

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SUMTER COUNTY  
Court Of Common Pleas

The Honorable George C. James, Jr., Judicial Circuit Court Judge of Appeals  
Case No.: 2012-CP-08-1801

RECEIVED  
APR 25 2016  
SC Court of Appeals

Appellate Case No. 2015-002481

Charles Taylor ..... Appellant,

v.

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

RESPONDENTS' RETURN TO APPELLANT'S  
SUPPLEMENTAL TO HIS PENDING MOTIONS

Gray T. Culbreath  
James. E. Brogdon, III  
Jessica A. Waller  
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Randy J. Soriano (*pro hac vice*)  
Julia Fenwick Ost (*pro hac vice*)  
Bryan Cave, LLP  
211 N. Broadway #3600  
St. Louis, Missouri 63102  
(314) 259-2000 (t)

ATTORNEYS FOR RESPONDENTS

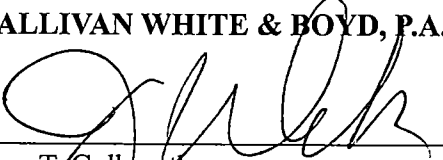
The Respondents, Stop "N" Save, Inc., d/b/a El Cheapo Plus #7 and Roy Rahal (hereinafter "Respondents"), by and through their undersigned counsel, hereby file their return pursuant to Rule 240(e), SCACR, to Appellant's Supplement to His Pending Motions.

By way of Appellant's supplement and correspondence to the undersigned, Appellant alternatively seeks dismissal of his Motion for Sanctions if Respondents' Motion to Dismiss or in the Alternative Strike is also dismissed. Respondents have denied Appellant's request (*See Ex. A*), and respectfully request this Court deny Appellant's alternative relief requested. Respondents adhere to the relief requested in their Motion to Dismiss or in the Alternative Strike and their Return to Appellant's Motion for Sanctions.

Respectfully submitted,

**GALLIVAN WHITE & BOYD, P.A.**

By:

  
\_\_\_\_\_  
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ATTORNEYS FOR RESPONDENTS

Columbia, South Carolina  
April 25, 2016.

# EXHIBIT A

GRAY T. CULBREATH  
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**Gallivan, White & Boyd, P.A.**  
— ATTORNEYS AT LAW —

April 20, 2016

Charles E. Taylor  
332 Myrtle Beach Hwy.  
Sumter, SC 29153

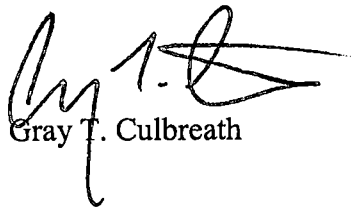
Re: *Charles Taylor, Appellant v. Stop 'N' Save, Inc., d/b/a El Cheapo Plus #7 and Roy Rahal,*  
*Respondents*  
Appellate Case No.: 2015-002481  
GWB File No.: 8566-1

Dear Mr. Taylor:

I am in receipt of your letter to Jessica Waller of my office dated April 15, 2016. Please be advised that we will not be dismissing our Motion to Dismiss or in the Alternative Strike.

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Gray T. Culbreath

GTC:lhs

THE STATE OF SOUTH CAROLINA  
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PROOF OF SERVICE

I, Laura Sabo, the undersigned employee of Gallivan, White & Boyd, P.A., attorneys for Respondents, hereby certify that on April 25, 2016, I served a copy of Respondents' RETURN TO APPELLANT'S SUPPLEMENTAL TO HIS PENDING MOTIONS, United States Mail, postage prepaid to the following:

Charles Taylor  
332 Myrtle Beach Highway  
Sumter, SC 29153  
*Pro Se Appellant*

  
\_\_\_\_\_  
Laura Sabo

April 25, 2016

JESSICA A. WALLER  
Direct Dial: 803.724.1722  
jwaller@gwblawfirm.com



**Gallivan, White & Boyd, P.A.**  
— ATTORNEYS AT LAW —

REPLY TO: Columbia Office  
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April 25, 2016

**VIA HAND-DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

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APR 25 2016  
SC Court of Appeals

Re: *Charles Taylor, Appellant v. Stop 'N' Save, Inc., d/b/a El Cheapo Plus #7 and Roy Rahal, Respondents*  
Appellate Case No.: 2015-002481  
GWB File No.: 8566-1

Dear Ms. Kitchings:

Enclosed for filing please find the original and eight (8) copies of Respondents' Return to Appellant's Supplemental to His Pending Motions. Please return two (2) clocked-in copies.

Should you have any questions, please do not hesitate to contact this office.

With kind regards, I am

Very truly yours,

GALLIVAN, WHITE & BOYD, P.A.

Jessica A. Waller

JAW/lhs

Enclosures

cc: Charles E. Taylor  
332 Myrtle Beach Hwy.  
Sumter, SC 29153