

STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Master-In-Equity

Michael R. Scarborough, Judge

Case Number- 2017-CP-10-4490

PATRICIA McGILLAN..... RESPONDENT

-vs-

JAMES COOLEY..... APPELLANT

NOTICE OF APPEAL

I, James Cooley, certify, that I served copies of the Notice of Appeal on Respondent, by delivering, a copy of same to the law offices of her attorney, Susan Gaddy, Esq., where I left it with one of her office personnel, Jessica, on August 30, 2018.

October 19, 2018

*James B. Cooley*  
James Cooley,  
Appellant  
1508 Pine Island View  
Mount Pleasant, SC 29464  
703 623-9410

Other Counsel of Record:  
Susan McDonald Gaddy, Esq.  
1156 Bowman Road, Ste. 200  
Mt. Pleasant, SC 29464

RECEIVED

NOV 01 2018

SC Court of Appeals

STATE OF SOUTH CAROLINA )  
 )  
 )  
**Patricia McGillan,** )  
 Appellee, )  
 v. )  
 )  
**James Cooley,** )  
 Appellant. )

IN THE COURT OF APPEALS  
 FOR THE DISTRICT OF SC  
 APPEAL NO.: 2018-0011592

**AFFIDAVIT OF SERVICE  
 and CERTIFICATE of SERVICE**

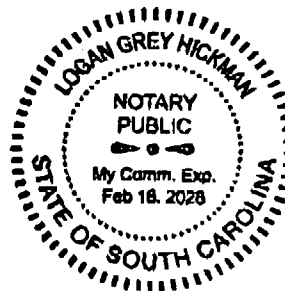
AFTER first having been sworn, the undersigned says the following:

I certify that on October 1, 2018, I went personally to the Charleston County Clerk of Court's Office to request a copy of the transcript from my case, # 2017-CP-10-4490. A woman in the clerk's office told me that I needed to make my request at the Master-In-Equity. I went upstairs to that office and told the receptionist I needed the transcript. She told me that I could only get the transcript from Christine Smith and that she would put my request on Ms. Smith's desk. She did not tell me I needed to file a written motion, so I left my written request at the Master-In-Equity for Ms. Smith; then took a copy of the request to the office of Susan McDonald Gaddy, Esq., Patricia McGillan's attorney.

*James B. Cooley*  
 James Cooley, Appellant

SWORN AND SUBSCRIBED TO BEFORE ME  
 THIS 31st day of October, 2018

*Logan Grey Hickman*  
 NOTARY PUBLIC FOR South Carolina  
 My commission expires: 2/16/28



**RECEIVED**

NOV 01 2018

SC Court of Appeals

James B. Cooley  
1508 Pine Island View  
Mount Pleasant, SC 29464

October 1, 2018

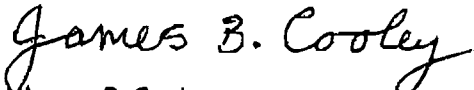
Christine A. Smith, Court Reporter  
Charleston County Judicial Center  
100 Broad Street, Suite 266  
Charleston, SC 29401

RE: Case number 2017-CP-10-4490

Dear Ms. Smith:

I am requesting a copy of the transcript from Case number 2017-CP-10-4490. The date of the hearing was June 21, 2018. I understand the cost of the transcript is going to be \$195.00 which will be picked up and paid when it's ready.

Sincerely,

  
James B. Cooley

State of South Carolina

County of Charleston

Patricia McGillian

Vs.

James Cooley

IN THE SOUTH COURT OF APPEALS

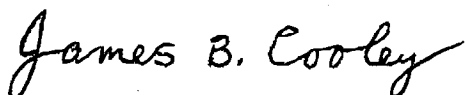
Appellate Case No. 2018-001592

Motion Requesting Permission to Order

Transcript

I am making a motion requesting permission to order the transcript directly from the court reporter, outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules.

Respectfully,



James B. Cooley  
1508 Pine Island View  
Mount Pleasant, SC 29464

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Mikell R. Scarborough, Master In Equity

Case No. ~~2010-CP-40-5886~~  
2017-CP-10-4490

Patricia M. McGillan

Respondent

V.

*James  
JBC*

~~Seamus B. Cooley~~

Appellant

FILED  
2018 AUG 31 AM 10:09  
JULIE J. AMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

NOTICE OF APPEAL

Seamus B. Cooley appeals the order of the Honorable Mikell R. Scarborough dated August 3, 2018. Appellant received written notice of entry of this order on August 6, 2018.

