

Exhibit

Filing Date
Jan 17, 2017

THE STATE OF SOUTH CAROLINA

in the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

MASTER-IN-EQUITY LAW COURT

Mikell R. Scarborough, Master-In-Equity Law Judge

RECEIVED

FEB 06 2019

SC Court of Appeals

Case No. 2016-001201

Allen Livingston,.....Respondent,

v.

Harold Simmons Jr.,.....Appellant.

Appellant

Motion For Amend
BRIEF Counter Claim

To the Court and to the Respondent(s):

File Fee^B 50.00
File Fee
Jan 27, 2019

Ⓛ 034

Statement of the Counter Claim Case Amend

On 6-15-2000 Appellant Harold Simmons And Respondent Allen Livingston Enter in agreement Contract For Property located at 3042 North Carolina Ave North Charleston, S.C. 29405, At A Purchaser Price of \$125,000.00 with NO Interest At \$500.00 Monthly. For Seven 7 years Appellant Harold Simmons Made Timely And AVANCE payments AS agreed upon this made Appellant Harold Simmons Allways \$9000.00 or more paid up in AVANCE Exhibit A

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SC Court of Appeals

As of 10-9-2007 Case Filed is A Frivolous, Deception, Malicious Fraud, Perjury, and Forgery - Case Filed NO:07-1769 Respondent Allen Livingsston And His Attorney Jeffrey Barnwell File with Magistrate's Court Application For Ejectment \$7000.00 Back Rent, with A Forgery and Alter Contract All the way up the Court of Common Pleas, Charleston County Sheriff Office order for ejectment, Back to Court of Common Pleas to the South Carolina Court of Appeals, to Charleston Court of Common Pleas For a Fraud Default order, to Master-in-Equity. Evidence will Be giving to support Claim.

Harold Simmons
Harold Simmons

Jan 27, 2019

(2)

Exhibit T Court Received
Mail Certified
6-4-2014

THE STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS
Cause No. 2014 CP 10 1635

ALLEN LIVINGSTON)
Plaintiff,)
-versus-)
HAROLD SIMMONS JR.)
Defendant.)

COUNTERCLAIM
(Jury Trial Requested)

FILED
2014 JUN 12 AM 10:27
JULIE L. FARRINGTON
CLERK OF COURT
BY

Defendant, Harold Simmons Jr. states he has a claim against the plaintiff in the amount of \$600,000.00

The counterclaim arose out of the same transaction or occurrence as the plaintiff's claim as a result of the following events:

FACTUAL AND PROCEDURAL BACKGROUND

This instant motion arises from a foreclosure case. The Defendant, Harold Simmons Jr. came into a Lease to Buy Agreement with Plaintiff for property located at 3042 N. Carolina Ave, North Charleston, SC 29405, as evidenced by a copy of said Agreement attached hereto as Exhibit "A" and incorporated by reference. The Plaintiff, Allen Livingston has consistently filed and pursued the defendant on several frivolous claims, not showing good faith, no legitimate justification for any actions, constant violation of the statute of frauds, slander, and for no other purpose but to embarrass, delay, or burden the Defendant. The actions filed by the Plaintiff are malicious and have indicated that the actions are being brought merely as a means of harassment.

JAN 27, 2019
Court Received
Mail Certified
6-4-2014

June 12 2014
Received Call from Clerk
of Court Miss Trusee stating
Defendant Need to come in
And sign cover sheet.

3

2

ra

Feb 2, 2019

Court of Appeals
You will Find

- ① motion For Extension For letter Date Dec 28, 2018
- ② motion For Amend Brief of Appellant Reply to Respondent
- ③ motion For Amend Brief Counter Claim

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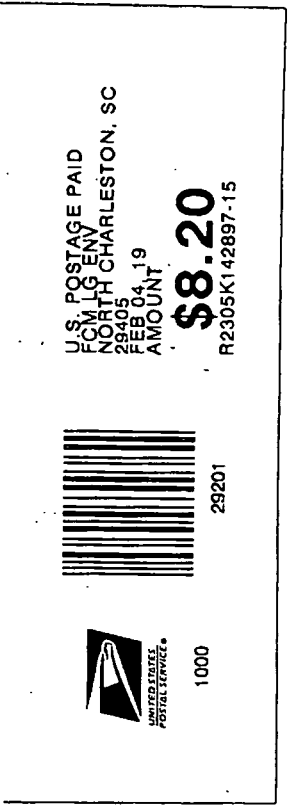
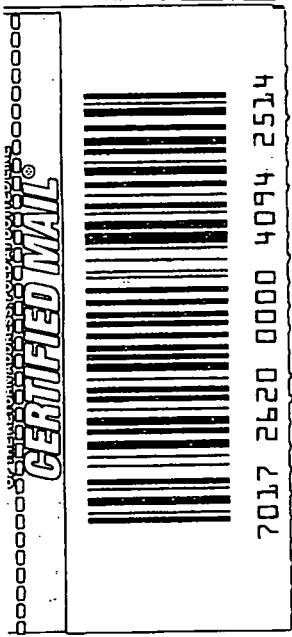
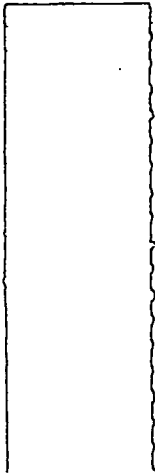
FEB 06 2019

SC Court of Appeals

Harold Simmons
3042 North Carolina Ave
North Chas. SC. 29405
843-4808694

J

D Simmons
North Carolina Ave
Chas S.C. 29405



South Carolina Court of Appeals
1220 Senate Street
Columbia 2 South Carolina
29201

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SC Court of Appeals