

PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2016-CP-23-6547

Harold Estes Blackwell, Jr.

Appellant

v.

Toby Woodard

Respondent

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SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on defendants by depositing a copy of it in the United States Mail, postage prepaid, on December 18, 2018, addressed to Amy Snyder, attorney of record for Toby Woodard.

December 18, 2018



Harold E. Blackwell, Jr.
315 Glendale Road
Union, South Carolina 29379
(864) 303-7000
Appellant, *pro se*

Harold (Hal) E. Blackwell, Jr.
315 Glendale Road
Union, South Carolina 29379
halblackwell@gmail.com

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March 2, 2018

V. Claire Allen, Deputy Clerk
South Carolina Court of Appeals
Post Office Box 29211
Columbia, South Carolina 29211

Re: Harold E. Blackwell, Jr. v Miracle Hill Ministries, Inc. Appellate Case No. 2017-002618

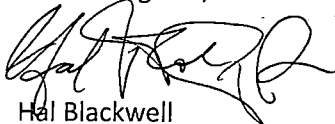
Dear Ms. Allen,

Please find enclosed the Certificate of Service on the Initial Brief submitted to the Court on December 18, 2017, according to my records. Also find the \$25 filing fee.

I noticed the Initial Brief has not been recorded on the website. I think our letters may have crossed in the mail.

I would like to also note receiving a copy of Ms. Snyder's last correspondence with your office. Appellant craves her response in this matter. Indisputably, Respondent has pled truth as an affirmative defense and is clothed with the burden of proof. Justice demands Mr. Woodard answer and prove his allegations, any form of legal maneuvering on the part of Ms. Snyder withstanding.

Kindest regards,



Hal Blackwell

Plaintiff, pro se

(864) 427-2174

halblackwell@gmail.com

(864) 303-7000
halblackwell@gmail.com

**LETTER TO THE APPELLATE COURT CLERK
FILING THE NOTICE OF APPEAL**

December 20, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Harold Estes Blackwell, Jr., Appellant, v. Toby Woodard
Appellant Case No. 2017-002635

Dear Ms. Kitchings:

Enclosed are the following:

- (1) Proof of service of the notice of appeal on the respondents
- (2) Email of opposing counsel acknowledging service

According to my records I submitted this document on December 20, 2017.
Enclosed is a proof of service and an email from Ms. Snyder to me
acknowledging service.

Sincerely,



Harold E. Blackwell, Jr.
315 Glendale Road
Union, South Carolina 29379
(864) 303-7000
Appellant, *pro se*

cc: Amy Snyder
Clawson and Staubes
1000 E. North Street
Greenville, SC 29601



Hal Blackwell <halblackwell@gmail.com>

RE: Woodard, Toby adv. Harold Estes Blackwell, Jr. (File #: 20170794.000) - Claim No: HYE6293

1 message

Amy Snyder <asnyder@clawsonandstaubes.com>
To: Hal Blackwell <halblackwell@gmail.com>

Thu, Dec 21, 2017 at 3:47 PM

We need not litigate your appeal by email.



Amy M. Snyder

Licensed in SC

1000 E North St., Suite 200 | Greenville SC | 29601

Office: 864 331 8940 Ext. 2403 | Fax: 864 232 2921 | Direct: 864 546 4389

Driving Instructions: [Using GPS](#) | [Print Map](#)

Website: www.clawsonandstaubes.com | Email: asnyder@clawsonandstaubes.com | Location: [Map](#)

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From: Hal Blackwell [mailto:halblackwell@gmail.com]

Sent: Thursday, December 21, 2017 3:47 PM

To: Amy Snyder <asnyder@clawsonandstaubes.com>

Subject: Re: Woodard, Toby adv. Harold Estes Blackwell, Jr. (File #: 20170794.000) - Claim No: HYE6293

Also, don't forget, Judge Miller never ruled on my first 59(e) motion. So, there's that.

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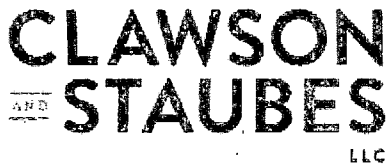
On Thu, Dec 21, 2017 at 2:58 PM, Amy Snyder <asnyder@clawsonandstaubes.com> wrote:

I received a notice of appeal today undated and with no cover letter. In any event it is untimely. Blackwell had 10 days to file his motion to reconsider to stay his appeal. He filed it way later than that. The court ruled on it, but I don't think the time to appeal is stayed based on an untimely motion.

When we receive verification this has been filed with the court of appeals we will move to dismiss and try to short circuit the cumbersome and lengthy appellate process we operate under.

Thanks and Merry Christmas,

Amy



Amy M. Snyder

Licensed in SC

1000 E North St., Suite 200 | Greenville SC | 29601

Office: 864 331 8940 Ext. 2403 | Fax: 864 232 2921 | Direct: 864 546 4389

Driving Instructions: [Using GPS](#) | [Print Map](#)

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Hal Blackwell

(864) 303-7000

Hal Blackwell
315 Glendale Road
Union, SC 29379

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Expected Delivery Day: 03/08/2018

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