

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In The Court of Common Pleas

The Honorable Roger L. Couch

Case No. 2015-001714

The Housing Authority of the City of Charleston, Plaintiff - Respondent,

vs.

Koeby K. Williamson,

Defendants - Appellant.

RESPONDENT'S MOTION TO DISMISS

Theodore Parker, III, Esq.
SC Bar No. 65348
Jacqueline Dixon Phillips, Esq.
SC Bar No. 75978
PARKER NELSON & ASSOCIATES, CHTD.
211 King Street, Suite 107
Charleston, SC 29401
(843) 727-2500
*Attorneys for Plaintiff - Respondent,
The Housing Authority of the City of Charleston*

Other Counsel of Record:

Koeby K. Williamson
1338 B Ashley Avenue
Charleston, SC 29403
(843) 276-2084
Defendant-Appellant Pro Se

RECEIVED

SEP 19 2016

SC Court of Appeals

I. THIS APPEAL SHOULD BE DISMISSED FOR APPELLANT'S FAILURE TO COMPLY WITH THE RULES OF THE APPELLATE COURTS.

Rule 260(a) SCAR provides that "[w]henver it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court." Rule 260(a), SCAR, (emphasis added).

Appellant has repeatedly missed deadlines set out by this Court, including the most recent Order dated August 5, 2016, whereby Mr. Williamson was to serve and file his initial brief and designation of matter within 30 days of the date of the Order.

WHEREFORE, Respondent respectfully requests this Court enter an Order granting the following relief:

1. Dismissing this Appeal with Prejudice.

DATED this 15th day of September, 2016.

PARKER NELSON & ASSOCIATES, CHTD.



Theodore Parker, III, Esq.
Jacqueline Dixon Phillips, Esq.
211 King Street, Suite 107
Charleston, SC 29401
Phone: (843) 727-2500
Fax: (843) 727-2599
Email: tparker@pnalaw.net
Email: jdixon@pnalaw.net

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

CERTIFICATE OF SERVICE

I hereby certify that I have this 15th day of September, 2016, served a copy of **RESPONDENT'S MOTION TO DISMISS**, enclosed herein, upon all parties to these matters by delivering a true copy of same via U.S. Mail, addressed as follows:

Koeby K. Williamson
1338 B Ashley Avenue
Charleston, SC 29403
(843) 276-2084
Defendant-Appellant Pro Se

RECEIVED

SEP 19 2016

SC Court of Appeals

Alvina Nuñez

An employee of PARKER NELSON & ASSOCIATES, CHTD.

FAX HEADER 1:
FAX HEADER 2:

TRANSMITTED/STORED : SEP. 15. 2016 1:25PM
FILE MODE: OPTION

ADDRESS	RESULT	PAGE
G3 :8037341839	OK	4/4

REASON FOR ERROR
E-1) HANG UP OR LINE FAIL
E-3) NO ANSWER
E-5) MAIL SIZE OVER

E-2) BUSY
E-4) NO FACSIMILE CONNECTION

Theodore Parker III
tparker@pnalaw.net
Admitted in Nevada & South Carolina

Todd N. Nelson
1965-2002



Jacqueline Dixon Phillips
jdpn@pnalaw.net
Admitted in South Carolina

Stephonie A. Garabedian
sgarabedian@pnalaw.net
Admitted in Nevada & Washington

Yadira Rios Gibson
Of Counsel
yrios@pnalaw.net
Admitted in Nevada, California & Illinois

Shana D. Weir
sweir@pnalaw.net
Admitted in Nevada

Carlton D. Bowers
cbowers@pnalaw.net
Admitted in South Carolina

Thomas B. Pritchard
tpritchard@pnalaw.net
Admitted in South Carolina

Casay D. Gish
Of Counsel
cgish@pnalaw.net
Admitted in Nevada & California

September 15, 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 Respondent's Motion to Dismiss 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 Nufiez, Legal Assistant to
Theodore Parker, III, Esq. and
Jacqueline Dixon Phillips, Esq.

/en
Enclosures

cc: Koeby K. Williamson

Theodore Parker III
tparker@pnalaw.net
Admitted in Nevada & South Carolina

Todd N. Nelson
1965-2002



Jacqueline Dixon Phillips
jdixon@pnalaw.net
Admitted in South Carolina

Stephanie A. Garabedian
sgarabedian@pnalaw.net
Admitted in Nevada & Washington

Yadira Rios Gibson
Of Counsel
yrios@pnalaw.net
Admitted in Nevada, California & Illinois

Shana D. Weir
sweir@pnalaw.net
Admitted in Nevada

Carlton D. Bowers
cbowers@pnalaw.net
Admitted in South Carolina

Thomas B. Pritchard
tpritchard@pnalaw.net
Admitted in South Carolina

Casey D. Gish
Of Counsel
cgish@pnalaw.net
Admitted in Nevada & California

September 15, 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

RECEIVED
SEP 19 2016
SC Court of Appeals

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 Respondent's Motion to Dismiss 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.

A handwritten signature in black ink that reads 'Eloisa Nuñez'.

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

/en
Enclosures

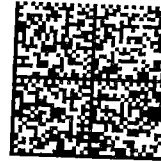
cc: Koeby K. Williamson

LAS VEGAS, NV

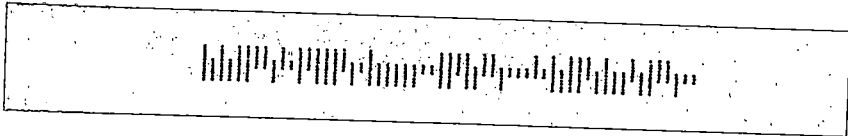
P: 702.868.8000 | F: 702.868.8001
2460 Professional Court, Suite 200 | Las Vegas, Nevada 89128

CHARLESTON, SC

P: 843.727.2500 | F: 843.727.2599
211 King Street, Suite 107 | Charleston, SC 29401



02 1P \$ 001.780
0001919006 SEP 16 2016
MAILED FROM ZIP CODE 89128



PARKER, NELSON & ASSOCIATES, CHTD.
2460 PROFESSIONAL COURT, SUITE 200
LAS VEGAS, NEVADA 89128

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

RECEIVED
SEP 19 2016
SC Court of Appeals