

MOTION OF APPELLANT*

Motion to Add Appendix and New Theories of Recovery

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

SEP 20 2018

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Harold Estes Blackwell, Jr..... Appellant

Miracle Hill Ministries, Inc Respondent

Case No. 2017-002635

Comes now Appellant, *pro se*, to move this Court to supplement the Record on Appeal in the instant case pursuant to Rule 212 by adding the following exhibits to an appendix on the Record on Appeal as provide for under the South Carolina Rules of Civil Procedure (SCRCP):

- Exhibit A- a document created when Appellant highlighted the text of Bill Greene's Facebook messages of September 8, 2018, then copied them to the clipboard on the Microsoft Office software and pasting the contents of that entry on the clipboard to new Microsoft Word document. (See Exhibit E- Appellant's affidavit).
- Exhibit B- a document created when Appellant highlighted the text of Bill Greene's Facebook messages of September 10, 2018, then copied them to the clipboard on the Microsoft Office software and pasting the contents of that entry on the clipboard to new Microsoft Word document. (See Exhibit E- Appellant's affidavit).
- Exhibit C- Appellant's withdrawal letter published verbatim in the Union Daily Times, September 8, 2018.
- Exhibit D- The Facebook messenger publications of Toby Woodard.
- Exhibit E- Appellant's affidavit.
- Exhibit F- motion for the Court to issue a restraining order against Mr. Greene.

Exhibit A is a copy of the Facebook messages sent to Appellant by William Eugene Greene, Jr. which clearly demonstrates the horrible nature of damages caused by Respondent's defamatory publications.

Mr. Greene, on the night of Saturday, September 8, 2018, after learning of Appellant's withdrawal announcement from the Union County Supervisor's race was published on earlier that day on the front page of the Union Daily Times (see Exhibit C), thought Appellant was in the depths of despair regarding his withdrawal from the Union County supervisor's race, and knowing Appellant had attempted suicide in December of 2015, did attempt to murder Appellant by inciting him to take his own life. But for Respondents' induced suicide of Appellant, Mr. Greene would not have made such an attempt nor would Appellant be subject to like attempts in the future. Mr. Greene does not deny he made an attempt to murder Appellant. (see Exhibit B).

Appellant could not have notified the Court or made this filing earlier.

Mr. Greene's actions represent another theory of recovery under the Rules.

As Appellant has presented another theory of recovery, this case must be remanded according to the Rules.

Appellant also moves this Court to include in the aforementioned appendix a copy of the Facebook messages sent to Appellant by Toby Woodard, (see Exhibit D), on June 15, 2016, an employee of Respondent Miracle Hill.

Mr. Woodard's messages were sent to Appellant when Mr. Woodard believed Appellant was "Lynn Estes," a Facebook profile Appellant created to keep tabs on his wife.

Mr. Woodard's publications to Lynn Estes show Respondent's defamatory statements have been published to third parties.

Mr. Woodard's publications represent another theory of recovery to Appellant and therefore, this case must be remanded per the Rules.

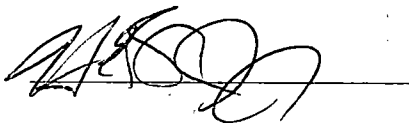
Exhibits A and D represent a new theory of recovery to Appellant by reviving Appellant's civil conspiracy claims against all Respondents.

Appellant expects to learn information during discovery which will lead to other theories of recovery.

Appellant prays the Court will add these Exhibits to the Record on Appeal in the form of an appendix as provide for in the Rules.

Appellant prays the Court will remand this case based on the new theories of recovery represented in the appendix.

