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APR 26 2016
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2014-002661

John M. English,

Appellant,

v.

Ellen Sexton and John E. White, Jr.,

Respondents.

**MOTION REGARDING
RECORD(S) ON APPEAL**

John E. White, Jr.
5305 Sumters Run
North Charleston, South Carolina 29418
(843) 327-0850
Respondent, Pro Se

Other Counsel of Record:

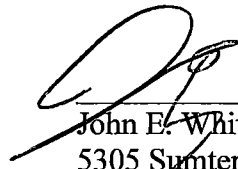
David Athell Collins, Esquire
7455 Cross County
P. O. Box 40578
North Charleston, SC 29423-0578

G. Thomas Hill, Esquire
6209 Savannah Highway
Ravenel SC 29470

Respondent respectfully moves before this Court for its proper order as follows:

- (a) Adjudicating that the record on appeal filed April 15, 2016 was not in compliance with the order of the Honorable Jasper W. Cureton dated March 29, 2016;
- (b) Adjudicating that the record on appeal filed April 15, 2016 was not in compliance with the requirements of Rule 210, subsections (a) and (c), SCACR;
- (c) Quashing the filing and any alleged service, if any, of the record on appeal filed April 15, 2016;
- (d) Providing that, in the event the Lower Court's order is not affirmed, Appellant shall not be entitled to tax the cost of the two deficient records on appeal thus far filed;
- (e) Providing for such other and further relief, including dismissal of the appeal if the Court should deem such appropriate, as may be just and equitable.

This motion is made based upon the failure of Appellant to comply with the order of the Honorable Jasper W. Cureton dated March 29, 2016 and the repeated failures of Appellant to comply with the requirements of Rule 210, SCACR, including the failure to serve movant with a copy thereof and file a proof of service, the failure to include multiple matters proposed by the parties, the incorrect certificate of counsel, and such other grounds as are more specifically identified in the Affidavit of John E. White, Jr. in Support of Motion Regarding Record(s) on Appeal filed herewith.



John E. White, Jr.
5305 Sumters Run
North Charleston, South Carolina 29418
(843) 327-0850
Respondent, Pro Se

April 24, 2016
North Charleston, South Carolina

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SC Court of Appeals

STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2014-002661

Case Number 2010-CP-10-7241

John M. English,

Appellant

v.

Ellen Sexton and John E. White, Jr.,

Respondents

PROOF OF SERVICE

I certify that I served

1. Motion Regarding Record(s) on Appeal;
2. Affidavit of John E. White, Jr. in support of Motion Regarding Record(s) on Appeal;
and,
3. Proof of Service

upon all other counsel of record by depositing a copy thereof in the United States mail, postage prepaid, on April 25 2016, addressed as follows:

David A. Collins, Esquire

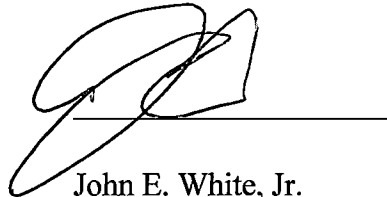
Post Office Box 40978

North Charleston, SC 29423

G. Thomas Hill, Esquire

6209 Savannah Highway

Ravenel, SC 29470



John E. White, Jr.

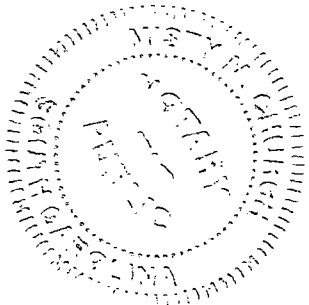
SWORN TO BEFORE ME THIS

25th Day of April, 2016

Misty M. Church

Notary Public for South Carolina

My commission expires: 5/22/2016



THE WHITE LAW FIRM, LLC

5305 Sumters Run
North Charleston, South Carolina 29418
Phone (843) 327-0850 / e-Fax (864) 751-4197
Email: vanwhitelaw@live.com

RECEIVED
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SC Court of Appeals

April 25, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1013 Sumter Street
Columbia, South Carolina 29201

RE: John M. English v. Ellen Sexton
Case No. 2014-002661
Lower Court Case No. 2010-CP-10-7241

Dear Ms. Kitchings:

Please find enclosed herewith and original and 8 copies of this Respondent's:

- (a) Motion Regarding Record(s) on Appeal;
- (b) Affidavit of John E. White, Jr. in support of Motion Regarding Record(s) on Appeal; and,
- (c) Proof of Service.

You will also find my check in the amount of \$ 25.00 for the filing fee.

Please file the originals and 6 copies of each and please return to me any copies include herewith which the Court does not need in the self-addressed, stamped envelope provided.

Should you have any questions or concerns, please do not hesitate to contact me.

Thank you.

Sincerely,



John E. White, Jr.

cc: David A. Collins, Esq.
G. Thomas Hill, Esq.

THE WHITE LAW FIRM
(843) 327-0850
THE UPS STORE #5851
STE 109

2 LBS 1 OF 1
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DATE: 25 APR 2016

8421 DORCHESTER RD
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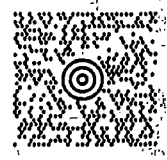
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APR 26 2016

SC Court of Appeals

SHIP HONORABLE JENNY ABBOTT KITHCINGS
TO: CLERK OF COURT, SC COURT OF APPEALS
1013 SUMNER ST

COLUMBIA SC 29201-3739



SC 292 9-01



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