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JUL 27 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

Honorable Craig D. Brown, Presiding Judge

Appellate Case No. 2015-001941

Elizabeth J. Langley .....Appellant

v.

Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch II, Donald Jordan III, Jimmy White, and S. Porter Stewart, II, as Personal Representative of the Estate of James M. Lynch,

Of whom Wendy J. Lynch is this.....Respondent.

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**APPELLANT'S REPLY MOTION OPPOSING RESPONDENT'S  
MOTION FOR COSTS**

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The Appellant, by Pro Se, hereby moves pursuant to South Carolina Rule 222, oppose to costs being assessed and taxed to the Appellant. As stated in Rule 222, "A party desiring cost to be taxed shall, within (15) days of issuance of the Remittitur, serve and file a motion requesting costs to be assessed under the Rule". Appellant opposes the request for costs to be awarded to the Respondent and request for their motion for costs to be dismissed due to the following:

1) Respondent is in violation of Rule 222 (d): Respondent filed the motion for costs on June 7, 2017, 5 days before the Remittitur sent down on June 12, 2017, which was not in the time allowed under Rule 222 (d). Rule 222 specifically states " within 15 days of issuance of the Remittitur, serve and file the motion requesting costs to be assessed under this rule" due the filing of the Motion Pre- Remittitur being sent down, Appellant request that Respondent's Motion for Cost be denied.

2) Appellant was represented by Attorney J. Rene Josey, who on June 1, 2017 told Appellant that his schedule didn't allow for a reconsideration and filed a Motion to be relieved as Counsel June 13, 2017. The Appellant is now Pro Se and received the letter and Respondents Motion for costs on July 20th, 2017 from South Carolina Court of Appeals dated July 17, 2017, this is 35 days after the Remittitur sent down (June 12, 2017) which is in violation of Rule 222 still : Rule 222 (d) states " A party desiring cost to be taxed shall, within (15) days of issuance of the Remittitur, serve and file motion requesting costs to be assessed. the Appellant wasn't served in a timely manner and request the Court of Appeals to deny the Respondents Motion for Cost to be assessed and taxed to the Appellant.

3) The Estate is missing millions of dollars of cash, gold and silver and Appellant believes the Respondent has it or has moved it from the estate. Under the circumstances believe that Respondent should not be entitled to the court cost.

4) The Respondent imposed financial hardships on the Appellant, by locking her out of her fathers house, where the appellant had been residing since January of 2012 and is Heir Property, causing the Appellant to have to rent an apartment . Also, the Respondents actions of

locking the Appellant out of her fathers residence, violated the Hcpoa and Dpoa that appointed the Appellant to make 50% decision of what happens to her father and his estate. The Contested Will named Equally the Appellant and the Respondent Executors over the Will if it stands, therefore the respondents actions violated the rights of the Appellant, by keeping her off of Heir property and not allowing the Appellant to secure, protect and account for assets of her Fathers Estate. Regardless, If the Contested Will stands or not the Appellant is a biological daughter and an heir, to her fathers home and his Estate.

5) The Appellant does not believe that the Respondent is a biological heir to the James Lynch Estate and doesn't believe she should be entitled to anything unless she proves she is a Biological Heir.

6) The Appellant is also asking for cost to be denied because appellant has been out of work Without pay for approximately 7 weeks due to a knee injury.

7) The Appellant prays that the Appeals court will deny the costs to be paid to the Respondent for all the reasons listed above. If not at least reduce the amount of cost required to be paid by the Appellant.

July 26, 2017

A handwritten signature in cursive script, reading "Elizabeth Langley", written over a horizontal line.

Elizabeth Langley  
1225 Edgewood Ave.  
Florence, South Carolina 29501  
843-615-6918

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PROOF OF SERVICE

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I certify this 26th day of July 2017 that I have served copies of the APPELLANT'S  
REPLY, OPPOSING MOTION FOR COST, by mailing same, postage prepaid in the  
United States mail, addressed to the following:

Joseph M. McCulloch, Jr., Esquire  
Kathy R. Schillaci, Esquire  
Law Offices of Joseph M. McCulloch, Jr.  
Post Office Box 11623  
Columbia, SC 29211

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J. Rene Josey, Esquire  
Post Office box 5478 (29502)  
Turner Padgett Graham & ILaney, PA  
Florence, South Carolina, 29501

July 26, 2017

A handwritten signature in black ink, appearing to read "Elizabeth Langley", written over a horizontal line.

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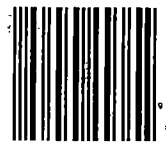


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SC Court of Appeals

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