So says the Appellant,



Harold E. Blackwell, Jr.
315 Glendale Road
Union, SC 29379
(864) 303-7000
Halblackwell@gmail.com

Exhibit A

2:59PM



Well once again you've lost. Hell you are such a failure you can't even kill your self. You are pathetic. Your hatred for your family is unbelievable. Guess what I gave your daughter away and she hates the air you breathe. None of your family cares whether you're even alive. Guess what I will be in Union before the election with copies of the checks you forged. You going to jail or hell the choice is yours. For now. Your dumb ass used forged checks for political gain. Guess what SLED already has the copies. You are the lowest life piece of shit for stealing from your mother. Every person that even knows your name will know what a piece of shit you are. Letter to the editor. I've already contacted the attorneys you are suing. They already know about you. Your shit is coming unglued and every mother fucking person that has ever heard your name will know what a cock sucker you are. Rest assured I'm not done with you. You need to disappear cause not one person on this earth cares whether you live or die. Oh and by the way I'm giving your other daughter away. You low life piece of cum eating shit. Jesus dude my ass. You are the lowest possible piece of shit imaginable. Can't wait to take a shit on your grave.



Check mate cock sucker

SAT 6:01PM



Just read your withdrawal letter. Can you even tell the truth. Taking care of your mother. Really you lying bastard. I will let the people of Union know the truth and you are going to jail for forging your mothers name. Wow. SLED must work fast. You're an idiot and a liar. Your own mother wants nothing to do with you. And everyone in Union will know that as well



Coward

SAT 7:54PM

Hal

Go Gamecocks



You're a fucking CAROLINA graduate dumbass
Will you ever tell the truth. I'm with your mother watching the game. Oh but you with draw because you're taking care of your mother. Surprised you're not in jail.
Once again you lost. Idiot
Couldn't help yourself could you



You are the lowest piece of shit I have ever known. Writing checks out of your mothers account that your name is on acting like you have that right. SLED says otherwise I got your number mother fucker. Check mate cock sucker. Hang on and wait their coming and hells coming with them. My letter to the editor telling them you stole and abused your mother and you haven't taken care of shit. You're such a fucking fraud. How's it feel that your family hates you. You're a pitiful insane mother fucker. I'm really ready to get this done. Big

Bubba will be fucking that ass. I'm just getting started and I'm not afraid of you at all. You're a fucking coward



Unleash the beast mother fucker. Come on pussy
I'm sure your coward ass will block me. You're just that big of a pussy. Threatening my wife and your mother.
I can't wait to see you again
Not
Jesus dude my ass. You're a fucking fraud. Come on bitch. I'm waiting for your sorry ass to reply. I know you want to
Why don't you put yourself out of your misery You're done mother fucker
I'm sure you're trying to figure out how to sue me you pitiful piece of shit.
No fight left in you
You folded again



I'm losing interest in you. You are such a coward. Nothing to say for yourself. No cause you're a fraud
How's it feel to be up there stealing from your mother
Come on bitch.
What I thought. You're a coward. You can only Big a big guy against women. You're the ultimate piece of SHIT
Wife beater. Put your children through that. You are the lowest of mother fuckers out there.
Your daughters hate you and the fucking air you breathe
Yeah I will beat you when you're down cause that's what you did to your family. Wish I had a chance to show you what I think of you but you're a fucking coward.
Yeah I know all about your imitation game and I want some. I thought SLED already had you but you gave that up when you replied to me. You're just too big of a coward to debate me



Come on mother fucker let your nuts drop. Didn't think so you can only intimidate women. You're the lowest of low
I'm not going to stop because I want you gone. To jail or hell the choice is yours
You can talk shit to your sister. Talk shit to me. Come on coward
Yeah that's what I thought. You're a fucking coward
Guess you will try and sue me for harassment. I'm waiting. I want you exposed no matter the cost to me. Come on cunt
Let's go toe to toe



I love it. Insert gun in mouth pull trigger and take your sorry ass to hell
Shit you can't even be successful killing yourself. You're a waste of breath



Not done with you till you're done. Either in jail or hell. Your choice. I'm just getting started.



