

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Court Judge

Case No. 2017-CP-10-02679

RECEIVED

NOV 27 2017

SC Court of Appeals

CARLOS COLEMAN.....Appellant, *pro se*,

v.

EDWARD L. KN ISLEYRespondent.

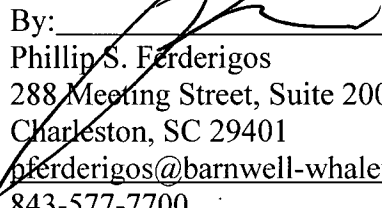
RETURN TO PRO SE APPELLANT COLEMAN'S
MOTION TO PROCEED WITHOUT COSTS PURSUANT TO SCACR RULE 240

BARNWELL WHALEY
PATTERSON & HELMS, LLC
Phillip S. Ferderigos
288 Meeting Street, Suite 200
Charleston, SC 20401
Counsel for Respondent

Respondent Edward L. Knisley hereby respectfully opposes the Appellant's motion because he has failed to set forth any proof or evidence concerning his inability to pay the minimal costs associated with his appeal. Accordingly, pursuant to SCACR Rule 240, the Appellant has failed to put forth any evidence in the Record or, as the Rule requires, to show "extraordinary" circumstances needed to support his motion and, accordingly, Respondent respectfully requests that Appellant's motion be denied.

Respectfully submitted,

BARNWELL WHALEY PATTERSON
& HELMS, LLC

By: 
Phillip S. Ferderigos
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PROOF OF SERVICE

I hereby certify that on the 21st day of November, 2017, I mailed a copy of the foregoing Return to Pro Se Appellant Coleman's Motion to Proceed Without Costs Pursuant to SCACR Rule 240, with sufficient postage, correctly addressed as follows:

Carlos Coleman, *pro se*
P.O. Box 40606
North Charleston, SC 29423

BARNWELL WHALEY PATTERSON & HELMS, LLC

By: 
Beverly Mitton, Legal Assistant



Phillip S. Ferderigos, Partner
pferderigos@barnwell-whaley.com
Charleston Office

November 21, 2017

The Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211-1629

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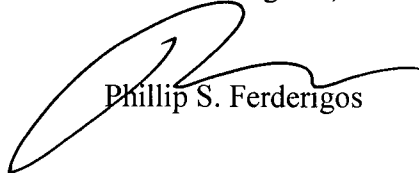
RE: Carlos Coleman v. Edward L. Knisley, Jr.
C/A No. 2016-CP-10-02679
Our File No.: 2769.005

Dear Jenny:

Enclosed please find an original and seven copies of Respondent's Return to Pro Se Appellant Coleman's Motion to Proceed Without Costs Pursuant to SCACR Rule 240 with regard to the above matter. Please file the original and return one clocked copy to me in the envelope enclosed for your convenience.

By copy of this correspondence and pursuant to the Proof of Service, I am hereby serving *Pro Se* Plaintiff with a copy of the same. Please let me know if you have any questions or concerns.

With kind regards,



Phillip S. Ferderigos

Enc.

cc: Carlos Coleman (w/enclosure)
PSF/bbm

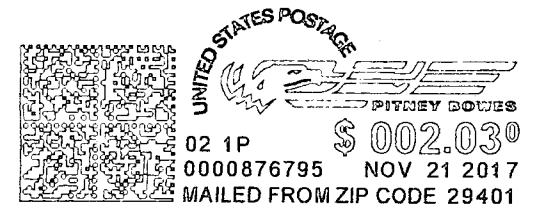
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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE



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P.O. Drawer H, Charleston, SC 29402-0197

2769.005

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The Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
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Columbia, SC 29211-1629

