

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

MAY 02 2019

**SC Court of Appeals**

---

APPEAL FROM LANCASTER COUNTY  
Court of Commons Pleas  
The Honorable John C. Hayes, III

---

Case No.: 2012-CP-29-498  
Appellate Case No.: 2017-002223

Mark Wilson .....Appellant,

v.


Keith Jayma .....Respondent.

---

**PROOF OF SERVICE**

---

The undersigned certifies that he has served Respondent's Final Brief by depositing a copy of same in the United States Mail, postage prepaid, on April 30, 2019, addressed to pro se Appellant, Mark Wilson, 2506 Kings Farm Way, Indian Trail, NC 28079.

  
\_\_\_\_\_  
W. Keith Martens  
HAMILTON MARTENS, LLC  
P.O. Box 10940  
Rock Hill, South Carolina 29731  
(803) 329-7672  
[keith.martens@hamiltonmartens.com](mailto:keith.martens@hamiltonmartens.com)  
ATTORNEYS FOR RESPONDENT

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM LANCASTER COUNTY  
Court of Commons Pleas  
The Honorable John C. Hayes, III

MAY 02 2019  
SC Court of Appeals

Case No.: 2012-CP-29-498  
Appellate Case No.: 2017-002223

Mark Wilson .....Appellant,

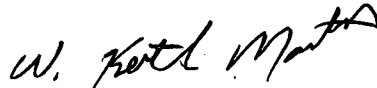
v.

Keith Jayma .....Respondent.

**CERTIFICATE OF COUNSEL**

The undersigned hereby certifies that the Final Brief Respondent complies with Rule 211(b), SCACR.

April 30, 2019



W. Keith Martens  
Hamilton Martens, LLC  
P.O. Box 10940  
Rock Hill, South Carolina 29731  
(803) 329-7672  
[keith.martens@hamiltonmartens.com](mailto:keith.martens@hamiltonmartens.com)  
Attorney for Respondent

OTHER PARTY OF RECORD:  
Mark Wilson, Pro Se  
2506 Kings Farm Way  
Indian Trail, NC 28079



HAMILTON  
MARTENS  
ATTORNEYS AT LAW

L. Melia Sweatt  
Paralegal  
803-329-7702  
[melia.sweatt@hamiltonmartens.com](mailto:melia.sweatt@hamiltonmartens.com)

April 30, 2019

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

**RECEIVED**

MAY 02 2019

SC Court of Appeals

RE: *Mark Wilson v. Keith Jayma*  
Appellate Case No.: 2017-02223

Dear Ms. Kitchings:

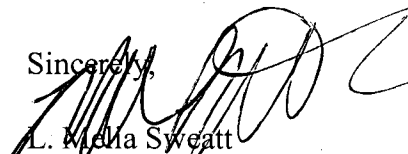
I have enclosed fifteen (15) copies of Respondents Final Brief and Certificate of Service in connection with the above matter. Also enclosed is Certification of Counsel.

This file has been unusual as the Record on Appeal and Supplemental Record on Appeal filed by the Appellant has had several deficiencies. Departing from the norm, Respondent's counsel requested permission to file a Second Supplemental Record on Appeal to include missing documents from its Designation of Record. The request was granted, as evidenced by the attached letter from the Court dated March 21, 2019. The last line of the letter indicates that "the parties will then be given a deadline for their initial briefs". Counsel interpreted this to mean that the Court would determine a revised briefing schedule and notify counsel of same. However, when I called the Court this morning to follow up on this schedule, Amelia informed me that the Briefs of Appellant and Respondent should have been filed twenty (20) days from the date of filing the Supplemental Record on Appeal, Volume II, or April 20, 2019. In light of this conversation, please let me know if the Court will require a Motion to File Respondent's brief out of time.

As evidenced by the enclosed Certificate of Service, I have forwarded a copy of the Respondent's Final Brief to the pro se Appellant.

Thank you for your assistance in this matter.

Sincerely,



L. Melia Sweatt  
Paralegal for the Firm

/lms  
Enclosure

Hamilton Martens, LLC\*

241 Oakland Avenue (29730) • Post Office Box 10940 (29731) • Rock Hill, South Carolina  
Phone: 803.329.7672 • Facsimile: 803.329.7678 • [www.hamiltonmartens.com](http://www.hamiltonmartens.com)

\*Herbert W. Hamilton, Retired

cc: Mark Wilson, Pro Se  
2506 King's Farm Way  
Indian Trail, NC 28079

HASLER  
PRIORITY MAIL  
\$008.30<sup>00</sup>  
04/30/2019 ZIP 29730  
012014607617  
US POSTAGE



HAMILTON  
MARTENS  
ATTORNEYS AT LAW  
241 Oakland Avenue, Rock Hill, SC 29730  
Post Office Box 10940, Rock Hill, SC 29731

**RECEIVED**

MAY 02 2019

SC Court of Appeals

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