Ok I'm done for the night. Go waller in your pity

Exhibit B

TUE 8:04PM



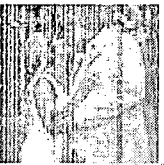
I promised Sister I would not contact you again. I'm sorry about the other day. Sometimes you just have to get things off your chest. I pray that you repair your relationship with your family while you still can. I wish you no harm and I don't want or need your and Sisters house. Please for the sake of everything holy try and make amends. Right now they don't want you in their lives but you are the only one who can fix things. I hope you find peace and will try to make amends with your family. My Mom passed away today and I would hate to know that I was where you are. I will help you if you so desire

You are a dangerous sick man who must be dealt with. You have done your best to destroy my family. You are going to a young lady you would walk down the aisle as you do. Carrie, love, I don't want a healthy relationship with another man, I don't want her to be as she does. I am the island of legitimacy in my daughter's lives. You and my sister have lead them down the easy road arrogantly and for your own gain. I know you tried to make me to suicide Saturday. That's attempted murder you prick. You have taken the rope and proven who you really are to my girls. You are truly despicable and I will be taking out a restraining order against you tomorrow. At least your name didn't have to live to see you get your just deserts. I have a wonderful funeral probably won't be able to squeeze it in. Give my daughters my regards.



Very well. I was sincere. It's up to you with your relationship with your mother. Not me. I offered so you can take it or leave it. It's all up to you

You are the most arrogant, most selfish, couldn't create



Ok. Sorry I bothered you. I am sincere about your mother so undoubtedly that doesn't matter to you. You can save yourself the trouble with the restraining order. I won't ever offer to help again.

If you have anything further to say to me contact my attorney Dan Parnsworth at 864 250 9119. While I would relish meeting you like the children you are our

fraudster requires our help. Im sure youll find
M. Iams with a more than adequate replacement. Im
re meant me. Ill see you anywhere and you are
approaching me. I will assume you mean to do me
harm. You messed with the wrong dude in the most
terrible way imaginable. They make prison for people
like you. While you (your insurance company) is going
to pay me you have committed crimes against society.
You owe dues to pay. Get me close by saving my legal
funds has convinced me to tell you that any
destruction of any electronic device or being
informed of a subpoena or sanctions by the Court (Mr
Hansworth will be able to crawl in your ass further).
Youre blocked.



Ok fuck you dude. I was trying to help. That was your
last chance

ardor me for not trying to access your facebook
extended helping hand. Where have my crimes gone.
pay tell. You are stupid arrogant. You think you're
above the law. You ain't, I promise.



Ok. I already figured you were going to sue me. Guess
what your entire family including your mother and x
wife. I was sincere with my apology. It's not up to me
for you to except it but rest assured you won't be
allowed at your own mothers funeral unless you make
amends. I have nothing to gain from offering to help
you. You know I don't care I would hate to know I'm
where you are with your family. Your loss. Not mine

really think you're above the law. Ill be getting ready
for the education of a life time. Ill have to sue the evil
I have done. But time someone explain it to my
ignorance of the law is no defense.



Bye



Ok buddy. Good luck with that. Your own mother
could care less if you were dead. Do me a favor. Either

except my help or fuck off.

TUE 11:55PM



Be as arrogant as you want to. I don't care but your Sister does. That's all that matters to me. Sue me I don't care. I have insurance. I would hope you can see through the bullshit. I could care less. This is not about me. Except if or sue me I don't give a shit

Sent from Messenger
Chat Conversation End
Type a message...

Exhibit C

Harold E. Blackwell, Jr.
315 Glendale Road
Union, South Carolina 29379

September 5, 2018

Tommy Sinclair
1374 Meansville Road
Union, SC 29379

Drew McKissick, Chairman
SC Republican Party
P.O. Box 12373
Columbia, SC 29211

Darlene Pettit
Union County Elections Director
1246 S. Duncan Bypass, Suite B
Union, SC 29379

Dear Addressees,

I humbly ask my name be removed from the ballot for county supervisor in Union County, South Carolina for the upcoming election in November. The demands of caring for my aged mother and another matter of public concern require my full attention at this time.

My conscience, as well as honor, together alone, demand I confess to cheating on a test given to qualify high school football officials. Failing such a stark choice between right and wrong, I feel unready for the public trust necessarily imbued to a county supervisor at this time.

