reply to the Return please so advise.

Very truly yours,






B. Michael Brackett

Enclosures

cc: Robert H. Breakfield, Esquire (U.S. Mail)  
Mell Woods (U.S. Mail)  
Ms. Lindsey Matthews (email)

**PRIORITY MAIL**

TRA  
★  
INSU

 <b>UNITED STATES POSTAL SERVICE®</b>		<b>Click-N-Ship®</b>	
<b>P</b>	<small>usps.com</small>	9405 5036 9930 0237 0237 89 0053 2004 0222 9202	
	<b>\$5.32</b>	<b>US POSTAGE</b>	
	<small>Regional Box A</small>		
		<b>Commercial Base Pricing</b>	
<small>01/08/16</small>	<small>4 lb 2 oz</small>	<small>Mailed from 29721</small>	<small>062S0000000311</small>
<b>PRIORITY MAIL 2-DAY™</b>			
MELL WOODS PO BOX 2603 LANCASTER SC 29721-2603		Expected Delivery Date: 01/11/16 <b>0024</b>	
Carrier -- Leave if No Response			<b>B099</b>
SHIP TO: B. MICHAEL BRACKETT MOSES & BRACKETT, PC PO BOX 100261 COLUMBIA SC 29202-3261			
<b>USPS TRACKING #</b>			
			
<b>9405 5036 9930 0237 0237 89</b>			
Electronic Rate Approved #038555749			

**BOX A**  
INTERNATIONAL

RRB-A2: July 2013  
ID: 10.9375 x 2.375 x 12  
OD: 11.0625 x 2.15 x 13.0  
ODCUFT: 0.209062

**UNITED STATES POSTAL SERVICE**



# USPS Tracking®



Customer Service ›  
Have questions? We're here to help.



Get Easy Tracking Updates ›  
Sign up for My USPS.

Tracking Number: 940550369930 0237023789



## Delivered

On Time  
Expected Delivery Day: Friday, January 15, 2016

### Product & Tracking Information

Postal Product: Priority Mail 2-Day™  
Features: USPS Tracking™  
Up to \$50 insurance included  
Restrictions Apply

### Available Actions

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
January 15, 2016, 6:29 am	Delivered, PO Box	COLUMBIA, SC 29202
Your item has been delivered and is available at a PO Box at 6:29 am on January 15, 2016 in COLUMBIA, SC 29202.		
January 15, 2016, 6:27 am	Arrived at Post Office	WEST COLUMBIA, SC 29172
January 15, 2016, 4:59 am	Arrived at USPS Destination Facility	COLUMBIA, SC 29201
January 14, 2016, 1:01 am	Departed USPS Facility	CHARLOTTE, NC 28214
January 13, 2016, 10:14 pm	Arrived at USPS Facility	CHARLOTTE, NC 28214
January 13, 2016, 8:59 pm	Accepted at USPS Origin Sort Facility	LANCASTER, SC 29721
January 8, 2016	Pre-Shipment Info Sent to USPS	

### Track Another Package

Tracking (or receipt) number

9405503699300237023789

Track It

### Manage Incoming Packages

Track all your packages from a dashboard.  
No tracking numbers necessary.

Sign up for My USPS

