

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

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NOV 22 2016

APPEAL FROM CHARLESTON COUNTY

SC Court of Appeals

Court Of Common Pleas

The Honorable Mikell R. Scarborough, Master In Equity

Appellant Case No. 2016-002216

Charleston Harbor Resort and Marina,

Respondent

v.

Paul A. Davis,

Appellant

MEMORANDUM

Regarding the letter from the Court of Appeals, Dated November 9th 2016, I believe that I have the United States and SC Constitutional right to have my appeal heard based upon the fact that I have never been personally served.

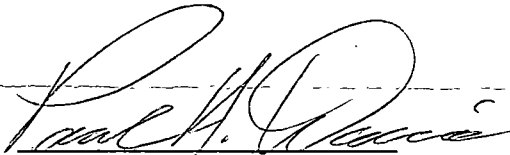
It is my understanding of both Federal and State Constitution that service by publication is not legal when the permanent address of the person attempting to be served is well known. I would like to reinforce that I have only had two permanent addresses since 2005, 14639 CR Koon Highway, Newberry, SC 29108 and 107 Averill Lane, Irmo SC 29063, both of which Charleston Harbor Resort & Marina and their counsel, William Scott has been well aware.

I do not subscribe to any newspapers in the State of South Carolina and therefore would be totally unaware of service by publication.

In conclusion, I **have not been personally served**, by the complaint resulting in a court order issued by Judge Scarborough.

Charleston Harbor Resort & Marina, their counsel William Scott, and Judge Scarborough, all have been informed in writing by my Cardiologist Dr. CW Hendrix, of my current condition, and his specific advise that I avoid subjecting myself to both stress and travel.

I am requesting that the court hear my appeal and rule in my favor based on the unquestionable and undeniable fact, I have not been personally served.

A handwritten signature in cursive script, appearing to read "Paul A. Davis".

Paul A. Davis Pro Se
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Newberry, S.C. 29108
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CERTIFICATE OF SERVICE

I hereby certify that I served the memorandum on Charleston Harbor Resort and Marina by ~~depositing a copy of it in The United States Mail, postage prepaid, on November 21st, 2016~~ addressed to its attorney of record, William A. Scott, PC, Pedersen & Scott 775 St. Andrews Boulevard, Charleston, SC 29407.

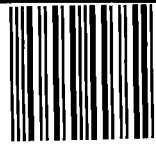


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Davis
107 Averil Lane
IRMO SC 29063

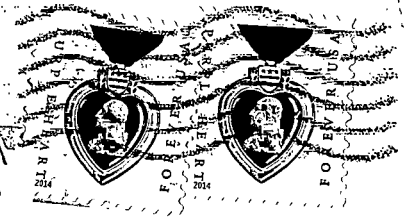


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SC Court of Appeals

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