

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

Honorable R. Lawton McIntosh, Circuit Court Judge

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Case No.: 2017-002386

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Windy Hill MHP, LLC,

Respondent,

v.

Chris Holcombe,

Appellant.

**RECEIVED**

JUL 22 2019

SC Court of Appeals

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**Return to Motion Dated June 5, 2019**

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Counsel for Appellant:

Chris Holcombe  
Pro Se  
138 Brookstone Dr.  
Easley, SC 29642

Counsel for Respondent:

Ralph Gleaton  
Gleaton Law Firm, PC  
PO Box 5739  
Greenville, SC 29606  
(864) 444-4178

Respondent opposes the letter motion of the Appellant dated June 5, 2019. Appellant sent this Court a letter dated June 13, 2019 and copied Respondent. That letter asked this Court to award the Appellant one million dollars for “emotional, physical and psychological stress and damages” for various reasons. The Clerk of Court responded to Appellant by a letter dated July 9, 2019 stating that if Appellant wanted to “make a request of this Court, [he] must file a motion in

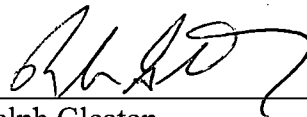
accordance with Rule 240 of the South Carolina Appellate Court Rules.” The Clerk of Court’s letter further stated that no action would be taken on his correspondence. Appellant then served on Respondent the same letter, this time dated June 5, 2019 that added a first sentence stating, “I ask the court to accept this motion and amend it to the case, Case No. 2017-002386 Windy Hill as the Respondent v. Chris Holcombe as the Appellant.”

To the extent letter dated June 5, 2019 is accepted by this Court as a motion, Respondent opposes the letter motion and requests that this Court deny the motion on the following grounds.

1. The letter motion does not comply with Rule 240(c) and (d) SCACR and this Court should deem the motion abandoned pursuant to Rule 240(g) SCACR.
2. This matter was not raised at the magistrate’s court or circuit court or ruled on by either court. “An issue may not be raised for the first time on appeal. In order to preserve an issue for appeal, it must be raised to and ruled upon by the trial court.” *In re Michael H.*, 360 S.C. 540, 602 S.E.2d 729 (2002), citing *Wilder Corp. v. Wilke*, 330 S.C. 71, 497 S.E.2d 731 (1997).
3. This Court lacks jurisdiction over this matter because it is not an appeal from an order, judgment, or decree of the circuit court. S.C. Const. art. V, § 9, and SC Code § 14-8-200.

July 18, 2019

Respectfully submitted,



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Ralph Gleaton  
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PO Box 5739  
Greenville, SC 29607  
(864) 444-4178  
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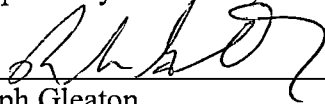
Proof of Service

I, Ralph Gleaton, certify on this date, July 18, 2019, I served the Respondent's Return to Motion Dated June 5, 2019, dated July 18, 2019 on the Appellant, Chris Holcombe, by depositing it in the U.S. Mail, in an envelope with sufficient postage affixed, addressed as follows:

Mr. Chris Holcombe  
138 Brookstone Dr.  
Easley, SC 29642

July 18, 2019

Respectfully submitted,



Ralph Gleaton  
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PO Box 5739  
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ralph@gleatonlaw.com

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**GLEATON LAW FIRM, PC**

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GREENVILLE, SC 29606  
(864) 444-4178**

July 19, 2019

Jenny Abbot Kitchings, Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Holcombe v. Windy Hill MHP, LLC  
Case NO. 2017-002386

Dear Ms. Kitchings:

Enclosed please find the original and six copies of the Respondent's Return to Motion Dated June 5, 2019 in the above-reference case for filing with your office.

Thank you for your assistance in this matter.

Cordially yours,



Ralph Gleaton

Enclosures

cc: Chris Holcombe  
138 Brookstone Dr.  
Easley, SC 29642

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