August 30, 2018

*James B. Cooley*  
**JAMES** ~~Seamus B. Cooley~~  
1508 Pine Island View  
Mount Pleasant, SC 29464  
(703) 623-9410

Other Counsel of Record  
Susan Gaddy  
1156 Bowman Rd. Ste. 200  
Mount Pleasant, SC 29464  
Attorney for Respondent  
843-388-7062

FILED  
2018 AUG 14 PM 2:03  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

August 13, 2018

Your Honor,

I am requesting that you should reconsider changing your decision.

Reason #1. When Patricia was in the witness box she was asked either by your good self or by someone else whether she looked into the possibility of a reverse mortgage. Her answer was that she spoke to two different companies that I brought to her attention and her answer was under oath that we would have to be married to qualify. This was not true. They were government funded mortgages and we did not need to be married to qualify.

Reason #2. She brought me to the United States. She put in a thousand applications in the mail system for a green card and I got picked. She then went to Ireland and helped to close down my mechanical shop. We packed up my tools and shipped them to DC where she lived in 1992. She was also my sponsor. Since the hearing I have spoken to Homeland Security and I told them what transpired. They asked me if I was a United States citizens and the answer was no. They asked me if I had worked 15 years in the United States. I answered no to that question also. Then they told me that I needed to find a good lawyer and make an appointment and visit Homeland Security in Charleston, South Carolina. I have an appointment for August 20, 2018.

Reason #3. If this house was sold I would have no place to live. I am a man going on 72 years of age with a lot of health issues and a three and a half old dog with special needs.

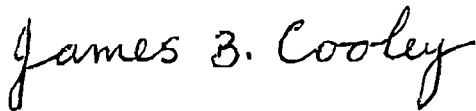
Reason #4. Since the hearing I have been able to secure a reverse mortgage in my own name, so that would get rid of her \$3500.00 per month. She has often talked about letting the house go back to the bank, rather than pay the mortgage payments. What I proposed for her to do is to help me a little up front with the reverse mortgage, until I can get a room or two rented. Then I can make it on my own. I also proposed to sign over the entire house to Tricia when I no longer have a use for it. After all she is the only family I have here in the United States. I am going on 72 years old with only \$125.00 coming in a month on social security. I have to use my savings which will run out soon if this house issue isn't sorted out soon. Your honor, Tricia doesn't need the assistance of the court. She is a 61-year-old attorney with a nursing degree and with a high salary, savings, and her own house. She is highly educated. I am at the other end of the scale. I have no education. She did not care 26 years ago that I was uneducated. It was a nonissue. Now she is taking advantage of it. . . getting a big profile accountant to put together what and who put money in the 1508 Pine Island View, Mount Pleasant home. That was never done before with any of the other four properties. She never expected at any time before that I would match dollar for dollar with her on the upkeep of the property. After all, she had given me a credit card since I came over 26 years ago.

So your Honor, I am asking that you and your good office please throw out this case, since it should never have gotten to your court in the first place. This is more of a Family Law case than a Partitioning of Property case. I am going to have to file a case against Tricia for the way she has been mistreating me for the past two years, for removing three cars I was working on in my home in Louisville, Kentucky. She gave one back to a customer after I had restored it and she didn't even ask for payment. She put two other cars in storage and wants me to pay the storage fees on those. She also put all my clothes and

me to put all my things from the Mount Pleasant address into storage and to pay rent for that. Remember I have an income of \$150.00 a month. She has transferred the phone, electricity and water bills to my name. I lost my medication insurance moving from Kentucky to South Carolina, so I had to drop one of my heart medications, because I could not afford it. I have a lot of medical issues going on and after that she is still not happy until she sells the house right out from underneath me and my dog (a rescue dog from North Charleston where she was used as a bait dog for pit bulls and after two surgeries to save her life and to fix her neck she is now left with a problem where she can't feed out of a bowl. Instead I have to feed her kibble by hand two times a day.) Tricia has three dogs of her own . . . the downfall of our relationship. She brought them home and plunked them between us in bed, so I got pushed out to the floor and had to move in to the spare room. Before this happened she used to tell me she loved me but now she loves the dogs. So I got replaced by three dogs. We were so close before the dogs arrived.

Your Honor, this information should have come out during the hearing for you to make a more informed decision, but I did not have an attorney represent me, which was a big mistake when there was so much at stake.

Sincerely,



James B. Cooley

Prepared By Christee  
at the Library