

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM SUMTER COUNTY

COURT OF COMMON PLEAS

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

RECEIVED

MAY 04 2016

Appellate Case No: 2015-002481

SC Court of Appeals

Charles Taylor,.....Appellant

v.

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

(Appellant's 4-28-16 Reply)

TO RESPONDENTS' RETURN DATED 4-25-16

(1). That Appellant Charles Taylor, (hereinafter Appellant), hereby Reply to Respondents'

Return Dated 4-25-16; and that the Appellant's Reply is as follows:

(2). That lastly, Appellant's Reply to Respondents' Return, is that it should be noted that the Appellant have, once already, thrown away some of the materials prepared for the ROA etc. and started same all over again, at the Appellant's time and expense, as a favor to the Respondents-as is evident by the exchange between the Appellant and the clerk of court's office;

see;

said exchange exhibit p. 3-4 attached, and;

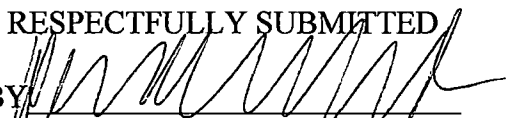
note: Mrs. Smith in clerk's office, thought initially to be in Respds' office---corrected-see-p.5

and;

(3). That the purpose of showing & highlighting the above is to show the reasonableness of Apln't & the reasonableness of his solution, he argues, to all pending motions which solution is found in Appellant's 4-18-16 Supplement to His Pending Motions; namely that all pending motions be denied, thus letting the *already prepared & ready for filing since before 4-11-16*, all Final Briefs and ROA, now be filed, and;

(4). That Appellant prays that the court agrees, that such is a reasonable solution to all pending motions, all things considered, at this stage of this appeal, given that all the Final Briefs and the Record on Appeal are all ready to be promptly filed without any more delay, if the court orders.

RESPECTFULLY SUBMITTED

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

Sumter, South Carolina,

April 28, 2016

February 29, 2016

The Honorable V. Claire Allen
Deputy Clerk of the South Carolina
Court of Appeals
1015 Sumter Street
Columbia, S.C. 29201

RE: Charles Taylor, Appellant

vs.

Stop "N" Save, Inc., d/b/a, El Cheapo Plus #7 and Roy Rahal, Respondents
Appellate Case Number: 2015-002481

Dear Mrs. Allen:

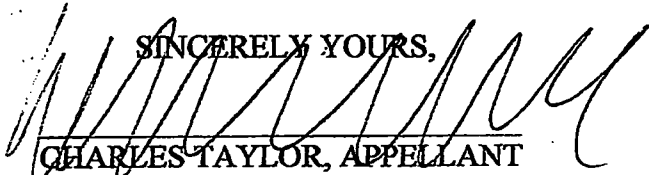
Thank you for your letter dated Feb. 26, 2016. The information was both very helpful and timely. I have a question though—about a week or so ago, I noticed Attorney Jessica Ann Waller's name signed on a document for the first time. I never received a correspondence noticing me formally of her appearance in this case. Your said letter formally noticed me of such. Prior to that, I had begun putting together the Record on Appeal and have produced the covers for such, which does not include Mrs. Waller's name with the other attorneys. The question as of this date is—must I destroy all that to redo—to include her name or do I include it from the date of your letter-forward?

I would have just done it but I have produced about 60 covers because they sent over ten hundred pages to be included in the record causing the need for 3 volumes.

I feel that if I were properly noticed of her appearance when it first occurred there would not be a problem where I must pay-suffer the consequences, for their failure as stated.

Thanks very much and please reply as soon as your time permits because I have on hold the ROA's preparation to be served by March 21, 2016 to the Respondents. I sent them a letter re: the above before today but no answers to my questions in that correspondence as of this date.

