

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

THE HOUSING AUTHORITY OF THE CITY  
OF CHARLESTON,

Plaintiff - Respondent,

vs.

KOEBY K. WILLIAMSON,

Defendants - Appellant.

SOUTH CAROLINA COURT OF  
APPEALS

**RECEIVED**

CASE NO.: 2015-001714

MAY 02 2016

SC Court of Appeals

THE HOUSING AUTHORITY OF  
THE CITY OF CHARLESTON'S  
MEMORANDUM IN OPPOSITION  
TO MOTION FOR REHEARING

COMES NOW, Plaintiff - Respondent The Housing Authority of the City of Charleston, by and through its counsel of record, THEODORE PARKER, III, ESQ. and JACQUELINE DIXON PHILLIPS, ESQ., of the law firm of PARKER NELSON & ASSOCIATES, CHTD., and hereby files this memorandum in opposition to Appellant's Motion for Rehearing.

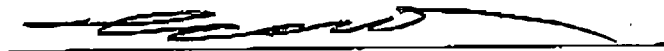
Appellant's grounds for rehearing are insufficient and do not support the Court granting his request. Appellant argues that because he is pro se, he was unaware of the Rules governing the appeals process. Mr. Williamson took it upon himself to file this appeal and represent himself, and he should therefore have undertaken to familiarize himself with the applicable rules at that time. He also argues that he is disabled and receives no benefits and had to get a loan in order to pay for the transcript. Again, Appellant should have familiarized himself with the applicable rules prior to filing his appeal and obtained the necessary funds to do so in a timely manner.

This is the second time that Appellant has used the same grounds to circumvent the proper procedure for pursuing an appeal in this Court. The Court has already been lenient in granting him an extension to order the transcript for this matter in the first instance. Mr. Williamson has had ample opportunity to familiarize himself with the Rules and abide by them.

Based on the foregoing, Appellant's motion should not be granted and his appeal should be dismissed.

DATED this 2nd day of May, 2016.

**PARKER NELSON & ASSOCIATES, CHTD.**



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*Attorneys for Plaintiff - Respondent,  
The Housing Authority of the City of Charleston*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this *2nd* day of May, 2016, served a copy of **THE HOUSING AUTHORITY OF THE CITY OF CHARLESTON'S MEMORANDUM IN OPPOSITION TO MOTION FOR REHEARING**, enclosed herein, upon all parties to these matters by delivering a true copy of same via U.S. Mail, addressed as follows:

Koebv K. Williams  
1338 B Ashley Avenue  
Charleston, SC 29405  
(843) 276-2084  
*Defendant-Appellant Pro Se*



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An employee of PARKER NELSON & ASSOCIATES, CHTD.

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MAY 02 2016  
SC Court of Appeals

May 2, 2016

**VIA FACSIMILE (803) 734-1839**  
**AND U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**Re: The Housing Authority of the City of Charleston v. Koeby K. Williamson**  
**Case No.: 2015-001714**

Dear Clerk of the Court:

Enclosed for filing please find the original and six (6) copies of The Housing Authority of the City of Charleston's Memorandum in Opposition to Motion for Rehearing in the above-referenced matter. Please file the document and return a file-stamped copy to our office in the self-addressed stamped envelope provided for your convenience.

Thank you in advance for your prompt attention to this matter. Should you have any questions, please feel free to contact our office.

Sincerely,

**PARKER NELSON & ASSOCIATES, CHTD.**

Eloisa Nuñez, Legal Assistant to  
Theodore Parker, III, Esq. and  
Jacqueline Dixon Phillips, Esq.

/en  
Enclosures

cc: Koeby K. Williamson