I did not lie to my children about Santa Claus. I have operated in the financial services industry for 40 years without a single customer complaint. I would never have believed, or conceived, myself capable of such stupidity. My desperate need of Divine Atonement is proved over and over as God's law reveals my depravity with hilarious regularity.

Hopefully, Union's FILOT transactions will not be as costly and the county's legal team put on their toes by my candidacy. I do, however, sincerely apologize to any inconvenienced or diminished by my efforts. Such a result was never my intent or desire.

I care deeply for our beloved county and the people of her blessed soil.

For the record and posterity,

Harold Estes Blackwell, Jr.

Exhibit D

Toby Woodard

06/14/2016 9:41PM



Toby

You do realize that message to Anita is public, on her timeline, correct? I'm guessing she might not want to have that there. Just a thought.

Lynn

I'm so sorry, I'll take it down now. I thought I was sending her a private message. I'm so, so sorry! Thanks telling me!

Toby, I can't see how to take it down. Could you let Anita know so she can delete it. I'm so embarrassed. I don't do Facebook often.



Toby

I hope I didn't sound like a jerk. I just suspect that she wouldn't want that on her timeline. There should be a little drop down to the right that looks like this: ^ (only pointing the opposite direction). Click that and see if there's an option to delete.

Lynn

Once I click that I get various options, which option?



Toby

does it not have a "delete" option?

Lynn

No delete.



Toby

hmmm + hide?

Lynn

I got it. I'm so sorry. I



Toby

Again, I wasn't trying to tell you your business. He's a sensitive subject for her.

Lynn

ve been in a couple of meeting with him and thought I would let her know.

Please tell her I'm so sorry and will not make that mistake again.



Toby

I don't see her, but I'm sure it's not a problem

Sorry to message you. How do I know you, by the way?? My memory is not what
it used to be (fried a few brain cells in the day)

renewal/

?

Lynn

I can relate. I work at Greenville Tech and we brought some things by when she was at Miracle Hill. We had a nice conversation and being in recovery and very anonymous. She seems to understand.



Toby

So we've never met, correct? I teach at Renewal, but I've done it for a couple of years and definitely can't keep up with everyone. Hope you're not offended.

Lynn

Hal seems to be a very nice guy and has helped me a lot (although he's an incurable flirt). His divorce had a dramatic impact on his life (and he's no fan of Miracle Hill btw).

Not offended at all.



Toby

I'm glad he has helped you. Please be careful with Hal. There's a LOT more to the story than I suspect he has told you. I mean no ill intent.

Lynn

Is there something I should know. I have no romantic intentions but if he's dangerous I'd like to know.

AA is great but there are people in the rooms.....



Toby

Oh, I know. I can't imagine what it's like to be a woman in AA. On behalf of all men: I apologize.

Lynn

To be clear Hal has been nothing but a gentleman around me. If he's got issues, he hides it well.



Toby

He was in his addiction at that time, so I don't want to hold it against him. But he made some threats and displayed some semi-dangerous behavior. He was very very blind to his contributions to their problems. And you said a mouthful: He hides it well. He can be very charming and manipulative. Of course, most addicts can. Hopefully he is in recovery and living with integrity. Just be careful.



Toby

I was insane in my addiction, so I can relate.

Lynn

I've only been in a few meetings with him and everybody in the group seems to hold him in high esteem. He's very honest about his struggles- he shared in the meeting tonight about his x and Miracle Hill. When someone asked him about "Anita" I put two and two together. I was just reaching out to Anita to let her know,

which was obviously a big mistake. I do not know her well enough to get involved in any way. I should have let what I heard there, stay there, when I left there. Lesson learned.



Toby

No big deal. Have you ever been to Downtown in the Morning? I go there semi-regularly. It's the best meeting I've found. What meetings do you go to?

Lynn

Easley, Clemson and Anderson, different ones. I'm not really happy with any. Anita said she went to a meeting off Pelham Rd. but that is just too far for me. btw I don't Hal is clueless about his part in their break up. He's pretty guilt ridden.



