

STATE OF SOUTH CAROLINA COURT OF APPEALS
FOR THE FOURTH CIRCUIT

APPEAL FROM LEXINGTON COUNTY

Common Pleas Court

Alison Renee Lee, Presiding Judge

Case No. 2016-CP-32-01385

Appellants Case No. 2018-002157

Richie D. Barnes,

Respondent,

v.

Notice of Objections

James Reese,

Appellant.

Notice of Objections is hereby given that I, James Reese in the above named case, hereby give this notice to the South Carolina Court of Appeals 4th Circuit entered in this action on the 20th day of

May, 2020

(s)

James Reese

Address:

717 Cindy Dr.
Columbia, SC 29203

RECEIVED
MAY 26 2020
SC Court of Appeals

I, appellant, James Reese now enters upon the record these following objections to respondent, ("Barnes") reply brief.

A. I object, to "Barnes" argument **"A. REESE DID NOT MAKE A POST TRIAL-MOTION, AND THEREFORE HIS ARGUMENTS ARE NOT PRESENTED FOR APPELLATE REVIEW"**, on the grounds that I, James Reese, was instructed by the lower court to deliver in its possession within ten (10) days a motion into the court and after such instructions provided by the lower court, and filing of such request with no response by the court or "Barnes" attorney-at-law, I, James Reese, delivered into the custody of the lower court a "Notice of Appeal" which thereafter had been delivered by way of United States Post Office to "Barnes" attorney-at-law. I, James Reese, was not properly availed or given any further instructions regarding any latent defects or errors made regarding my expressed efforts to preserve all interest, rights, and defences pertaining to this matter.

B. I, object to the respondent's attorney-at-law, Name, for Barnes, argument **"C. RESPONSES TO REESE'S ARGUMENTS"** who claims that I am in error for using "oral argument" not using "authority" to ~~support my brief as a matter of substantial rule and procedure.~~

First, I give mandatory notice supported by these court rules to all parties in this superior court to enter upon record that I, James Reese, have never consented to waive my guaranteed special constitutionally protected rights ("Bill of Rights") (See evidence Constitution GPO "A") and have elected in my aid the fundamental

equitable principles of justice in this matter per Haines v. Kerner,
404 U.S. 519, wherein the court has directed that those who are
unschooled in law making pleadings and/or complaints shall have the
court look to the substance of the pleadings rather in than the form,
and hereby makes the following pleadings/notices in the above
referenced matter without waiver of any other equitable
("substantial") defenses or offenses. The court has directed those
who are unschooled in law making pleadings shall have the court look
to the substance of the pleadings rather than the form. Pro se
pleadings are to be considered without regard to technicality; pro se
litigants' pleadings are not to be held to the same high standards of
perfection as lawyers. Maty v. Grasselli Chemical Co., 303 U.S. 197
(1938).

Due to my, James Reese, legal disability to the rules of at law
which I, James Reese, require the natural rules of equity to aid in
doing justice on the consideration that there is a conflict between
the rules of at law and my inherited substantial rights held in
equity, which is does justice by wholes and not by halves.

Furthermore, "Barnes" attorney, has yet to answer the initial
brief enter into the court and such failure to give response is a
serious waste of this superior court's time. Also take mandatory
notice that, "Barnes" attorney, Jordan, has stated within his closing
arguments for the record on the given transcripts enter as evidence,

"that a sixth grader" can see that this is not my, James Reese, signature in conjunction with the Certified Forensic Analysis handwriting expert who also testified under oath that this was not my, "James Reese's signature, on the now proven fraudulent lease. It is a well known principle of justice that equity delights in equality and does not allow a wrong to suffer without a remedy."

Drafted by:



James Reese, pro se,
In care of 717 Cindy Drive
Columbia South Carolina 29203

CC: JORDAN LAW FIRM

Attention: Jordan, Attorney-at-Law
on behalf of Richie Barnes

In care of _____
Columbia South Carolina

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Appellants Case No. 2018-002157

Richie D. Barnes,

Respondent,

v.

PROOF SERVICE

James Reese,

Appellant.

This proof of service is to Leonard Jordan Jr. Attorney-at-Law,
at the JORDAN LAW FIRM of James Reese Notice of Objection I, James
~~Reese in the above named case, hereby give this notice by way of~~
United States Postal delivered to 211 Veterans Road, Columbia South
Carolina 29209, on this 20 day of May, 20 20

(s) James Reese

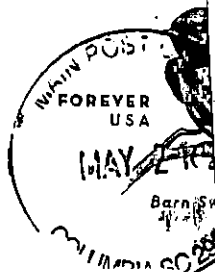
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MAY 26 2020
SC Court of Appeals

James Reese
717 Cindy Drive
Columbia, S.C. 29203

CERTIFIED MAIL



7019 2970 0000 9505 6082



ATTN:
S.C. Court of Appeals
1220 Senate Street
Columbia, S.C. 29201

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SC Court of Appeals



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