

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM OCONEE COUNTY
COURT OF COMMON PLEAS

HONORABLE J. CORDELL MADDOX, CIRCUIT COURT JUDGE

CASE NO. 2016-CP-37-0060

MITCHELL EUGENE DAVIS a/k/a MITCH DAVIS a/k/a MICHAEL DAVIS,
RESPONDENT

v.

SUSAN HARRISON and CHRISTOPHER JONES, PLAINTIFFS,
Of whom CHRISTOPHER JONES IS THE
APPELLANT

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Return, Reply and or Response Appellate Case No. 2018-000625

- I. As to paragraph 1., as to consolidating the two appeal cases, that is as Ordered.
- II. But, the Appeal Court, upon information and belief, has not “allowed” the person filing this “Appellant’s Status Update” her appeal, as Respondent has received no notice of that fact.
- III. As to paragraph 2., The language may be part of the document stated, but, the Party filing this Appellant’s Status Update, “forgot to state”, party Christopher Jones was not present was noted.
- IV. As to paragraph 3., appears to be correct.
- V. Respondent has not been noticed that Desimber Wattleton-Jones is an Appellant.

VI. As to paragraph 4., a few questions are raised by the alleged facts as there stated, one being, Respondent Davis was not present due to the actions of the non-members; as Respondent was not allowed to be present and two, that the actions as here stated appear to have been filed after the hearing of February 22, 2018 after the Order from the Bench..

As to paragraph 4., Judge Maddox, stated the only reasons for granting the motion, "was to correct the Dismissal Order only as to the enforcement by law enforcement officials". At no time did the Judge state or order that any part of the Dismissal Order was changed and or amended or deleted (except for law enforcement enforcing the Order) as to the placement of Respondent as the Pastor of the Church.

Further, as to the allegations of the remaining as to statements made by the Judge, that or those are denied and strict proof is requested.

VII. As to paragraph 5., that information is neither denied nor admitted as that Information concerns the ordering of court transcripts.

VIII. As to paragraph 6., The party continues to respond to the Appeals Court as representing the other party Christopher Jones and then two additional parties without Order were added to the case. Respondent has no notice of any other party appealing the ruling of the Court, especially by the Church.

Further, only after the hearing held in Oconee County Courthouse did the Appellant Christopher Jones and this Desember Jones argued jurisdiction.


Further, the Appellant Jones has as the Plaintiff always stated or argued that the Court had jurisdiction and now is arguing or stating the Court does not have jurisdiction. Also, Appellant Jones during the action under the section denoted "Parties" added additional parties, including the Church.

Finally, and again, the pleading is signed by one party Desimber Wattleton-Jones, as Appellant Pro Se, but during the body of the "Appellant's Status Update" pleading or filing, the signing party uses the plural as if Representing the other parties including Appellant Christopher Jones.

1.. Respondent shows the Court that the Court's Form Order indicates that the

hearing was as reported here, that is, that the Court held the Motion hearing to “remove the provision as to law enforcement involvement only”, “ not to change the Order as to Respondent”, The Court again stated the Order was a Dismissal based on the administrative dismissal founded on the factors that the parties the Plaintiffs were repeatedly requested to have an attorney representation and did not and that the Plaintiffs were required to have their church represented by an attorney.

June 9th, 2018



JAMES P. O'CONNELL #4259
139 GRACE DRIVE
EASLEY SOUTH CAROLINA 29640
ATTORNEY FOR RESPONDENT

OTHER COUNSEL OF RECORD:

NONE

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South Carolina Court of Appeals
Clerk of Court Jemmy Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina (SC) 29211

**OCONEE COUNTY COMMON PLEAS COURT
HEARING COVER SHEET**

JUDGE:	J Cordell Maddox, Jr.
DATE:	06/04/2018
DOCKET #:	2016CP3700060
NATURE OF HEARING:	Judge To Amend Final Order
PLAINTIFF:	Susan Harrison; et al
PLAINTIFF'S ATTORNEY:	Pro Se
DEFENDANT:	Michael Davis; et al
DEFENDANT'S ATTORNEY:	James P O'Connell, Esq.
NOTES: Judge held hearing to amend Order of Dismissal filed 4/5/18; to remove provision of law enforcement involvement. Dismissal was an administrative dismissal. Judge to prepare amended Order of Dismissal.	
IF NO HEARING IS HELD PLEASE CHECK ONE OF THE FOLLOWING:	
CASE CONTINUED <input type="checkbox"/> DISMISSAL TO BE FILED <input type="checkbox"/> OTHER <input type="checkbox"/>	

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MITCHELL EUGENE DAVIS a/k/a MITCH DAVIS a/k/a MICHAEL DAVIS,

RESPONDENT

v.

SUSAN HARRISON and CHRISTOPHER JONES, PLAINTIFFS,
Of whom CHRISTOPHER JONES IS THE
APPELLANT

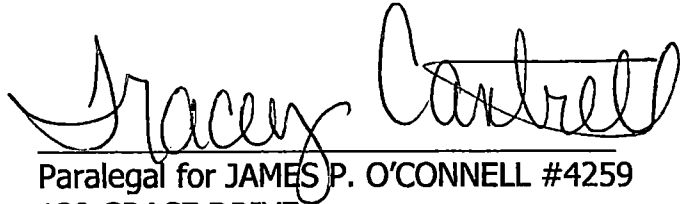
Certificate of Service by Mailing
Return, Reply and or Response Appellate Case No. 2018-000625

CERTIFICATE OF SERVICE Appellate Case No. 2018-000625

I, Paralegal for Attorney for Respondent, do hereby affirm that I served y U. S. Mail or did cause the same to be hand delivered a copy of the Return, Reply and Or Response to the "Appellant's Status Update" on the Appellant and the party Issuing the "Appellant's Status Update" at the following address, the date written below:

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June 2, 2018



Paralegal for JAMES P. O'CONNELL #4259
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Paralegal Tracey Cantrell

OTHER COUNSEL OF RECORD:

NONE

OTHER PARTY(S) OF RECORD:

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June 26, 2018

Clerk South Carolina Court of Appeals
Attn: Clerk of Court Jenny Abbott Kitchings
Attn: Clerk of Court Kitchings
1220 Senate Street
Columbia, South Carolina (SC) 29201
Post Office Box 11629
Columbia, South Carolina (SC) 29211

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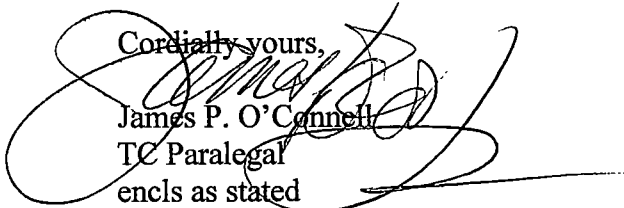
RE: Mitchell Eugene Davis aka Mitch Davis aka Michael Davis, Respondent
v. Susan Harrison and Christopher Jones, Plaintiffs of whom Christopher Jones is the
Appellant Appellate Case. No. 2018-000625

Dear Clerk V. Claire Allen: or, Clerk of Court, Jenny Abbott Kitchings:

- A. Find here enclosed for clocking in and recording for filing, the Repondent's
- B. Return, Replying, etc to "Appellant's Status Update", by a party.

Advise promptly in writing.

Cordially yours,


James P. O'Connell

TC Paralegal
encls as stated
cc as indicated

James P. O'Connell, Esquire
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