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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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SC Court of Appeals

Appellate Case No. 2019-000422

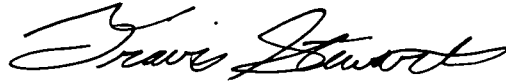
\_\_\_\_\_  
Aspyre Assembly Station, Respondent  
  
v.  
  
Travis Stewart, Appellant  
\_\_\_\_\_

MOTION AND MEMORANDUM  
FOR LEAVE OF COURT TO AMEND  
NOTICE OF APPEAL, <sup>submit documents for notice of appeal</sup> PROOF OF SERVICE FOR NOTICE OF APPEAL, <sup>Amended BU 4/12/19</sup> AND ~~REDACT~~ <sup>submit BU 4/12/19</sup> MOTION AND MEMORANDUM TO STAY RESPONDENT'S WRIT OF EJECTMENT, AND COMPEL RETURN OF SCE&G UTILITIES, ADD LITIGANTS TO COMPLAINT

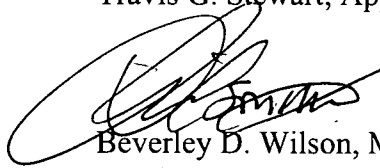
Appellant Travis Stewart Motions the Court for Leave of Court to Amend the Notice of Appeal, <sup>submit</sup> ~~Memorandum for Notice of Appeal~~ <sup>BU 4/12/19</sup> and Proof of Service submitted March 15, 2019 along with proof of that Proof of Service's submission via U.S. First Class Mail due to extreme extenuating circumstances associated with repeated robberies of Appellant's home in Orangeburg, South Carolina resulting in \$150,000 to \$170,000 of items, <sup>stolen BU 4/12/19</sup> and difficulties securing proper investigation of and prevention of further thefts from same by the local police department. The repeated robberies have worsened Appellant's PTSD and major depression resulting from the Assault and Battery Appellant suffered from Respondent 's Tiffany Maddox, assistant residential manager of Aspyre at Assembly Station, disrupted his academic studies at the University of South Carolina and prevented timely attention to an ability to adhere to the requests of the Court which were not known until April 11, 2019. Appellant begs the Court's forgiveness and permission to submit these documents to the court.

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Respectfully,



Travis G. Stewart, Appellant



Beverley D. Wilson, M.D.

*Pro Se* Power of Attorney for Appellant

P.O. Box 21612

Charleston, South Carolina 29413

Telephone: (803)724-7560

Other Counsel of Record

Thomas I. Howard, Jr.

Brownlee Whitlow & Praet, PLLC

3255 Landmark Drive, Suite 301

North Charleston, South Carolina 29418

Attorney for Respondent

Telephone: (843)628-7120

Facsimile: (843)628-0847

SUBMITTED this 15<sup>th</sup> day of April 2019.

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appellate Case No. 2019-000422

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Walton J. McCleod, Circuit Court Judge

Appellate Case No. 2018-CP-40-04557

Caroline Streater, Magistrate Court Judge

Original Trial Case No. 2018CV4010800184

Aspyre Assembly Station

Respondent

V.

Travis Stewart

Appellant

AMENDED PROOF OF SERVICE

I respectfully submitted the **Motion for Leave of Court for Motion to Amend the Notice of Appeal and Amend the Proof of Service for the March 15, 2019 Proof of Service in this matter to accompany the previously March 15, 2019 Motion and Memorandum to Stay Execution of Respondent's *Writ of Ejectment*, to Compel Respondent to Facilitate Return of SCE&G Utilities for Apartment 3106 to Appellant, and to Add Amanda Bidinger, Alisa Liggett, and the University of South Carolina's Office of Student Conduct as Co-Plaintiffs and Beverley D. Wilson as Co-Defendant to Complaint** by depositing same in April 12, 2019 United States Postal Service with sufficient postage for First Class mail to opposing counsel, Mr. Thomas I. Howard, Jr. at the address listed below.

Sincerely,



Beverley D. Wilson, M.D.

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*Pro Se* Power of Attorney for Appellant  
P.O. Box 21612  
Charleston, South Carolina 29413  
Telephone: (803)724-7560

Other Counsel of Record  
Thomas I. Howard, Jr.  
Brownlee Whitlow & Praet, PLLC  
3255 Landmark Drive, Suite 301  
North Charleston, South Carolina 29418  
Attorney for Respondent  
Telephone: (843)628-7120  
Facsimile: (843)628-0847

SUBMITTED this 12<sup>th</sup> day of April 2019.

April 12, 2019

Beverley D. Wilson, M.D.  
Post Office Box 21612  
Charleston, South Carolina 29413  
(803)724-7560  
Email: bdwilson@charlestonlaw.edu

South Carolina Court of Appeals  
Clerk of Court  
Jenny Abbott Kitchings  
1220 Senate Street  
Columbia, SC 29201  
(803)734-1890  
(803)734-1839 (fax)

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SC Court of Appeals



Re: Aspyre Assembly Station, Respondent vs. Travis Stewart, Appellant  
Appellate Case Number: 2019-000422  
Appellate Case Number: 2018-CP-40-04557  
Original Trial Case No: 2018CV4010800184

Dear Ms. Kitchings:

I respectfully submit a <sup>Amended</sup> Motion for Leave of Court to Submit an **Amended Notice of Appeal, Memorandum for Notice of Appeal**, and an **Amended Proof of Service** to file with the March 15, 2019 submitted **Motion and Memorandum to Stay Execution of Respondent's Writ of Ejectment, to Compel Respondent to Facilitate Return of SCE&G Utilities for Apartment 3106 to Appellant, and to Add Amanda Bidinger, Alisa Liggett, and the University of South Carolina's Office of Student Conduct as Co-Plaintiffs and Beverley D. Wilson as Co-Defendant to Complaint** to the South Carolina Court of Appeals from the February 15, 2019 Final Order of the Honorable Walton J. McCleod, Presiding Circuit Judge of the Richland County Court of Common Pleas Affirming Judgment of the Honorable Caroline Streater, Presiding Magistrate Judge Richland County Central Magistrate's Court for *Writ of Ejectment*. I am also enclosing the Power of Attorney for Appellant Travis Stewart assigned to Beverley D. Wilson, M.D. authorizing legal representation of, and litigation on behalf of Appellant.

I enclose herewith a copy of the Proof of Service that the above documents were submitted in today's mail along with the Amended Proof of Service from March 15, 2019 with proof of that purchased postage label to opposing counsel, Mr. Thomas I. Howard, Jr. and am presenting copies of same to the Honorable Judge Walton McCleod of the Richland County Court of Common Pleas. Please time stamp these documents and immediately file them with the South Carolina Court of Appeals.

Sincerely,

  
Travis G. Stewart, Appellant  
  
Beverley D. Wilson, M.D.  
*Pro Se* Power of Attorney for Appellant

F



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