

Matter to be included in Record Of Appeal

Initial Brief Of Appellant

Letter From Chief Justice Toel regarding provision of interpreters for litigants that have LEP.

Statutes: S.C. Code Ann. Section 15-27-155

Other Authorities:

Rules Of Professional Conduct

[SCACR, 407, Rule 1.3: Diligence]

[SCACR, 407, Rule 1.1: Competence]

[SCACR. 407, Rule No: 201, Judicial Notice of Adjudicative Facts]

[SCACR, 407 - Rule 4.3, Dealing with Unrepresented Person]

[SCACR - 407 - Rules of Professional Conduct Specifically, Rule 1.0

(a) [6], Informed Consent]

Sub-Paragraph - Many of the Rules of Professional Conduct require that the lawyer obtained informed consent of a client before accepting or continuing representation OR PURSUING A COURSE OF CONDUCT.

Matter to be included

[Summons And Complaint, 2015-CP-23-03181, page 4, Item 4]

[Plaintiff's #1, Title To Real Estate, 11-4-2015, Page #2]

[Plaintiffs #2, Promissory Note, July 1st, 2013]

[Plaintiff's #2, Termination of Bond For Title]

[Plaintiff's #2, Termination Of Bond For Title, pg. 2, Item 3]

[Plaintiff's #3, Mortgage Of Real Property, 11-4-2015 - 2.7]

[Plaintiff's #3, Mortgage Of Real Property, 11-4-2015 - 3.1,3.2]

[Plaintiff's #3, Mortgage Of Real Property, 11-4-2015 - 4.5]

[Transcript(1), Hearing of November 4, 2013, 2015-CP-23-03181]

[Plaintiff's #3, Mortgage Of Real Property, 11-4-2015]

Refer to:

[Transcript(1), pg. 2, lines 21 - 25]

[Transcript(1), pg. 3, line 1]

[Transcript(1), pg. 3, lines 3 - 6]

[Transcript(1), pg. 3, lines 11-13]

Matter to be included

[Transcript(1), pg. 3, lines 16 - 19]

[Transcript(1), pg. 3, lines 21 - 25]

[Transcript(1), pg. 4 , lines 1 - 4]

[Transcript(1), pg. 10, line 2]

[Transcript(1), pg. 10, line 3]

[Transcript(1), pg. 10, lines 18 - 23]

[Transcript(1), pg. 11, lines 1 - 2]

[Transcript(1), pg. 11, lines 3-5]

[Transcript(1), pg. 11, lines 12 - 18], Court actually asks for translation assistance from Plaintiff's attorney.

[Transcript(1), pg. 11, lines 22 - 24]

[Transcript(1), pg. 12 , lines 20 - 22]

[Transcript(1), pg. 13, lines 23 - 24]

[Transcript(1), pg. 14 ,line 19]

[Transcript(1), pg. 14, line 25]

Matter to be included

[Transcript(1), pg. 15, lines 11-25]

[Transcript(1), pg. 15, line 23]

[Transcript(1), pg. 15, line 25]

[Transcript(1), pg. 16, line 6]

[Transcript(1), pg. 16, lines 9-10]

[Transcript(1), pg. 16, lines 11-13]

[Transcript(1), pg. 16, lines 14 - 17]

[Transcript(1), pg. 16, line 18 - 19]

[Transcript(1), pg. 17, lines 11 - 13]

[Transcript(1), pg. 17, lines 14 - 15]

[Transcript(1), pg. 18, line 1]

[Transcript(1), pg. 18, line 23]

[Transcript(1), pg. 18, lines 24 - 25]

[Transcript(1), pg. 19, lines 1 - 2]

Matter to be included

[Transcript(1), pg. 21, lines 12 - 17]

[Transcript(1), pg. 22, lines 3 - 7]

[Transcript(1), pg. 22, lines 9 - 11]

[Transcript(2), pg. 10, lines 1 - 10]

[Transcript(2), pg. 10, lines 16 - 23]

[Transcript(2), pg. 12, lines 23-25]

[Transcript(2), pg. 14, lines 22-25, pg. 15, lines 1]

[Transcript(2), pg. 15, lines 11-16]

[Transcript(2), pg. 15, lines 22-25]

[Transcript(2), pg. 16, lines 1-7]

[Transcript(2), pg. 16, lines 22-25]

[Transcript(2), pg. 17, lines 1 - 10]

[Transcript(2), pg. 17, lines 17 - 25, pg. 18, lines 1 - 7]

[Transcript(2), pg. 19, line 25, pg. 20, lines 1-2]

[Transcript(2), pg. 19, lines 5 - 6]

Matter to be included

[Transcript(2), pg. 23, lines 6 - 23],

[Transcript(2), pg. 28, lines 5-6] Mr. Andy White quoted.