SINCERELY YOURS,


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

Cc: Attorney Jessica Ann Waller

p. 3
w/ Aplt's 4-28-16 Reply
to Respsd' Return
Dated 4-25-16

March 10, 2016

Amelia Smith
Gallivan, White & Boyd, P.A.
Post Office Box 7368
Columbia, SC. 29202

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MAR 14 2016

SC Court of Appeals

RE: Charles Taylor, Appellant

vs.

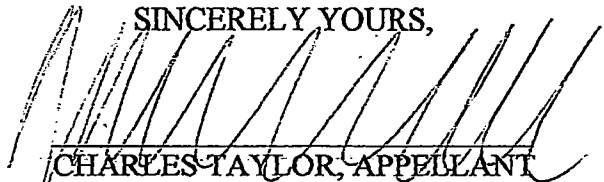
Stop "N" Save, Inc., d/b/a, El Cheapo Plus #7 and Roy Rahal, Respondents

C/A No: 2015-002481

Dear Mrs. Smith:

Per your phone call 3-10-16 afternoon, re the inclusion of Mrs. Jessica A. Waller's name in/on the Record on Appeal as one of the attorneys of record on appeal, since I appreciate your call and more importantly your seemingly cooperative tone, I am therefore including Mrs. Waller's name by destroying the previous done materials and re-doing it to include her name as just stated without further ado. This should serve as a lesson to your team re what can be settle with proper tone, etc.

SINCERELY YOURS,


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

RE: MY PREVIOUS LETTERS
ON THE SUBJECT MATTER

Cc: Clerk of Court SC Court of Appeals
Please clock & return extra copy in the SASE

p. 4
w/ Apint's 4-28-16 Reply
to Resps' Return
Dated 4-25-16

GRAY T. CULBREATH
Direct Dial: 803.724.1850
gculbreath@gwblawfirm.com



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Post Office Box 7368
Columbia, SC 29202-7368
803.779.1833 - TEL
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Gallivan, White & Boyd, P.A.
— ATTORNEYS AT LAW —

March 17, 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

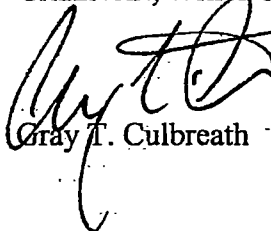
Dear Mr. Taylor:

I am in receipt of your letter dated March 10, 2016 to an individual named Amelia Smith. Please be advised that there is no one who works at this firm by the name of Amelia Smith, nor has there ever been anyone who worked in the Columbia office or any other office of Gallivan, White & Boyd named Amelia Smith.

Please call me if you have any questions regarding this matter.

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Gray T. Culbreath

GTC:lhs

p. 5
w/ ApInt's 4-28-16 Reply
to Resps' Return
Dated 4-25-16

STATE OF SOUTH CAROLINA
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SC Court of Appeals

Charles Taylor,.....Appellant

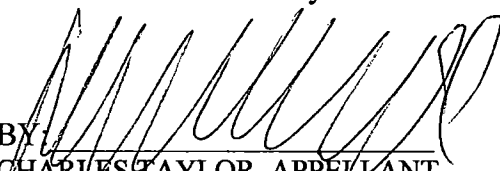
v.

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

PROOF OF FILING AND SERVICE

Appellant certifies that he filed (original + 6 copies) of his 4-28-16 Reply to Respondents' Return Dated 4-25-16 & serve same to counsel at his address below by US Mail.

April 28, 2016


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

Defendants' Counsels of Record:

Lead-Gray T. Culbreath, Esq.,
James E. Brogdon, Esq., and
Jessica A. Waller, Esq., of
Gallivan, White & Boyd, P. A.

Post Office Box 7368

Columbia, SC. 29202

(803) 779-1833; AND

Randy J. Soriano, Esq., of

Bryan Cave, LLP.

211 N. Broadway/Suite 3600

St. Louis, Missouri 63102

(314) 259-2384; AND

Julia L. Fenwick, Esq., of

Bryan Cave, LLP.

