

STATE OF SOUTH CAROLINA
In The Court Of Appeals

RECEIVED
DEC 30 2019
SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2018-001387

Patricia LutzAppellant

v.

Eastpoint Properties, LLC and Scollon Family Partnership, LLC.....Respondents

**RESPONDENTS EASPOINT PROPERTIES, LLC AND
SCOLLON FAMILY PARTNERSHIP, LLC'S
REPLY TO MOTION TO REINSTATE ABOVE CASE**

Respondents Eastpoint Properties, LLC and Scollon Family Partnership, LLC (collectively "Respondents") jointly reply to the Motion to Reinstate Above Case ("Motion to Reinstate") filed by Appellant Patricia B. Lutz ("Appellant") on December 20, 2019 and submit that the same should be denied.

As set forth in the Motion to Reinstate, Appellant claims that she was told by someone with the South Carolina Court of Appeals to wait for instructions because it did not notify Harrell, Martin & Peace, P.A. that she had filed on time. Appellant does not state what she filed on time. While the undersigned makes no claim regarding the veracity of Appellant's statements, it appears from the records of the South Carolina Court of Appeals that Respondents filed Respondents Eastpoint Properties, LLC and Scollon Family Partnership, LLC's Reply to Motion to Late Filing and Motion to Dismiss on July 31, 2019, a copy of which is attached hereto as **Exhibit A**, and the

Court entered an Order requiring Appellant to file her initial brief and designation of matter no later than September 3, 2019 (“Order Allowing Late Filing”). A copy of the Order Allowing Late Filing and corresponding cover letter are attached hereto as **Exhibit B**. The Order Allowing Late Filing was mailed to the Appellant at her address on file with the South Carolina Court of Appeals. (See **Exhibit B**.) The Order Allowing Late Filing was entered in response to Appellant’s Motion to Allow Late Filing filed July 22, 2019, a copy of which is attached hereto as **Exhibit C**. It also appears from the records of the South Carolina Court of Appeals that Appellant filed a Return to the Motion to Dismiss on August 12, 2019 that is attached hereto as **Exhibit D**. Appellant thereafter failed and refused to file her initial brief and designation of matter as required by the Order Allowing Late Filing. During this time period, Respondents’ Motion to Dismiss was pending. The Order dismissing the appeal was filed on December 5, 2019 and the present Motion to Reinstate Case was filed on December 20, 2019. A copy of the Order dismissing the appeal is attached hereto as **Exhibit E**.

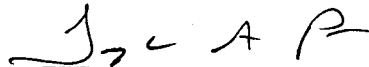
As set forth in Appellant’s other filings, she argues she doesn’t know the South Carolina Appellate Court Rules and she is waiting to be told how to proceed. However, this is not a proper ground to reinstate the appeal as Appellant is charged with knowledge of existing law and has a duty to protect her interest. See Labruce v. City of North Charleston, 268 S.C. 465, 234 SE 2d 866 (1977); Smothers v. U.S. Fidelity and Guaranty Co., 322 S.C. 207, 470 S.E. 2d 858 (Ct. App. 1996). Also, she is deemed to have knowledge of the rules governing the Court. See Merit Finance Company, Inc. of Kingsport v. Service Finance Company, Inc. of Greenwood, 38 F.R.D. 482 (D.S.C. 1965). Stated another way, it is not the function of the South Carolina Court of Appeals to instruct Appellant on how to comply with its rules. It is her responsibility to ensure that she follows the same. See Id. That being said, it appears that Appellant has some knowledge of the

South Carolina Appellate Court Rules as she has timely complied with some of them, corrected several procedural errors, and timely filed the Motion to Reinstate. See SCACR 260(a). As mentioned in Respondents' other filings, Appellant's argument concerning lack of knowledge and reliance on others strains credulity.

To the extent that the South Carolina Court of Appeals can provide guidance or assistance to Appellant, it has done so. In particular, Appellant was told in the Order Allowing Late Filing that she had until September 3, 2019 to file her initial brief and designation of matter. (See **Exhibit B**). She just failed and refused to file the same. This failure and refusal, without reasonable or credible justification, does not amount to the good cause required to reinstate her appeal. See Rule 260(a), SCACR. This especially true considering the above. It is merely an attempt to continue her appeal that she appears to have no interest in advancing.

For the foregoing reasons, the Motion to Reinstate should be denied.

Respectfully submitted,



M. Alan Peace (S.C. Bar No. 4384)

Taylor A. Peace (S.C. Bar No. 100206)

Harrell, Martin & Peace, P.A.

P.O. Box 1000

Chapin, South Carolina 29036

(803) 345-3353

*Attorneys for Respondents Eastpoint Properties,
LLC and Scollon Family Partnership, LLC*

December 30, 2019
Chapin, South Carolina

STATE OF SOUTH CAROLINA
In The Court Of Appeals

RECEIVED
DEC 30 2019
SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2018-001387

Patricia LutzAppellant

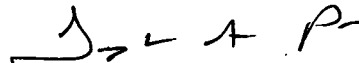
V

Eastpoint Properties, LLC and Scollon Family Partnership, LLC.....Respondents

PROOF OF SERVICE

I hereby certify that I have served a copy of **Respondent Eastpoint Properties, LLC and Respondent Scollon Family Partnership, LLC's Reply to Motion to Reinstate Above Case** in the above referenced matter on December 30, 2019, on the following, by causing a copy to be delivered via the U.S. Postal Service to Appellant to the addresses shown below:

Patricia Lutz
51 Bear Creek Road
Little Mountain, South Carolina 29075



M. Alan Peace (S.C. Bar No. 4384)
Taylor A. Peace (S.C. Bar No. 100206)
Harrell, Martin & Peace, P.A.
P.O. Box 1000
Chapin, South Carolina 29036
(803) 345-3353
*Attorneys for Respondents Eastpoint
Properties, LLC and Scollon Family
Partnership, LLC*

STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM LEXINGTON COUNTY
R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2018-001387

RECEIVED
JUL 31 2019
SC Court of Appeals

Patricia LutzAppellant

v.