Toby

Check out Downtown in the Morning. It's literature based, so there's always a topic, and they stay in the solution, not the problem. There's about 140 yrs. of sobriety in the room too. What's really attractive is how honest and humble people are in the group.

<http://area62.org/dist10/downtown.php>

I've never met Hal, so I'm not drawing any conclusions. I know that when I was in addiction, every other person on the planet was the problem. It took me a long time to realize that I was my problem. And if I can "get it", anyone can.

Lynn

I don't know Hal that well. I just heard what I heard. I just would never want to do anything to alienate Anita. She seems very genuine. It really didn't make sense that he's driving a BMW and his x was at Renewal.

Are there many other women at Downtown?



Toby

It's fine, I'm sure. Don't think any more about it. You fixed it, and I doubt she even saw it. I'm not sure she's on FB anymore.

It's probably about 20-25% women, sometimes more.

but there's no "13 stepping" that I can tell



Lynn

I may drive in early for a meeting. I'm pass the 13th stepping. Been around that long. It is funny though to see the parties not so experience lol



Toby

It was actually a couple of women who started this group.

Where do you "drive in" from?

Lynn

Is there anything other than Hal's suicide attempt I should worry about? He is influential and your words concern me. I drive in from Easley.

All divorces are ugly in my experience so one side can't be given much more weight than the other. It is kind of an important question but I don't mean to impose.



Toby

Well, most of what I "know" about Hal, I know from Anita. So you have to take that into account. I DO know that he threatened to sue Miracle Hill because they wouldn't let him talk with Anita. I know that he showed up several times, even after hours, at Renewal. I do know that they had to get a restraining order on him.



Toby

As you say, there were no "innocent" parties -- not by a long stretch.

Lynn

Oh, no more need be said. Let's just keep this between us. No need to contribute to drama. Especially drama that will probably fade with time.



Toby

but we addicts loovvveee some drama 😊

recovery = embracing no drama

Lynn

I realized that right after I sent the message to Anita, lol.



Toby

don't be too hard on yourself

Lynn

Count me in the "still sick but trying to get better category"!!!



Toby

Alright, well thanks for visiting. Hopefully I'll meet you some day at a meeting!

It's good to go to bed tonight, rather than pass out.

we're all in that category

it's just a matter of degrees

Lynn

No kidding!!! Thank goodness God has let me see that!!!!



Toby

He's kind like that

Congratulations on making it another day!!! Hope you have a good evening and feel free to say "hey" anytime.

Lynn

You as well Toby, Peace.

One last question. Does Anita go to the Downtown group?

If she is angry I'm going to tell her we "spoke". I hope you will tell her my inquiry was innocent.

06/15/2016 6:53AM



Toby

I have never seen Anita at the Downtown group, so no.

Again, I doubt she even saw the post, so I wouldn't let it bother you any more.

Acceptance...

06/29/2016 4:24PM



Toby

Lynn, I hope you are well.

I received a disturbing fb message from Mr. Hal Blackwell today. I want to say that I was wrong for inserting myself into that situation, and for saying things I didn't know for certain. That was wrong of me, and I'm disappointed in myself.

Having said that, I was under the impression that I was sharing a private conversation with you. I'm saddened that you would share that.

I wish you the very best, however. I am still learning to mind my own business.



07/01/2016 8:52PM

Lynn

Are you saying you lied to me about Hal? After reflecting on our conversation I realized why Hal had such a problem with Miracle Hill. I can't imagine anyone would hire Hal after what you said about him. I sent him the conversation after reflection because he has, as I said, done a lot for me. Hal says what you said is untrue. Frankly, I will be interested to know. If you lied about him having a restraining order taken out against him that is very serious. He swears that is a lie. I hope you guys get this straighten out. Right now I am not incline to apologize for helping Hal defend himself if you were lying. I don't know what to say.

07/01/2016 10:15PM

Lynn

Toby, Hal told me Anita was back in treatment. If so I would be very concerned about the truth of her accusations. He doesn't know where. I hope you didn't know that when you relied on her account. I think Hal is telling the truth.

