

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas
Douglas M. Zayicek, Special Referee

Appellate Case No. 2019-001630

Larry W. Richardson, Appellant,

v.

Ashford Subdivision Homeowners'
Association, Inc., Respondent.

RECEIVED

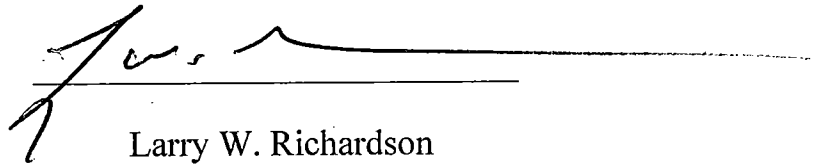
JAN 30 2020

SC Court of Appeals

PROOF OF SERVICE

I certify that I have hand delivered the six pages the Respondent ask for in their letter of January 21, 2020 (copy attached). I have also mailed a copy of my response to their letter to the SCCOA. Both of these actions were taken on January 24, 2020. The documents the Respondent ask for were in reference to my **MEMORANDA CONTRA TO MEMORANDUM OF LAW IN SUPPORT OF RESPONDENT'S MOTION TO DISMISS.**

January 24, 2020



Larry W. Richardson

303 Tapscott St.
Myrtle Beach, SC 29579
(843) 957-8180
Appellant

Other Counsel of Record:

Angela D. Harrison

Post Office Box 14737

Surfside Beach, South Carolina 29587-4737

Attorney for Respondent

(843) 650-9757

FROM: Larry W. Richardson
303 Tapscott St
Myrtle Beach, SC 29579
843-957-8180

January 23, 2020

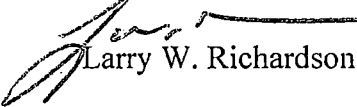
TO: Moore, Johnson & Saraniti Law Firm, P>A>
1271 Glens Bay Road
Surfside Beach, SC 29579

RE: Richardson Appeal SCCOA Case # 2019-01630

Dear Ms. Harrison,

My sincerest apologies for those pages being missing. Here is a copy of all pages (1-6) of the Memoranda Contra to Memorandum of Law in Support of Respondent's Motion to Dismiss with Exhibits. I trust all 39 exhibits mentioned in the Memoranda Contra were present in the package I dropped off at your office on January 17, 2020, not the 20th, see copy of 'receipt' signed by your office (Attachment 1).

Yours,


Larry W. Richardson

cc: Clerk of the South Carolina Court of Appeals

Received pages 1-6 of Memoranda Contra . . .
on 1/24/20 Debbie Gray
date signed



MOORE, JOHNSON & SARANITI Law Firm, P.A.

Virginia Lee Moore
Certified Family Court Mediator
Sarah A. Johnson
Also member of North Carolina Bar
Elizabeth J. Saraniti
Also member of Ohio Bar
Angela D. Harrison
Nancy M. Zovnic

Physical Address:
(overnight deliveries only)
1271 Glenns Bay Road
Surfside Beach, SC 29575
Mailing Address:
P.O. Box 14737
Surfside Beach, SC 29587-4737
Phone: 843-650-9757
Fax: 843-650-9747

January 21, 2020

Larry Richardson
303 Tapscott St.
Myrtle Beach, SC 29579

Re: Richardson Appeal
File No.: P279AH

RECEIVED
JAN 30 2020
SC Court of Appeals

Dear Mr. Richardson:

On January 17, 2020 you delivered to our office a copy of your Memoranda Contra to Memorandum of Law in Support of Respondent's Motion to Dismiss with Exhibits. The copy you provided is incomplete and is missing pages 2-5. Please provide a complete copy of the Memoranda. With kind regards, I remain

Sincerely,


Angela D. Harrison

ADH/ch
Enclosures as stated.

cc: Jenny Abbott Kitchings, Clerk of the South Carolina Court of Appeals

*Rec'd
JAN 23, 2020*

FROM: Larry W. Richardson
303 Tapscott St
Myrtle Beach, SC 29579
843-957-8180

January 23, 2020


TO: Moore, Johnson & Saraniti Law Firm, P>A>
1271 Glens Bay Road
Surfside Beach, SC 29579

RE: Richardson Appeal SCCOA Case # 2019-01630

Dear Ms. Harrison,

My sincerest apologies for those pages being missing. Here is a copy of all pages (1-6) of the Memoranda Contra to Memorandum of Law in Support of Respondent's Motion to Dismiss with Exhibits. I trust all 39 exhibits mentioned in the Memoranda Contra were present in the package I dropped off at your office on January 17, 2020, not the 20th, see copy of 'receipt' signed by your office (Attachment 1).

Yours,


Larry W. Richardson

cc: Clerk of the South Carolina Court of Appeals

Acknowledgment of receipt of
proof of service and memoranda
contra to memorandum of law in support
of Respondent's Motion to Dismiss in
the SCCOH case Number 2019-06302

~~Debbie Wang~~
Signed

~~1/11/21~~
date

LARRY W. RICHARDSON
303 Tap Scott St.
Myrtle Beach, SC 29579

RTS-1A

COLUMBIA SC 290

24 2019 2:22 PM 54



SCCOA

Appellate Case # 2019-00163

Columbia, SC

RECEIVED

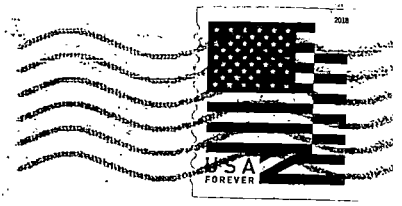
JAN 30 2020

SC Court of Appeals

LARRY W. RICHARDSON
302 TAPSCOTT ST.
MYRTLE BEACH, SC 29579

COLUMBIA SC 290

28 JAN 2020 PM 2 L



RECEIVED
JAN 30 2020
SC Court of Appeals

Jenny Abbott Kitchings
SC COA
P.O. Box 11629
Columbia, SC 20211

29211-162929