Eastpoint Properties, LLC and Scollon Family Partnership, LLC.....Respondents

**RESPONDENTS EASPOINT PROPERTIES, LLC AND
SCOLLON FAMILY PARTNERSHIP, LLC'S
REPLY TO MOTION TO FILE LATE FILING AND MOTION TO DISMISS**

Respondents Eastpoint Properties, LLC and Scollon Family Partnership, LLC (collectively "Respondents") jointly reply to the Motion to File Late Filing ("Lutz Motion") filed by Appellant Patricia B. Lutz ("Appellant") on July 22, 2019 and submit that the above captioned appeal should be dismissed.

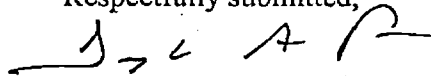
As identified in the Lutz Motion, Appellant states that she is proceeding *pro se* and bases the Motion on the grounds that she does not know how or when to file her Initial Brief and that she does not know the law. However, these are not proper grounds to allow a late filing considering she is charged with knowledge of existing law and has a duty to protect her interest. See Labruce v. City of North Charleston, 268 S.C. 465, 234 SE 2d 866 (1977); Smothers v. U.S. Fidelity and Guaranty Co., 322 S.C. 207, 470 S.E. 2d 858 (Ct. App. 1996).



Also, she is deemed to have knowledge of the rules governing this Court. See Merit Finance Company, Inc. of Kingsport v. Service Finance Company, Inc. of Greenwood, 38 F.R.D. 482 (D.S.C. 1965). To that end, Appellant has demonstrated some knowledge of the rules of this Court considering she: 1) timely filed a Notice of Appeal, 2) timely ordered the transcript of the applicable trial, 3) has had multiple correspondence with this Court attempting to correct procedural deficiencies, and 4), on at least one occasion, has represented to the Court that she would file her Initial Brief by a certain date. Copies of the documents related to the Notice of Appeal, order of the trial transcript, and Appellant's multiple correspondence with the Court are attached hereto as **Exhibit A**. It strains credulity for her to now claim that she doesn't know how or when to file her Initial Brief for herself.

Since Appellant claims that her lack of knowledge of the law and process are the reasons why she cannot file her Initial Brief within the time allowed under Rule 208(a)(1), SCACR in an appeal that she began over a year ago, the Court should dismiss the same under Rule 208 (a)(4), SCACR and Rule 260, SCACR.

Respectfully submitted,



M. Alan Peace (S.C. Bar No. 4384)

Taylor A. Peace (S.C. Bar No. 100206)

Harrell, Martin & Peace, P.A.

P.O. Box 1000

Chapin, South Carolina 29036

(803) 345-3353

*Attorneys for Respondents Eastpoint Properties,
LLC and Scollon Family Partnership, LLC*

July 31, 2019
Chapin, South Carolina

EXHIBIT A

87375

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

JUL 24 2018

R. Knox McMahon, Circuit Court Judge

SC Court of Appeals

Case No. 2013-CP-32-00871

Patricia L. Lutz.....Plaintiff/Appellant

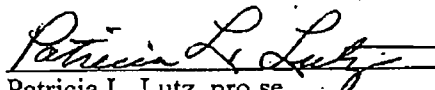
v.

Eastpoint Properties, LLC and Scollon Family Partnership, LLC.....Defendants/Respondents

NOTICE OF APPEAL

This is a mold exposure personal injury case. Appellant appeals from the Judgment on jury verdict entered in this case on June 27, 2018 Appellant received notice of the entry of the Judgment on announcement of the jury's verdict in open court on June 27, 2018. A copy of the Judgment appealed from is attached.

July 19, 2018



Patricia L. Lutz, pro se
51 Bear Creek Rd.
Little Mountain, SC 29075
803-391-2944

OTHER COUNSEL OF RECORD:

Taylor A. Peace
Hartell, Martin & Peace
135 Columbia Ave
Chapin, SC 29036
ATTORNEYS FOR RESPONDENTS

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

Case No. 2013-CP-32-00871

Patricia L. Lutz.....Plaintiff/Appellant

v.

Eastpoint Properties, LLC and Scollon Family Partnership, LLC.....Defendants/Respondents

PROOF OF SERVICE AND FILING

I certify that, on July 19, 2018, I served and filed the Notice of Appeal for this appeal by mailing copies of that filing to the following:

Taylor A. Peace
Harrell, Martin & Peace
135 Columbia Ave
Chapin, SC 29036

and

Office of the Lexington County Clerk of Court
205 E. Main Street
Lexington, SC 29072

RECEIVED
JUL 24 2018
SC Court of Appeals

SIGNATURE ON THE FOLLOWING PAGE

Patricia L. Lutz

Patricia L. Lutz, pro se
51 Bear Creek Rd.
Little Mountain, SC 29075
803-391-2944

Little Mountain, SC
July 19, 2018

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

IN THE COURT OF COMMON PLEAS
CIVIL ACTION NO.: 2013-CP-32-0871

Patricia Lutz,)
Plaintiff,)

VERDICT FORM

vs.)

Eastpoint Properties, LLC and Scollon)
Family Partnership, LLC,)

RECEIVED

Defendants.)
_____)

JUL 24 2018

SC Court of Appeals

SPECIAL INTERROGATORIES

NEGLIGENCE PERCENTAGES REQUIRED TO TOTAL 100%

1. Do you find that any of the named Defendants were negligent and that such negligence proximately caused the plaintiff's injuries?

_____ YES: If you answer yes, GO TO QUESTION 2
X NO: If you answer no, STOP AND DELIBERATE NO FURTHER

2. Do you find that the Plaintiff was negligent and that such negligence proximately caused his injuries?

_____ YES: If you answer yes, GO TO QUESTION 3
_____ NO: If you answer no, GO TO QUESTION 4

3. If your answer to question number 1 and question number 2 are YES, then answer this question:

Taking the combined negligence that proximately caused the Plaintiff's injuries as one hundred percent (100%), what percentage of that negligence is attributable to the plaintiff and what percentage is attributable to each of the defendants?

- a) The percentages must add up to 100%
- b) It is not required that each defendant be assigned a percentage of negligence. It is perfectly acceptable that a defendant be assigned a zero percentage.

