

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

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

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.

RECEIVED

JAN 15 2016

SC SUPREME COURT

Page 2

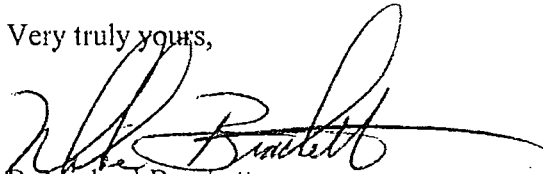
January 15, 2016

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

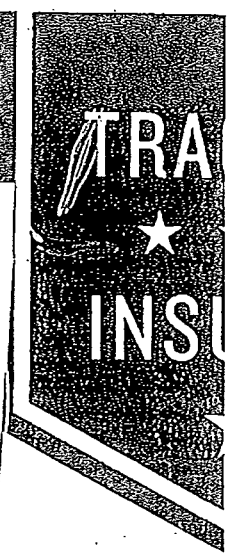
cc: Robert H. Breakfield, Esquire (U.S. Mail)
Mell Woods (U.S. Mail)
Ms. Lindsey Matthews (email)

PRIORITY MAIL




RECEIVED

JAN 15 2016

SC SUPREME COURT



BOX A
INTERNATIONAL

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

RRB-A2, July 2013
ID: 10.9375 x 2.375 x .12
OD: 11.0625 x 2.5 x 13.0
ODCUFT: 0.209062



English Customer Service USPS Mobile

Register / Sign In



USPS Tracking®

RECEIVED

JAN 15 2016

SC SUPREME COURT



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 29202 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 >



Matthews, Lindsey

From: Mike Brackett <MBrackett@mkb-law.com>
Sent: Friday, January 15, 2016 11:43 AM
To: Shearouse, Daniel
Cc: Matthews, Lindsey
Subject: Breakfield, as Attorney-in-Fact v. Woods 2015-002318
Attachments: Shearouse 1.15.16.pdf

Mr. Shearouse and Ms. Matthews,

Please see the attached letter, with enclosures. The original is being mailed today.

B. Michael "Mike" Brackett
Moses & Brackett, PC
Post Office Box 100261
1333 Main Street, Suite 650
Columbia, SC 29202-3261
803-461-2312 (direct dial)
803-461-2309 (fax)

Confidentiality Notice: This message (including any attachments) is intended exclusively for the individual or entity to which it is addressed. This message may contain information that is legally privileged, confidential or otherwise exempt from disclosure. If you are not the intended recipient, please note that any use, dissemination, distribution, or copying of this message is strictly prohibited and may be unlawful. Please notify the sender immediately by return email and delete all copies of this message.

IRS Circular 230 Notice: To ensure compliance with requirements imposed by the IRS, please note that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.