

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas
Case No. 2015-CP-46-03179

RECEIVED
OCT 16 2018
SC Court of Appeals

JOHN C. HAYES, III, Circuit Court Judge

Appellate Case No. 2016-002488

City of Rock Hill,

Respondent,

v.

Triando M. Stroud,

Appellant.

RESPONDENT'S OBJECTION TO PROOF OF SERVICE FILED BY APPELLANT

Now comes the City of Rock Hill, by and through the undersigned counsel, who respectfully requests and moves this Court to reject the Proof of Service filed by the Appellant in this matter regarding his motion to reinstate the appeal.

Respondent in recently checking the South Carolina Appellate Case Management System (a/k/a C-Track) discovered that Appellant filed a proof of service with this Court purporting that Appellant properly served the Respondent with a copy of his motion to reinstate the appeal. To date and including his most recent filing Appellant has once again failed to properly serve Respondent.

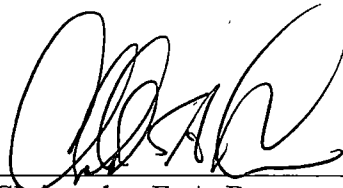
In reviewing the document filed by the Appellant captioned Proof of Service recently filed in this matter (a copy is attached to this objection as Respondent's Exhibit A) the certified letter was mailed to the City of Rock Hill Municipal Court and was signed for by Mr. Tim Butz

the court bailiff. Neither the Municipal Court nor Mr. Butz represent the City of Rock Hill in this matter. Respondent has previously indicated to both this Court and Appellant that he has failed to properly serve the Respondent with his court filings. First in Respondents Motion to Dismiss filed on October 12, 2017 and in Respondents reply to Appellants first motion to reinstate the appeal filed on April 20, 2018 Respondent noted that the Appellant continues to fail to properly serve Respondent.

All of Respondent's correspondence with the Appellant has had a cover letter on the Solicitor's Office letterhead with the proper address of the Solicitor's Office both in the signature line and at the bottom of the letterhead. Respondent can only assume at this point in time that the Appellant simply has no interest whatsoever in properly and timely serving the Respondent with documents and correspondence related to this case.

Respondent submits this objection as an additional ground to deny Appellant's second motion to reinstate his appeal.

October 12, 2018



Christopher E. A. Barton
201 E. Main St., 3rd Floor
Rock Hill, South Carolina 29730
(803) 329-5692
SC Bar No: 65261
Attorney for Respondent

Exhibit A

Proof Of Service

I Triando Stroud is sending proof of service by sending Mr. Christopher Barton the same documents that were sent to Court of Appeals for motion to reinstate. For any questions or more info contact me at 803.524.1770 or mail to this address 4715 ForestRidge Commons Dr. Charlotte, Nc 28269. Thanks In Advance!



Sincerely, Triando Stroud

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: Christopher Baeten 120 E Black St Rock Hill, SC 29730</p>	<p>B. Received by (Printed Name) TIM BUTZ</p>	<p>C. Date of Delivery</p>
<p>2. Article Number (Transfer from service label) 5 3010 0001 1074 6076</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) 	<ul style="list-style-type: none"> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery 	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt</p>		

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: 1220 Seneca St Columbia, SC 29201</p>	<p>B. Received by (Printed Name)</p>	<p>C. Date of Delivery</p>
<p>2. Article Number (Transfer from service label) 15 3010 0001 1074 5390</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) 	<ul style="list-style-type: none"> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery 	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt</p>		

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United States
Postal Service

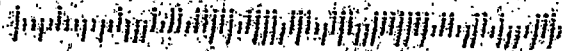
• Sender: Please print your name, address, and ZIP+4® in this box •

Triando Stroud
4715 Forestridge Commons Dr
Charlotte, NC 28269

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SC Court of Appeals



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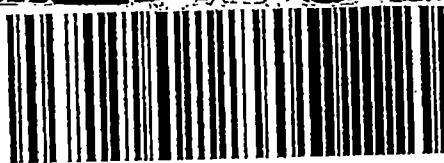
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• Sender: Please print your name, address, and ZIP+4® in this box •

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4715 Forestridge Commons Dr
Charlotte, NC 28269



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4715 Forest Ridge Commons Dr.
Charlotte NC 28269



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Court of Appeals
1220 Senate St.
Columbia, SC 29201



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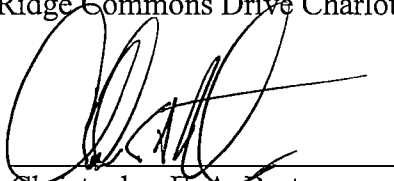
v.

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Appellant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Respondent's Objection to Proof of Service has been served upon the Appellant by mailing a copy via regular U.S. Mail to him on the 12 day of October, 2017, Triando Stroud 4715 Forest Ridge Commons Drive Charlotte, NC 28269.



Christopher E. A. Barton
201 E Main Street, 3rd Floor
Rock Hill, South Carolina 29730
(803) 329-5692
SC Bar No: 65261



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October 12, 2018

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

RE: City of Rock Hill, Respondant v. Triando M. Stroud, Appellant
Case No. 2016-002488

Dear Ms. Kitchings:

Enclosed please find for filing the original and one (1) copy of the Respondant's Objection to Proof of Service filed by Appellant and our Certificate of Service in regards to the above-referenced case. Please return a clocked copy for our file.

With kindest regards,

Christopher E. A. Barton

cc: Triando Stroud
4715 Forest Ridge Commons Drive
Charlotte, NC 28269

CITY OF ROCK HILL SOLICITOR'S OFFICE

201 E. MAIN STREET, 3RD FLOOR, ROCK HILL, SOUTH CAROLINA 29730
OFFICE 803/329-5619 FACSIMILE 803/326-3865



CITY OF ROCK HILL SOLICITOR'S OFFICE
201 E. MAIN STREET, 3RD FLOOR
ROCK HILL, SC 29730



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