Plaintiff	_____	%
Defendant East Point Properties, LLC	_____	%
Defendant Scollon Family Partnership, LLC	_____	%

If the Plaintiff's percentage of the combined negligence is greater than 50%, STOP AND DELIBERATE NO FURTHER.

If the Plaintiff's percentage of the combined negligence is 50% or less, GO TO QUESTION 4

4. Please state the total amount of damages, if any, sustained by the Plaintiff.
\$ _____

NOTE: If your question to number 2 was YES, do not reduce the Plaintiff's damages above by the percentage of negligence attributed to him in question number 3.

Laura K. Simpson 6/27/18
FOREPERSON

WHEN YOU HAVE COMPLETED THE QUESTIONNAIRE,
NOTIFY THE PLAINTIFF.

PATRICIA L. LUTZ
51 Bear Creek Road
Little Mountain, SC 29075

July 19, 2018

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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JUL 24 2018

SC Court of Appeals

Re: Patricia L. Lutz v. Eastpoint Properties, LLC and Scollon Family Partnership, LLC
2013-CP-32-00871

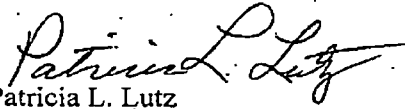
Dear Ms. Kitchings:

I am the pro se Plaintiff/Appellant in the appeal of the above case. I have enclosed, for filing in your office, a Notice of Appeal for this case and a filing fee check. Please return file stamped copies of the filings to me in the enclosed SASE.

By copy of this letter with the filings enclosed, I have filed these filings in the Lexington County Court of Common Pleas and have served these filings on Respondents' counsel Taylor A. Peace. Please call with any questions.

Thank you for your help

Sincerely,


Patricia L. Lutz

cc: Clerk, Lexington County Court of Common Pleas (w/enclosures).
Taylor A. Peace (w/enclosures).

PATRICIA L. LUTZ

51 Bear Creek Road
Little Mountain, SC 29075

July 19, 2018

Bethanie K. Creppon
PO Box 85411
Lexington, SC 29073

Re: Patricia L. Lutz v. Eastpoint Properties, LLC and Scollon Family Partnership, LLC
2013-CP-32-00871

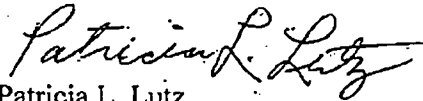
Dear Ms. Creppon:

I am the pro se Plaintiff in the above case. You reported the trial of this case that was tried from June 25, 2018 through June 27, 2018 in Lexington, SC before Circuit Judge R. Knox McMahon

I have filed a Notice of appeal of the final Judgment in this case, and I need a copy of the transcript of the above trial. Please prepare a transcript of the above trial.

Thank you for your help

Sincerely,



Patricia L. Lutz

cc: SC Court Administration
SC Court of Appeals, Clerk

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JUL 24 2018

SC Court of Appeals

FORM 11
LETTER ORDERING TRANSCRIPT FROM COURT REPORTER

October 4, 2018

RECEIVED

OCT 04 2018

SC Court of Appeals

Bethanie Creppon
Post Office Box 85411
Lexington, South Carolina 29073

RE: Patricia Lutz Appellate v Eastpoint Properties, LLC and Scollon Family Partnership, Case No. 2013-CP-32-0871 and also under 2013-CP-32-00817 and current the SC Supreme Court Appellate Case number is 2018-001387

Dear Bethanie:


On June 25-27, the above case was tried before the Honorable Knox McMahon Court of Common Pleas Judge, in Lexington County. My records indicate that you were the court reporter for this case.

I request that you provide me with a transcript of the proceedings. Please transcribe the entire record [except for the following parts:

- (1) Opening statements of counsel for appellant and respondent
- (2) Closing arguments of counsel for appellant and respondent

I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Sincerely,
Patricia Lynn Lutz
51 Bear Creek Rd
Little Mountain SC, 29075
(803) 391-2944



cc: Taylor Anthony Peace, Esquire
Allen Peace, Esquire
Lexington County Common Pleas Court
S.C. Court Administration
Clerk, Court of Appeals [Supreme Court]

I, Patricia Lutz, on October 4, 2018, am filing this form under the FOIA Act. I can also receive the transcript in electronic form, in a word document or I can pick it up at the Lexington county court house. I can be contacted at 803-391-2944.

Thank you very much,

Patricia Lutz

51 Bear Creek

Little Mountain, SC 29075

Transcript request

Page 1 of 1

Transcript request

Yandex Mail

October 12, 2018 9:23 AM

From: «Patricia Lynn Lutz» <lutzp@yandex.com>

To: bcreppon@sccourts.org

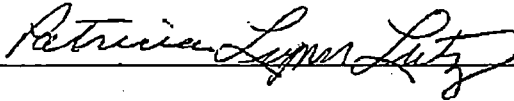
RE Case number 2013-CP-32-0871 Court of Peas and 2018-001387 SC Supreme Court Appellate Case
Certified mail with return receipt, 7099 3400 0009 3353 0650

Dear Ms. Creppon,

Please email me one copy of the transcript for the court case number 2013-CP-32-0871 and it is also under 2013-CP-32-00871. The dates of the hearing, 6-25-18 to 6-27-18. I have sent this by the above certified mail and enclosed was a US Postal money order for \$855.00 and the \$820 is for the transcript and for the \$35 is for the electronic copy to be sent to this email. If you need to reach me, I can be contacted by 803-391-2944

Thank you,

Patricia Lynn Lutz



• Scan 2.pdf

RECEIVED
OCT 12 2018
SC Court of Appeals

51 BEAR CREEK Rd.
LTI MTN SC 29075
12-14-2018

S.C. SUPREME COURT
COURT OF APPEALS
COLUMBIA SC
RE: CASE NUMBER 2018-001387

PATRICIA LUTZ

v
EAST POINT PROPERTIES AND
SCOLLON FAMILY PARTNERSHIPS

HAND DELIVERED

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DEC 14 2018

SC Court of Appeals

DEAR MADAM CLERK COURT OF APPEALS,
S.C. SUPREME COURT:

Today I received a copy of the transcript for the above
referenced case from Ms. Beth Ann Creppon.

PLEASE NOTIFY ME OF ANY DEVELOPMENTS WITH THE
CASE. I HAVE BEEN COMMUNICATING WITH MS. JESSICA LUCAS
AT THE S.C. SUPREME COURT OF APPEALS.

Respectfully Submitted,
Patricia Lutz



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

January 22, 2019

Patricia L. Lutz
51 Bear Creek Rd.
Little Mountain SC 29075

Re: Patricia Lutz v. Eastpoint Properties, LLC
Appellate Case No. 2018-001387

Dear Ms. Lutz:

Our records reflect that the time for serving and filing the appellant's initial brief and designation of matter has expired. Within ten (10) days of the date of this letter, you must serve and file the appellant's initial brief and designation of matter, along with a motion requesting permission to serve and file the appellant's initial brief and designation of matter outside of the filing deadlines set by Rules 208 and 209 of the SCACR. Your appellant's initial brief and designation of matter will not be considered if no motion is made. Failure to comply with the Court's request within ten (10) days of the date of this letter will result in the dismissal of this appeal.

Very truly yours,

V. Claire Allen, Deputy
CLERK

cc: Taylor Anthony Peace, Esquire
M. Alan Peace, Esquire

57 BEAR CREEK Rd.
LTI MTN SC 29075
01-31-2019

SC COURT of Appeals
1220 SENATE ST
COLUMBIA SC 29201

RECEIVED

JAN 31 2019

SC Court of Appeals

FAX: (803)-734-1839

CASE # 2018-001387

PATRICIA LOTZ V. EASTPOINT PROPERTIES, LLC; Scollon Family PARTNERSHIP

TO WHOM THIS MAY CONCERN:

I RECEIVED A LETTER FROM THE SC COURT OF APPEALS DATED 01-22-19
THAT I RECEIVED ON 01-24-2019.

I AM IN THE PROCESS OF RESPONDING TO THIS LETTER ASKING ME
(TELLING ME) I MUST FILE AND SERVE MY (APPELLANT'S) INITIAL BRIEF
WITHIN 10 DAYS WHICH WILL BE 02-04-2019.

I HAVE HEALTH ISSUES INCLUDING THROAT CANCER AND MUST
NEBULIZE WHENEVER NECESSARY. I HAVE P.T.S.D SECONDARY TO
BATTERED WIFE SYNDROME WHICH AT TIMES INTERFERES AT TIMES
WITH MY ABILITY TO FOCUS.

PLEASE HAVE PATIENCE WITH ME BECAUSE I AM PRO-SE.
MY PAPERWORK WILL NOT BE PROFESSIONAL, HOWEVER, I WILL
TELL THE TRUTH.

I AM ASKING THE COURT OF APPEALS PLEASE HAVE PATIENCE
AND LATITUDE WITH ME BECAUSE I AM PRO-SE.

I WILL SUBMIT MY BRIEF NO LATER THAN MONDAY, 02-04-2019

THANK YOU FOR YOUR PATIENCE.

IF YOU NEED TO CONTACT MY TELEPHONE NUMBER IS (803)-391-2944 OR
AT THE ABOVE RETURN ADDRESS.

Respectfully submitted,
Patricia Lotz Patricia Lotz

APPELLATE CASE #2018-001387
PATRICIA LUTZ
EASTPOINT PROPERTIES, LLC AND SLOWAN FAMILY PARTNERSHIP, LLC

51 BEAR CREEK RD
LTI MTN SC 29075
03-02-2019

THE SC. COURT OF APPEALS
1220 SENATE ST
COLUMBIA SC 29201
FAX 734-1839

ATTN: MS. JENNY ABBOTT KITCHINGS; CLERK OF COURT

DEAR MS. KITCHINGS;

I RECEIVED YOUR LETTER DATED MARCH 7, 2019 ON MARCH 11, 2019 IN
REFERENCE TO PROOF OF SERVICE REFERENCE YOUR LETTER DATED FEBRUARY 5, 2019
EVEN THOUGH I AM NOT AN ATTORNEY, I AM BEING FORCED TO REPRESENT MYSELF
PRO-SE FOR THIS CASE. I ADMIT I DO NOT KNOW THE FORMAT AND THIS IS
NOT MEANT TO BE DISRESPECTFUL TO THE COURT OR ANYONE AT ALL.
PLEASE NOTICE THE FOLLOWING PAGE. I HOPE THIS IS WHAT YOU ARE REQUESTING

Respectfully Submitted,
Patricia Lutz
PATRICIA LUTZ, APPELLANT

P.S. I HAVE BEEN TOLD YOU HAVE COPIES OF RECEIPTS SHOWING INFORMATION
WAS SUBMITTED TO YOU (SC. COURT OF APPEALS) AND THE HARRELL, MARTIN AND
PEACE, P.A. LAW GROUP OF CHAPIN SC THAT WERE DATED 02-04-2019 AND
02-08-2019.

RECEIVED
MAR 12 2019
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY
R. KNOX McMAHON, CIRCUIT COURT JUDGE

Appellate Case No. 2018-001387

PATRICIA LUTZ Appellant

v.

EASTPOINT PROPERTIES, LLC and Scotton Family Partnership, LLC... Respondents

PROOF OF SERVICE

I hereby certify that I have served a copy of RETURN TO MOTION TO DISMISS
Appellant, PATRICIA LUTZ, in the above referenced case originally
on February 4, 2019, on the following by causing a copy to be
delivered via the U.S. Postal Service to Counsel to the address
shown below:

HARRELL, MARTIN; PEACE, P. A.
135 Columbia Avenue
PO Box 1000
Chapin SC 29036

Resubmitted MARCH 12, 2019 AS PER THE INSTRUCTIONS OF
MS. JENNY ABBOTT KITCHINGS, CLERK OF SC SUPREME COURT OF APPEALS;
MS. KITCHINGS LETTER DATED MARCH 7, 2019; I RECEIVED ON MARCH 11,
2019.

RECEIVED

MAR 12 2019

SC Court of Appeals

51 BEAR CREEK Rd.
LTI MTN SC 29075
05-17-2019

MS. BETHANIE CREPPON
PO Box 85411
LEXINGTON SC 29072
RE: CASE # 2018-001387
S. C. COURT OF APPEALS
PATRICIA B. LUTZ, APPELLANT

v,
EASPOINT PROPERTIES, LLC AND SCOLLON FAMILY PARTNERSHIPS, LLC, RESPONDENTS

DEAR MS. CREPPON:

AS PER OUR PHONE CONVERSATION, 05-16-2019, I REQUESTED THE COMPLETE TRANSCRIPT FOR THE ABOVE REFERENCED CASE. THE HONORABLE JUDGE, H. BRUCE WILLIAMS, INFORMED ME THROUGH A LETTER DATED 05-13-2019; I RECEIVED IT ON 05-16-2019, THAT I HAD TO REQUEST THE ENTIRE TRANSCRIPT IN ITS ENTIRETY AND ORDER IT WITHIN 10 DAYS OF MAY 13, 2019 WHICH I RECEIVED ON 05-16-2019. I AM COMPLYING WITH THIS ORDER.

MS. CREPPON PLEASE LOCATE THE ENCLOSED US POSTAL MONEY ORDER DATED 05-17-2019 IN THE AMOUNT OF \$21,000.

Sincerely,
Patricia B. Lutz

CC: S.C. COURT OF APPEALS
S.C. COURT OF APPEALS ADMINISTRATION
LAW OFFICES OF HARRELL, MARTIN, AND PEACE, P.A.

RECEIVED

MAY 17 2019

SC Court of Appeals



POSTAL MONEY ORDER

Serial Number

25025245007

2019-05-17 291770 U.S. Dollars and Cents

\$21.00

Twenty One Dollars and 00/100

Pay to Ms. BETHANIE C. [unclear]

Clerk 01

Address PO Box 8541
LEXINGTON SC 29052

From PATRICK LUTZ
Address PO BOX 8541
LEXINGTON SC 29052

Memo TRANSCRIPT SECRET
2018-001387

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SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS

⑆00000800⑆

25025245007

RECEIVED

MAY 17 2019

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY
R. KNOX MCMAHON, CIRCUIT COURT JUDGE

APPELLATE CASE No. 2018-001387

PATRICIA LUTZ Appellant
V.
EASTPOINT PROPERTIES, LLC AND SCOTTON FAMILY PARTNERSHIPS, LLC... Respondents

PROOF OF SERVICE

I hereby CERTIFY THAT I HAVE SERVED a COPY of the ORDER signed by the Honorable Judge H. BRUCE WILLIAMS, for the COURT, ORDERING ME, THE Appellant, PATRICIA LUTZ, TO provide proof of ENTIRE TRANSCRIPT FOR THE above REFERENCED CASE.

I HAVE ORDERED THE ENTIRE TRANSCRIPT, IN ITS ENTIRETY, FROM MS. BETHANIE CREPPON ON 05-17-2019 through US POSTAL MONEY ORDER.

This PROOF OF SERVICE is MAILED through THE U.S. POSTAL SERVICE TO THE LAW OFFICES OF HARRELL, MARTIN, AND PEACE, P.A.; PO Box 1000; Chapin SC 29036.

PATRICIA B. LUTZ, Appellant

Patricia B. Lutz
51 BEAR CREEK RD.
LTI MTN SC 29075

(803)-345-3201 OR

(803)-391-2944, PRIMARY PHONE NUMBER

CC:
SC SUPREME COURT OF APPEALS
SC COURT OF APPEALS COURT ADMINISTRATION, THE HONORABLE JENNY ABBOTT KITCHINGS
MS. BETHANIE CREPPON, COURT REPORTER

RECEIVED

MAY 17 2019

SC Court of Appeals

51 BEAR CREEK Rd.
LTI MTN SC 29095
05-17-2019

S.C. COURT OF APPEALS
ADMINISTRATION
1220 SENATE ST
SUITE 200
COLUMBIA SC 29201
RE: CASE # 2018-001387
PATRICIA LUTZ
v.

2 ASTORIA PROPERTIES, LLC AND Scollon FAMILY PARTNERSHIPS, LLC, RESPONDENTS

TO WHOM THIS MAY CONCERN:

THIS LETTER IS TO CONFIRM THAT I HAVE ORDERED IN ITS ENTIRETY THE TRANSCRIPT OF CASE # 2018-001387 IN ITS ENTIRETY FROM MS BETHANIE CREPPON, COURT REPORTER FOR THE ABOVE REFERENCED CASE, FOR THE AMOUNT OF \$21,000 ON 05-17-2019; THIS IS A US POSTAL MONEY ORDER.

I RECEIVED A LETTER FROM THE HONORABLE JUDGE H. BRUCE WILLIAMS, DATED 05-13-2019 ON 05-16-2019, INFORMING ME I HAD TO HAVE THE ENTIRE COPY OF THIS TRANSCRIPT. I HAVE COMPLIED.

Respectfully Submitted,
Patricia B. Lutz
PATRICIA B. LUTZ

CC:

S.C. COURT OF APPEALS
MS. BETHANIE CREPPON
LAW OFFICES OF HARRELL, MARTIN, AND PEACE, P.A.

RECEIVED

MAY 17 2019

SC Court of Appeals

31 BEAR CREEK RD.
LITTLE MTN SC 29075
06-03-2019

S.C. COURT OF APPEALS
1220 SUMNER ST.

COLUMBIA SC 29201

RE: CASE # 2018-001387

PATRICIA LUTZ, Appellant
v.

EASTPOINT PROPERTIES, LLC AND Scallon Family Partnerships LLC,
RESPONDENTS

TO WHOM THIS MAY CONCERN:

THIS LETTER CONFIRMS, I, PATRICIA B. LUTZ, Appellant, HAVE RECEIVED
IN ITS ENTIRETY THE COURT TRANSCRIPT PERTAINING TO THIS CASE ON
06-03-2019.

THIS TRANSCRIPT WAS ORDERED ON 05-17-2019 FROM MS. BETHANIE CREPPON
COURT REPORTER,

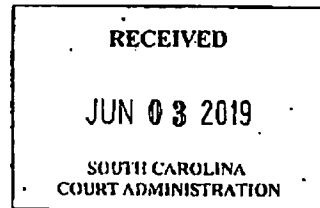
Respectfully Submitted,
Patricia B. Lutz
PATRICIA B. LUTZ

RECEIVED
JUN 03 2019
SC Court of Appeals

cc: S.C. COURT OF APPEALS ADMINISTRATION

MS. BETHANIE CREPPON

LAW OFFICES OF HARRELL, MARTIN, AND PEACE, P.A.



STATE OF South CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY
R. KNOX McMAHON, CIRCUIT COURT JUDGE

Appellate CASE No. 2018-001387

PATRICIA LUTZ..... Appellant
v.
EASTPOINT PROPERTIES, LLC AND Scollon FAMILY PARTNERSHIPS, LLC... Respondents

PROOF OF SERVICE

I hereby CERTIFY THAT I, PATRICIA B. LUTZ, Appellant, HAVE SERVED THIS LETTER THAT I HAVE RECEIVED IN ITS ENTIRETY THE COURT TRANSCRIPT PERTAINING TO THIS CASE ON 06-03-2019 TO THE LAW OFFICES OF HARRELL, MARTIN AND PEACE, PA,

THIS PROOF OF SERVICE IS MAILED THROUGH THE U.S. POSTAL SERVICE TO THE LAW OFFICES OF HARRELL, MARTIN, AND PEACE, PA; PO Box 1000, Chapin SC 29031

PATRICIA B. LUTZ, Appellant

Patricia B. Lutz
51 BEAR CREEK RD
LTI MTN SC 29075

(803)-391-2944 (phone does NOT TEXT, NOR RECEIVES MESSAGES)

C.C.

S.C. SUPREME COURT OF APPEALS

S.C. COURT OF APPEALS COURT ADMINISTRATOR

MS. BETHANIE CREPPON, COURT REPORTER

RECEIVED

JUN 03 2019

SC Court of Appeals

RECEIVED
JUN 03 2019
SOUTH CAROLINA
COURT ADMINISTRATION

STATE OF SOUTH CAROLINA
In The Court Of Appeals

RECEIVED
JUL 31 2019
SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2018-001387

Patricia LutzAppellant

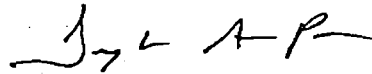
V

Eastpoint Properties, LLC and Scollon Family Partnership, LLC.....Respondents

PROOF OF SERVICE

I hereby certify that I have served a copy of **Respondent Eastpoint Properties, LLC and Respondent Scollon Family Partnership, LLC's Motion to Dismiss** in the above referenced case on July 31, 2019, on the following by causing a copy to be delivered via the U.S. Postal Service to Counsel to the addresses shown below:

Patricia Lutz
51 Bear Creek Road
Little Mountain, South Carolina 29075



M. Alan Peace (S.C. Bar No. 4384)
Taylor A. Peace (S.C. Bar No. 100206)
Harrell, Martin & Peace, P.A.
P.O. Box 1000
Chapin, South Carolina 29036
(803) 345-3353
*Attorneys for Respondents Eastpoint
Properties, LLC and Scollon Family
Partnership, LLC*



HARRELL, MARTIN
& PEACE, P.A.
ATTORNEYS AT LAW

L.K. "Trey" Harrell, III
Jeremy C. Martin
M. Alan Peace **
Taylor A. Peace
Andrea "Andi" Cornelison

Robert W. Dibble, Jr. *
William Jennings (Bill) Buchanan *
Donald W. Tyler *
Thomas B. Jackson, III *

*Of Counsel
**Certified Mediator/Arbitrator

July 31, 2019

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
JUL 31 2019
SC Court of Appeals

Re: **Patricia Lutz v. Eastpoint Properties, LLC and Scollon Family Partnership, LLC**
Appellate Case No.: 2018-001387
Case No. 2013-CP-32-0871
Our File No.: 3347.28229/MAP

Dear Ms. Kitchings:

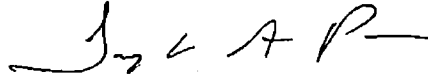
Our law firm represents the Respondents Eastpoint Properties, LLC and Scollon Family Partnership, LLC, in the above referenced matter. Enclosed please find an original and seven (7) copies of Respondent Eastpoint Properties, LLC and Scollon Family Partnership, LLC's Reply to Motion to File Late Filing and Motion to Dismiss. Also enclosed is our firm's check in the amount of \$50.00 for the filing fee. Please file the original and copies and return a clocked copy to me in the self-addressed envelope provided.

By copy of this letter, I am serving Appellant Patricia Lutz with the same.

Thank you for your assistance with this matter.

Sincerely,

HARRELL, MARTIN & PEACE, P.A.

A handwritten signature in black ink, appearing to read "T. A. Peace", with a long horizontal flourish extending to the right.

Taylor A. Peace, Esquire

TAP/tsm
Enclosures

cc: Patricia Lutz

*

The South Carolina Court of Appeals

Patricia Lutz, Appellant,

v.

Eastpoint Properties, LLC and Scollon Family
Partnership, LLC, Respondents.

Appellate Case No. 2018-001387

The Honorable R. Knox McMahon
Lexington County
Trial Court Case No. 2013CP3200871

ORDER

Appellant has filed a motion to allow the late filing of the appellant's initial brief and designation of matter. This motion is Granted. The appellant's initial brief and designation of matter is due to be served and filed no later than September 3, 2019.

FOR THE COURT

BY V. Claire Allen, Deputy
CLERK

Columbia, South Carolina

FILED

August 1, 2019 S.S.

cc:

Patricia L. Lutz

Taylor Anthony Peace, Esquire

M. Alan Peace, Esquire





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

August 01, 2019

Patricia L. Lutz
51 Bear Creek Rd.
Little Mountain SC 29075

Re: Patricia Lutz v. Eastpoint Properties, LLC
Appellate Case No. 2018-001387

Dear Ms. Lutz:

Upon further review, this Court recognizes that the motion received on July 22, 2019 contained the required filing fee. Please disregard this Court's deficiency letter dated July 29, 2019. Enclosed is a copy of this Court's decision.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Taylor Anthony Peace, Esquire
M. Alan Peace, Esquire

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable Judge ^{KNOX} R. McMahon

~~George F. Brown~~, Circuit Court Judge

Case No. 2018-001387

SASPOINT PROPERTIES
Sedon Family PARTNERSHIPS

Respondent,

v.