[Transcript(2), pg. 28, lines 16-25]

[Transcript(2), pg. 29, lines 1-25]

[Transcript(2), pg. 30, lines 1-25]

[Transcript(2), pg. 31, lines 1-8]

[Transcript(2), pg. 35, lines 2-25]

[Transcript(2), pg. 36, lines 1-2]

[Transcript(2), pg. 39, lines 3-9]

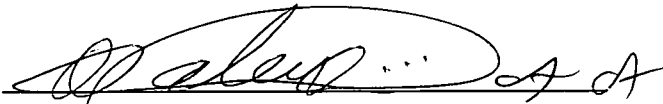
[Transcript(2), pg. 40, lines 1-6]

Order by Chief Justice Jean H. Toal, in letter of 5-20-2004, attached.

Affidavit Regarding Content Of Matter for Record Of Appeal

By copy of this letter, the Appellant does hereby affirm that the attached reference, Table Of Authorities, detailing the origin and sources of fact material used in the core argument made in this brief is in fact of genuine relevance to the argument made and essential in content to the intended argument.

On this day of April 25, 2016, I _____, do hereby swear the above statement to be true.



Alberto Alvarez
17 Latham Drive
Greenville, South Carolina 29617
864-275-7780
Attorney Pro Se

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

RECEIVED

Case No: 2016-cp-000152

APR 26 2016

SC Court of Appeals

PROOF OF SERVICE

Jean Elliott, aka Betty Jean Elliott
, Individually and as Personal
representative of the estate of
Ervin W. Elliott.


Respondent

vs.

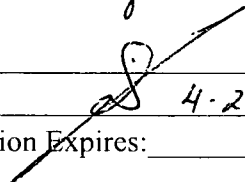
Alberto Alvarez, appellant and
representative appellant for
Guadalupe Ledesma-Martinez
and Estella Gutierrez-Garcia.

Appellant

I hereby attest in fact that I served a copy of: Initial Brief Of Appellant for the above referenced action, upon Richard Stewart, Attorney for Respondent, personally, at his address of business - 11 Whitsett Street, Greenville, SC 29601 on this day of April 25, 2016.

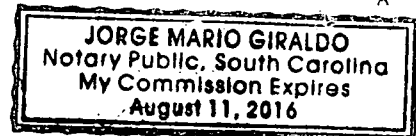

Alberto Alvarez
17 Latham Drive
864-275-7780

Notary Name Jorge Giraldo

Signature: 

Date: 4-25-16

My Commission Expires: _____



THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

Case No: 2016-cp-000152

RECEIVED

APR 26 2016

SC Court of Appeals

PROOF OF SERVICE

Jean Elliott, aka Betty Jean Elliott
, Individually and as Personal
representative of the estate of
Ervin W. Elliott.

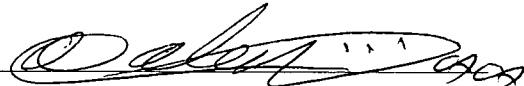
Respondent

vs.

Alberto Alvarez, appellant and
representative appellant for
Guadalupe Ledesma-Martinez
and Estella Gutierrez-Garcia.

Appellant

I hereby attest in fact that I served a copy of: Initial Brief Of Appellant, for the above referenced action, upon Guadalupe Ledesma-Martinez and Estella Gutierrez-Garcia, Personally, at their residence, address of 14 Henderson Street, Greenville Sc, 29611 on this day of April 25, 2016.

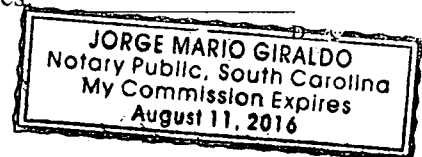

Alberto Alvarez
17 Latham Drive
864-275-7780

Notary Name Jorge Giraldo

Signature: _____

Date: 4-25-16

My Commission Expires: _____



THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

Case No: 2016-cp-000152

PROOF OF SERVICE

RECEIVED

APR 26 2016

SC Court of Appeals

Jean Elliott, aka Betty Jean Elliott, Individually and as Personal representative of the estate of Ervin W. Elliott.

Respondent

vs.

Alberto Alvarez, appellant and representative appellant for Guadalupe Ledesma-Martinez and Estella Gutierrez-Garcia.

Appellant

I hereby attest in fact that I served a copy of: Motion For Production And Admission Of Evidence To Appellate Proceedings, for the above referenced action, Personally upon Mrs. Jenny Abbott Kitching, Clerk - South Carolina Court Of Appeal or an Authorized Representative of same office. Address - 1220 Senate Street, Columbia SC, 29201 on this day of April 25, 2016.

Alberto Alvarez
17 Latham Drive
864-275-7780

Notary Name Jorge Giraldo

Signature:

Date: 4-25-16

My Commission Expires:

