

**APPEAL IN A CIVIL CASE**  
**THE STATE OF SOUTH CAROLINA**

**In The Court of Appeals**

**Case#: 2016-002024**

**RECEIVED**  
NOV 01 2017  
SC Court of Appeals

**APPEAL FROM CHARELSTON COUNTY**

**Court of Common Pleas**

**Kristi Harrington, Circuit Court Judge**  
**Dennis Markley, Circuit Court Judge**

**Case No. 2015CP1002824**

**David Scot Lynd**

**VS**

**Isle of Palms**

**Dawn Caldwell,**  
**Individually and in her capacity as an Officer of the Isle of Palms Police**  
**Department**

**South Carolina Law Enforcement Division**

**Reply to Respondents Response to Lynd Motion for Electronic Notification.**

Once again we are into IOP's counsel Mr. Domin's lies and fabrications to create a scenario in the courts eyes that somehow Lynd is at fault, and all of this is some unnecessary filing and beneath the dignity of the court to hear it.

First off Domin claims he was not served the motion; that is a blatant lie and the court should take action, not only does the certificate of service with the motion show it. But find attached the USPS mail receipts showing not only was it mailed, but additional care was taken to mail it priority to all parties and the clerk's office.

### **So not only did he receive it, it was signed for!**

Domin goes on to delve into some fairyland tirade that Lynd is failing to follow rules and this in turn is why the filings are delayed in reaching him.

**First this makes no sense what so ever**, and is Domin with his "atty" moniker thinking his claims will be considered facts because he is a lawyer. And that his ridiculous claims carry some kind of enormous weight, to distract the court from the facts. No matter the rules, are anything Lynd has done, can be the cause of the US mail taking longer than 10 days to reach Texas. The implication and claim is pure lunacy.

The issue is US mail from Charleston/Columbia to Dallas Texas takes longer than 10 days enroot, so Lynd, when required to reply in 10 days, CANNOT DO SO! when the order or motion does not arrive in 10 days. The time to reply has passed before Lynd is even aware of order/motion/etc that has a 10 day response time limit.

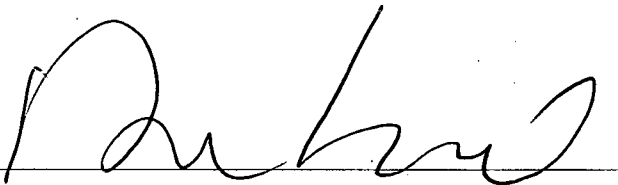
**Under no circumstances can Lynd following of Rules or Guidelines play any part is the US mail's delivery routes or time frames!** A clear and concise attempt by Domin to try and cast a cloud over Lynd's appeal.

Again this is Domin lying! to try and create some false implication that something other than the facts are transpiring. This is the exact scenario this appeal is about, is Domin's (*an officer of the court*) attempts to Lie to Lynd to try and cover-up facts, and delay past some imaginary time limit he had concocted in his mind. Due to the fact IOP and Domin have no way to answer the facts, and lose on the face of the facts as they stand.

Second Domin's Lies claiming he was only made aware of the motion discussed by calling the court asking for an update. That too is a lie, as stated earlier he was served, and Domin's attempt to receive pity, (*due to his fairytale scenarios he has concocted*) for nothing more than to again prejudice the court against Lynd for the upcoming appeal. The clerk's office log shows no 'record' of this call he claims made him aware of the motion.

Lynd is not asking for some special form of electronic foiling, just to have an email sent to show something was filed, a mere courtesy to counter the lengthy time it takes mail to arrive in Texas.

The Court should grant Lynd's motion in the interest of Justice and equity.

A handwritten signature in black ink, appearing to read "David Scot Lynd", is written over a horizontal line.

David scot Lynd

2605 Rustown

Mesquite TX 75150

469-323-1751

[dscotly@yahoo.com](mailto:dscotly@yahoo.com)

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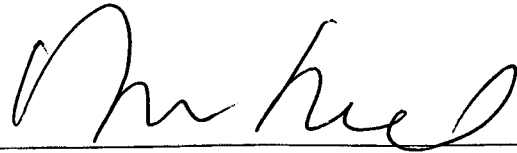
**Isle of Palms**

**Dawn Caldwell,  
Individually and in her capacity as an Officer of the Isle of Palms Police  
Department**

**South Carolina Law Enforcement Division**

**PROOF OF SERVICE**

I hereby certify that the above named parties were served this reply by **U.S.P.S. mail on 10-30-2017** to the address on file with the court shown below.



---

David Lynd

Timothy Domin  
126 Seven Farms Dr.,  
Ste. 200  
Charleston SC 29492

Dorsel, Christopher Thomas  
3 Wesley Drive  
Charleston SC 29407

Morrison, David Leon  
7453 Irmo Dr.,  
Ste. B  
Columbia SC 29212

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ROSEMEADE  
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First-Class Mail Large Envelope (Domestic) (CHARLESTON, SC 29492) (Weight:0 Lb 7.30 Oz) (Expected Delivery Day) (Thursday 09/28/2017)	1	\$2.45
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1220 Senate St  
P.O. Box 11629

Columbia South Carolina

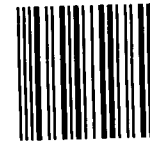
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UNITED STATES POSTAL SERVICE

NOV 01 2017

From Lyndell R. ...  
2648 ...  
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SC Court of Appeals

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S.C. Court of Appeals  
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1220 Senate St  
P.O. Box 11629

Columbia S.C. 29201

Label 228, January 2008



Expected Delivery Day: 11/01/2017

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