PATRICIA B. LUTZ

Appellant.

RECEIVED

JUL 22 2019

SC Court of Appeals
90361

MOTION TO FILE LATE FILING

I do NOT HAVE legal REPRESENTATION Against my will, I do NOT KNOW when OR how TO REPRESENT MYSELF NOR when OR how TO OVERALL file FOR MYSELF
I NEED TO FILE THIS MOTION AS MOTION TO FILE LATE BECAUSE I do NOT KNOW THE LAW.

Date 07-22-2019

s/

Patricia B. Lutz



FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable Judge R. KNOX McMATTON
~~George E. Brown~~, Circuit Court Judge

RECEIVED

Case No. 2018-001307

JUL 22 2019

SC Court of Appeals

EASTPOINT PROPERTIES
SCOLLON FAMILY PARTNERSHIPS

Respondent,

v.

PATRICIA B. LUTZ

Appellant.

PROOF OF SERVICE

I certify that I have served the Motion TO FILE LATE FILING on 07-22-2019 by depositing a copy of it in the United States Mail, postage prepaid, on 07-22-2019, addressed to his attorney of record, HARRELL, MARTIN, PEACE LAW GROUP.

PO Box 1000 Chopin SC 29036

Date 07-22-2019

sl

Patricia B. Lutz

51 BEAR CREEK RD.
LITTLE MTN SC 29075
08-10-2019

S.C. COURT OF APPEALS
1220 SENATE STREET
COLUMBIA SC 29201

PATRICIA LUTZ, Appellant
v

RECEIVED

Swallon Family PARTNERSHIPS, LLC, Respondent
EAST POINT PROPERTIES, LLC Respondent
AUG 12 2019
SC Court of Appeals
Appellant CASE No. 2018-001387

TO Whom This MAY CONCERN:

AS ALL ARE AWARE, I AM PRO-SE AND I AM STILL TRYING TO FIND ATTORNEY REPRESENTATION TO REPRESENT ME IN THIS CASE. SINCE I DO NOT HAVE J.D. DEGREE, I AM NOT AN OFFICER OF THE COURT, AND I CAN ONLY SPEAK AS AN UNTRAINED PERSON WHICH I FREELY STATE REPEATEDLY THAT MANY ATTORNEYS WILL NOT TAKE THIS CASE BECAUSE IT HAS BEEN badly MISHANDLED BY THE FIRST ATTORNEY, MR. CHARNEK PEAKE OF PEAKE AND FOWLER. I AM ALMOST ALWAYS TOLD ALMOST VERBATIM: "MR. PEAKE did some things he should NOT have done AND did NOT do some things he should have ~~NOT~~ done." SOME ATTORNEYS HAVE INFORMED ME THEY DO NOT WANT TO "REPORT" ANOTHER ATTORNEY. MOST THE ATTORNEYS WHOM HAVE HANDLED THIS CASE APPEAR TO HAVE BEEN PERSUADED THROUGH VARIOUS MEANS NOT TO PROPERLY HANDLE (REPRESENT) THIS CASE.

I AM AN APPELLANT, WHOM FROM THE BEGINNING HAS NOT TRIED TO COVER ANYTHING FOR ANY REASON. SOME STATEMENTS HAVE BEEN PAINFUL AND PRIVATE TO DISCUSS, YET WHATEVER PERTAINS TO THIS CASE, I WILL DISCUSS / DISCLOSE.

I REFUSE TO BE A COWARD FOR ANY REASON AND I REFUSE



APPELLANT CASE # 2018-001387

08/10/2019

TO TRY TO HIDE TRUTH OR HAVE ANYBODY'S TRUTH HIDDEN,
I FILED FOR LATE FILING ON TIME WITH THE \$50.00 CASH ON
JULY 22, 2019. THIS WAS WITHIN THE TIME FRAME FOR FILING.

I RECEIVED A PACKET THROUGH THE US MAIL FROM THE
HARRELL, MARTIN, PEACE (HMP) LAW GROUP REPRESENTING
EASTPOINT PROPERTIES, LLC/SCOTLOW FAMILY PARTNERSHIP, LLC
DATED 07-31-2019 AND MAILED THE SAME DAY WHICH I DID NOT
RECEIVE UNTIL MONDAY, AUGUST 5, 2019.

IMMEDIATELY I CALLED THE SC COURT OF APPEALS ON 08-05-2019
AND SPOKE WITH MY CASE HANDLER, CATHY. SHE EXPLAINED TO
ME THAT NEITHER THE APPELLANT, NOR THE RESPONDENTS RECEIVED
NOTIFICATION BY MAIL THAT I FILED ON TIME 07-22-2019 DUE
TO A "CLERICAL ERROR."

SINCE I FILED ON TIME AND THERE WAS A "CLERICAL ERROR," I
DO NOT BELIEVE I NEED TO RESPOND TO MR. M. ALAN PEACE OR
HIS SON, MR. TAYLOR A. PEACE OF THE HMP LAW GROUP, HOWEVER, I
REQUEST TO RESERVE TO RESPOND IN THE FUTURE TO THE 07-31-2019
LETTER (MOTION) OF HMP LAW GROUP. I WILL REPRESENT MYSELF UNTIL I
FIND AN ATTORNEY TO REPRESENT ME. THIS IS MY CURRENT RESPONSE.

AS ALL ARE AWARE, I AM DISABLED AND I HAVE P.T.S.D, SECONDARY
TO BATTERED WIFE SYNDROME. MY PHYSICAL HEALTH IS GETTING
WORSE BECAUSE OF WHAT MY LUNGS, THROAT EXPERIENCED IN THE
DUPLEX APARTMENTS OWNED BY THE RESPONDENTS. MY MEDICAL
RECORDS WILL PROVE THE TIMETABLE AND THE RESPONDENT'S
MAINTENANCE OF THESE APARTMENTS WHERE I LIVED IS NOT
COINCIDENTAL.

08/10-2019

CASE No. 2018-001387

IF THE HARRELL, MARTIN, PEACE LAW GROUP did NOT APPEAR TO BE TRYING TO PREVENT THE PUBLIC (OR ANYONE ELSE) FROM BEING AWARE OF THE RESPONDENT'S MAINTAINENCE OF THESE APARTMENTS, WHY ARE THEY TRYING TO SHUT-UP MY CASE?