1 Atlantic Center, 4th Fl.

1201 W. Peachtree St., NW.

Atlanta, Georgia. 30309

(404) 572-6923

April 28, 2016

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

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SC Court of Appeals

RE: Charles Taylor, Appellant

vs.

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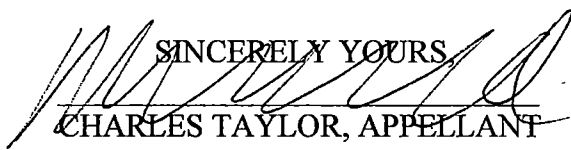
Appellate Case Number: 2015-002481

Dear Mrs. Kitchings:

Please find enclosed for filing, the following:

(1). Appellant's 4-28-16 Reply to Respondents' Return dated 4-25-16. and same served to lead counsel listed below to his address listed below. Please clock & return the extra copy to me in the self-addressed stamped envelope. Please let me know if there are any questions, that you have.

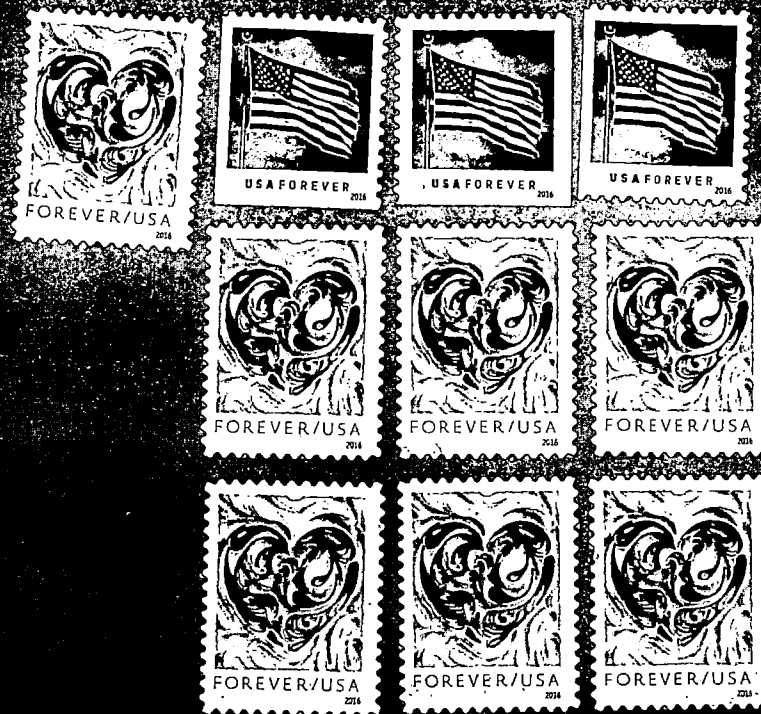
SINCERELY YOURS


CHARLES TAYLOR, APPELLANT
332 MYRTLE BEACH HIGHWAY
SUMTER SOUTH CAROLINA 29153
(803) 609-7990 UGCARDS@AOL.COM

Cc: Defendants' Counsels of Record:

Lead-Gray T. Culbreath, Esq.
James E. Brogdon, Esq., and
Jessica A. Waller, Esq., of
Gallivan, White & Boyd, P.A.
Post Office Box 7368
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(803) 779-1833; AND
Randy J. Soriano, Esq., of
Bryan Cave, LLP.
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(314) 259-2384; AND
Julia L. Fenwick, Esq., of
Bryan Cave, LLP.
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1201 W. Peachtree St., NW.
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(404) 572-6923

Charles Taylor
332 Myrtle Bch Hwy
Sumter SC 29153



Clerk of Court
SC Court of Appeals
1015 Sumter Street
Columbia SC 29201

LEGAL DOCUMENTS
HANDLE W/ CARE!

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MAY 10 4 2016
SC Court of Appeals