Toby Woodard

06/14/2016 9:41PM



Toby

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Exhibit E

Exhibit F

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

Harold Blackwell Jr
315 Glendale Road
Union, SC 29379

MAGISTRATE SUMMONS

You are hereby summoned to be and appear personally in the

Irmo Magistrate Court
111 Lincreek Drive
Columbia, SC

on October 15, 2018 at 10:30 AM to serve as a party in a Bench Trial in the case of:

RE: Harold Blackwell Jr

Vs

William Eugene Greene Jr

PLAINTIFF(S)

DEFENDANT(S)

Civil Case Number: 2018OR3210700017, Restraining Order.

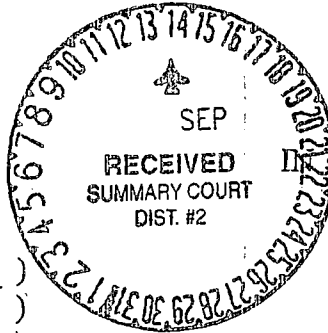
HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN
SUCH CASE MADE AND PROVIDED.

R Adams
JUDGE

Irmo Magistrate Court
111 Lincreek Drive
Columbia, SC 29212
Phone: (803) 785-2384
Fax: (803) 749-4050

September 14, 2018

STATE OF SOUTH CAROLINA)
COUNTY OF _____)



THE MAGISTRATES COURT

Harold (Hal) E. Blackwell, Jr.)

PLAINTIFF(S)

VS.

William Eugene Greene, Jr.)

DEFENDANT(S)

COMPLAINT AND MOTION
FOR RESTRAINING ORDER
(Harassment and Stalking)

OR
2018 3210700017

CIVIL CASE NUMBER

The Plaintiff alleges:

1. The Plaintiff lives in Union County.
2. The Defendant lives at 1011 Willow Creek Ct. Chapin S.C., which is in Lexington County, S.C.
3. The Harassment First or Second Degree or Stalking occurred in 9-8-2018.
4. Plaintiff further alleges that the following conduct occurred by the defendant on the times, dates, and places listed below, and such conduct falls within the definition of:
 - HARASSMENT, FIRST DEGREE (§16-3-1700 (A)), or
 - HARASSMENT, SECOND DEGREE (§ 16-3-1700 (B)), or
 - STALKING (§ 16-3-1700 (C)).
5. On September 9, 2018, at 2:59 O'clock, A.M., at Union, S.C., which is in Union County, S.C., the conduct complained of occurred when the defendant:

sent Facebook messages to invite Plaintiff's
suicide, threaten his life and other words to
inflict emotional duress on Plaintiff.

On September 11, 2018, at 8:04 O'clock, A.M., at Union SC, which is in Union County, S.C., the conduct complained of occurred when the defendant:

sent plaintiff Facebook messages threatening to
deprive Plaintiff of the opportunity to attend his
mother's funeral

On September 12, 2018, at 2 pm O'clock, A.M., at Union, S.C.
which is in Union County, SC, the
conduct complained of occurred when the defendant:

gas when the gas company discovered large amounts of
gas were used at 318 Glenale Road
Union, S.C., with no explanation.

(State details of harassment/stalking and other facts and circumstances upon which relief is sought above. Attach additional sheets if necessary.)

6. Plaintiff requests: (Check one or more)

- a. That the defendant be enjoined from abusing, threatening to abuse, or molesting the plaintiff or members of the plaintiff's family.
- b. That the defendant be enjoined from entering or attempting to enter the plaintiff's place of residence, employment, education, or other location.
- c. That the defendant be enjoined from communicating or attempting to communicate with the plaintiff in a way that would violate Article 17, Chapter 16 of the 1976 South Carolina Code of Laws, as amended.


