

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM SUMTER COUNTY
COURT OF COMMON PLEAS

RECEIVED
APR 11 2016
SC Court of Appeals

Hon. George C. James, Jr., Circuit Court Judge

Appellate Case No: 2015-002481

Charles Taylor,.....Appellant

v.

Stop "N" Save, Inc., d/b/a,
El Cheapo Plus #7 and Roy Rahal,.....Respondents

APPELLANT'S RETURN TO RESPONDENTS'

4-4-16 Letter Directed to the Clerk of Court

3-4-16 Letter Directed to the Clerk of Court

3-1-16 Letter Directed to the Clerk of Court

(1). That Appellant Charles Taylor, (hereinafter Appellant), respectfully hereby move to strike the above (Letters) in so far as they are intended to replace, such being in the proper form as required by the SCACR's re Motions, Returns, & Replies directed to

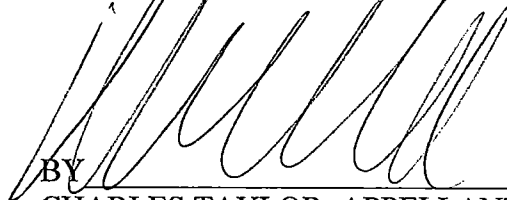
this Court for its proper consideration & ruling thereupon after careful review of such, instead of in letter form directed to the clerk of court seemingly for their consideration and rulings instead, and;

(2). That heretofore, Appellant saw no need to respond to such letters under the SCACRs for the said reasons, until they keep coming per the last one 4-4-16, seemingly hurrying the clerk &/ or the court into action, & seemingly so as to not allow Appellant the proper time to respond, if he wish, and;

(3). That when such letters are put into the proper form as required by the said rules & properly directed to this court, in a timely manner per the rules, Appellant believe he must then respond accordingly after being copied w/ same as provided for in the Motion, Return & Reply, Rules-and;

(4). That accordingly, Appellant move the court to strike said letters for said reasons & because such are not properly before the court, & Appellant prays that the strike is granted & so ordered.

RESPECTFULLY SUBMITTED



BY
CHARLES TAYLOR, APPELLANT
332 MYRTLE BEACH HIGHWAY
SUMTER SOUTH CAROLINA 29153
(803) 609-7990 APPELLANT PRO SE

Sumter, South Carolina, April 7, 2016

1. That the Record on Appeal, once filed with final briefs, after this court rules on the 2 pending motions before it; (*per Mrs. Amelia Smith of the clerk's office 4-5-16*); that record will then show the falsehoods of what Respd's are attempting (*via their 2-10-16 motion w/said letters*) in total to block appeal from ever being reviewed-fearing what it will show per Aplnt's initial & final briefs w/ ROA; for a preliminary flavor of what's feared *see* initial brief *esp.* p. 28 sec. 4 of 6 & record when file re the 12 false statements their own Resp'd Rahal admit under oath they made & sign for a defense;

2. **But in the meantime-Apln't deny what's in Respds' 2-10-16 motion with no proof & in said letters, except errs corrected in final filings &/or as explained in Apln's 2-22-16 return (reply) supported by Aplnt's 2-24-16 strike motion re the clean hand doctrine see p.5 para. 9 in aplnt's 2-22-16 return reply.**

3. That the Respondents are being so untruthful until it's unbelievable and indeed shameful and to show an example (*just 1*) of their most brazen of the falsehoods see exhibits A & B attached to show their own Resp'd Rahal saying the defense they advocates for him-it is not true-he swears under oath-ROA excerpt p. 200-201 attach & (see Rule 11 & sc 15-36-10); again; just 1 example why the full court press is on to get this appeal, briefs, ROA, struck or dismiss to obstruct or prevent appellate full review on the merits hence their said motion and letters, as the means to their ulterior motives.

4. To get a better view of their desperation to get this appeal dismiss see all the reasons in initial brief(s) of Appellant until final briefs with accompanying Record on Appeal are all filed.

5. **That the main issue at the heart of this appeal is re: in footnote 3 above re exhibits A & B attach; & all things being complained of in their said motion & letters are just decoys to fool this court as they successfully did the lower court, ref. Exhibit A & B attach until full briefs & ROA is file.**

EXHIBIT A p.4
w/ 4-6-16 Appeals Court
return of Appl't to Respsd'
letters directed to court clerk

1 BY MR. TAYLOR:

2 Q. I'll --

3 A. And, you know, I rented him the truck and
4 he left. Now, if he was sick, he wasn't sick, if
5 he's honest, he's not honest, I mean, how do I know?

6 Q. Good enough. And I'm just asking the
7 question and then get a quick answer and we'll move
8 on because a lot of them I expect you wouldn't know,
9 but I have to ask the question.

10 So if Reginald Morton said you did not
11 rent him the U-Haul truck on back -- 6-1-13, is he
12 lying? If -- if he said, "Well, Mr. Rahal didn't
13 rent me the truck," is he lying or is he telling the
14 truth?

15 MR. CULBREATH: Object to the form.

16 THE WITNESS: If he said he
17 doesn't -- he didn't rent the truck?

18 BY MR. TAYLOR:

19 Q. If he said you didn't rent him a truck, is
20 that the truth or you rented him a truck?

21 A. I rented him the truck.

22 Q. Okay. Good enough. Anyone else who say
23 and advocate the same story, in other words, if
24 anyone else say that you did not rent Reginald
25 Morton a truck, that is not the truth, is it?

EXHIBIT B p.5
Return of Appeal to Respc's
letters directed to court clerk
w/4-9-19 Appeals Court

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A. No.

Q. Okay. Okay. Now, let's see. Boy, my -- my head and back is killing me. It's about to bust. Okay. About the mail. Okay. Here is where we -- right here. No. 22. Okay. Here is where we are. No. 22. One here -- oh, I don't want to give you mine. I think you had already put a sticker on No. 22.

COURT REPORTER: Or I was going to take -- what do you want me to do --

MR. TAYLOR: Okay.

COURT REPORTER: -- with No. 22?

MR. TAYLOR: Let me see. Let me see that one.

COURT REPORTER: What you don't want marked I can cross out.

MR. TAYLOR: Okay. I know what it is. 22. That's 23. This is 22. And let's mark this 23. And this is 22. There we go. You got --

COURT REPORTER: Mark this as No. 22?

MR. TAYLOR: Yes. That's the actual -- here is the --

MR. CULBREATH: What's what?

MR. TAYLOR: Let -- let's use that one there. I'll keep --

ROA
p.201

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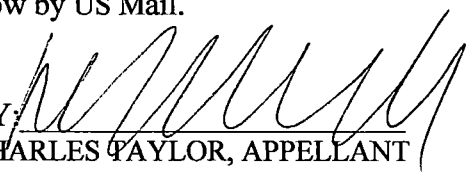
v.

Stop "N" Save, Inc., d/b/a,
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PROOF OF FILING AND SERVICE

Appellant certifies that he file (original + 6 copies) of his 4-6-16 return to the Respsd's
4-4-16, 3-4-16 & 3-1-16 Letters directed to the Clerk of Court & Apln't served same
to counsel at his address below by US Mail.

April 7, 2016

BY: 
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332 MYRTLE BEACH HIGHWAY
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(803) 609-7990

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Clerk of Court
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