REMEMBER THE DECADES TENANTS INFORMED THE PROPERTY MANAGEMENT (PERHAPS OWNERS) AT THE ALLEN BENEDICT COURT APARTMENTS IN COLUMBIA SC OF THE FACTS THEIR APARTMENTS WERE NOT BEING PROPERLY MAINTAINED AND NOTHING MUCH APPEARED TO HAVE BEEN DONE UNTIL TWO MEN IN J APARTMENT DIED. THE MANAGEMENT STILL APPEARED TO HAVE TRIED TO LIE THEIR WAY THROUGH THE SITUATION.

HMP HAVE TRIED REPEATEDLY TO TOTALLY SUPPRESS ANY INFORMATION TO MY CASE FROM INCLUDING EXPERT TESTIMONY OF ANY SOURCE, INCLUDING MEDICAL, MOIST FROM BEING DISCLOSED TO ANY SOURCE TRYING TO REPRESENT MY CASE. I HAVE WHAT IT TAKES TO GO FORWARD WITH MY CASE AND EVEN THE TRANSCRIPT PROVES THE HEARING IN JUNE 2018 APPEARS TO HAVE PROVEN FRAUDULENCE AND CARTE-BLANCHE FOR THE NOW RESPONDENT TO WALK OUT THE DOOR BY NOT ALLOWING THE JURY TO KNOW THE TRUTH. HOW CAN SOMEONE MAKE A PROPER, TRUE DECISION WITHOUT KNOWING THE AUTHENTIC TRUTH?

08-10-2019

Appellant Case # 2018-001387

I AM NOT A COWARD; I FEEL IT LIKE IT IS... FACT,
NO MATTER HOW PAINFUL. I AM DEFINATELY NOT A DELIBERATE
LIAR AND NO MATTER WHAT THE OUTCOME, I REFUSE TO COVER
FOR LIARS. COVERING/SUPPRESSING IS A LIE AND IS DECEPTIVE.

SOME ATTORNEYS APPEAR TO THINK BECAUSE THEY HAVE
J.D. DEGREE THIS GIVES THEM THE AUTHORITY TO PLAY
GOD WITH PEOPLE'S LIVES. WHAT IS THE PURPOSE OF
HIRING AN ATTORNEY WHEN ^{SOME} ATTORNEYS APPEAR TO ACT
LIKE LAY PEOPLE SHOULD REPRESENT THEMSELVES LIKE
A DEGREEED ATTORNEY?

THINK OF THE THOUSANDS THAT HAVE BEEN SPENT BECAUSE
SOME PEOPLE SIMPLY APPEAR NOT TO DO RIGHT, UNLESS THEY
ARE FORCED TO DO RIGHT.

Respectfully Submitted

Patricia Lutz

cc: HARRELL, MARTIN, PEACE LAW GROUP

PAGE 5 of 5
08-12-2019

FORM 7

PROOF OF SERVICE OF A NOTICE OF Appeal

THE STATE OF South CAROLINA
IN THE COURT OF APPEALS

Appeal FROM LEXINGTON COUNTY
COURT OF COMMON PLEAS

The Honorable Judge R. Knox Mc Mahon, CIRCUIT COURT Judge

CASE No. 2018-001307

RECEIVED

PATRICIA R. LUTZ

Appellant

AUG 12 2019

SC Court of Appeals

v

EASTPOINT PROPERTIES

SULLIVAN FAMILY PARTNERSHIPS, Respondents

PROOF OF SERVICE

I CERTIFY THAT I HAVE SERVED THE RESPONSE ON
08-12-2019 by depositing A COPY of IT IN THE
UNITED STATES MAIL, postage prepaid on 08-12-2019,
Addressed TO HIS ATTORNEY OF RECORD, HARRELL, MARTIN,
PEACE LAW GROUP, PO BOX 1000. Chapin SC 29036.

DATE 08-12-2019

The South Carolina Court of Appeals

Patricia Lutz, Appellant,

v.

Eastpoint Properties, LLC and Scollon Family
Partnership, LLC, Respondents.

Appellate Case No. 2018-001387

ORDER

This court gave Appellant an extension of time until September 3, 2019, to serve and file Appellant's initial brief and designation of matter. As of the date of this order, Appellant has not served and filed the brief and designation. Accordingly, this appeal is dismissed. The remittitur will be sent as required by Rule 221(b), SCACR.



FOR THE COURT

Columbia, South Carolina

cc:

Patricia L. Lutz

Taylor Anthony Peace, Esquire

M. Alan Peace, Esquire

FILED

December 5, 2019



HMP HARRELL, MARTIN
& PEACE, P.A.
ATTORNEYS AT LAW

L.K. "Trey" Harrell, III
Jeremy C. Martin
M. Alan Peace **
Taylor A. Peace
Andrea "Andi" Cornelison

Robert W. Dibble, Jr. *
William Jennings (Bill) Buchanan *
Donald W. Tyler *
Thomas B. Jackson, III *

*Of Counsel
**Certified Mediator/Arbitrator

December 30, 2019

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
DEC 30 2019
SC Court of Appeals

Re: **Patricia Lutz v. Eastpoint Properties, LLC and Scollon Family Partnership, LLC**
Appellate Case No.: 2018-001387
Case No. 2013-CP-32-0871
Our File No.: 3347.28229/MAP

Dear Ms. Kitchings:

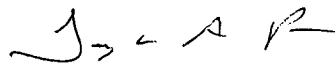
Our law firm represents the Respondents Eastpoint Properties, LLC and Scollon Family Partnership, LLC, in the above referenced matter. Enclosed please find an original and seven (7) copies of Respondent Eastpoint Properties, LLC and Respondent Scollon Family Partnership, LLC's Reply to Motion to Reinstate Above Case. Please file the original and copies and return a clocked copy to me in the self-addressed envelope provided.

By copy of this letter, I am serving Appellant Patricia Lutz with the same.

Thank you for your assistance with this matter.

Sincerely,

HARRELL, MARTIN & PEACE, P.A.



Taylor A. Peace, Esquire

TAP/tsm
Enclosures

cc: Patricia Lutz