SWORN to and Subscribed before me)

This 14 day of September 2018)

Melody M. Whitstone)

Notary Public for South Carolina)

My Commission expires: 9-7-2027)



Signature of Plaintiff or Person Filing
on Behalf of Plaintiff

NOTICE: THE NON-PREVAILING PARTY IN THIS ACTION IS ASSESSED A FILING FEE OF EIGHTY DOLLARS (\$85.00). THE COURT MAY HOLD A PERSON IN CONTEMPT OF COURT FOR FAILURE TO PAY THIS FILING FEE. §16-03-170(D).

Affidavit of Harold Estes Blackwell, Jr.

Harold Estes Blackwell, Jr.
315 Glendale Road
Union, South Carolina 29379

RECEIVED
SEP 20 2018
SC Court of Appeals

To Whom it May Concern,

My name is Harold Estes Blackwell, Jr.

Each of the facts alleged herein are of my personal knowledge and/or upon information or belief.

I reside at 315 Glendale Road, Union, South Carolina.

I am a citizen of the United States of America.

Upon information and belief, Toby Woodard resides at 206 Brandt Drive,
Travelers Rest, South Carolina in Greenville County, South Carolina.

William (Bill) Eugene Greene, Jr., lives at 1011 Willow Creek Court, Chapin, South Carolina, in
Lexington County.

On June 15, 2016, at approximately 10:15 pm, I was using Facebook profile "Lynn
Estes," which I created. I left a message on my estranged wife's Facebook "news feed." Exhibit D is the
"conversation" with Toby Woodard which ensued.

The items marked Exhibit A, B and D attached hereto are documents I created and are verbatim
representations of the communications referenced. The production of the Facebook Instant Messenger
exchanges between myself and Bill Greene, me posing as Lynn Estes, as well as Hal Blackwell, and Toby
Woodard are attached as Exhibit A, B & D and were accomplished by copying the communications from
the Instant Messenger electronic documents, then pasting them into a Microsoft Word document before
printing using Microsoft Office software.

This affidavit was prepared to accompany Appellant's Motion for Appendix and New Theories of
Recovery.

Exhibit A contains the words Bill Greene used Facebook private messages on September 8, 2018. The words in Exhibit A are unaltered copies of that conversation copied from the Facebook website using Microsoft Office software.

Exhibit B contains the Bill Greene sent me on Facebook private messenger on September 10, 2018. The words in Exhibit B are unaltered copies of that conversation copied from the Facebook website using Microsoft Office software.

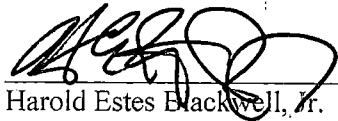
Exhibit D is a Facebook Instant Messenger exchange between Toby Woodard and me.

I am the person Toby Woodard refers to as "Hal" in Exhibit D.

These words attributed to "Toby" in Exhibit D regarding "Hal" are not true.

I, Harold Estes Blackwell, Jr., do so state, under the penalty of perjury, each item listed above is truthful to the best of my knowledge and is in no way misleading.

Signed, under penalty of perjury,



Harold Estes Blackwell, Jr.

Signed this 17th day of May, 2018
at Union, South Carolina.

Notary Public:

Arny L. Kuykendall
my commission expires 7/28/20

Harold (Hal) E. Blackwell, Jr.
315 Glendale Road
Union, South Carolina 29379
(864) 303-7000

September 18, 2018

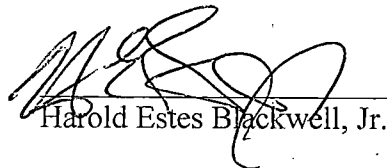
Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Blackwell v Miracle Hill Appellant Case No. 2017-002618

Dear Ms. Kitchings:

Please find enclosed Appellant's Motion to Append and New Theory of Recovery along with the necessary documents. If you have any questions please let me know.

Sincerely,



Harold Estes Blackwell, Jr.

cc: Amy Miller Snyder, Esquire
Adam Crittenden Bach, Esquire
Carrie Hailman OBrien, Esquire
Melegia Lee Daniels, Esquire

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(864) 303-7000
halblackwell@gmail.com

J. Abbott
South Carolina
Columbia, SC



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