

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Case No. 2018-CP-07-1559

**RECEIVED**  
**Jun 08 2020**  
**SC Court of Appeals**

Charles E. Houston, Jr.....Appellant,

v.

Dean B. Bell, individually;  
Law Offices of Dean B. Bell, LLC; and  
B. Hammel Properties, LLC.....Respondents.

**RESPONDENT B. HAMMEL PROPERTIES, LLC'S  
MOTION TO AMEND INTIAL BRIEF**

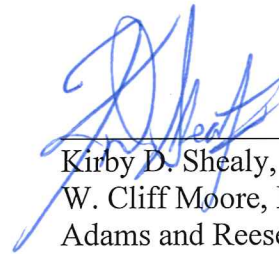
The Respondent B. Hammel Properties, LLC (the “Respondent”), moves for an Order allowing it to amend its Initial Brief by adding the actual statement of the Statement of the Case and the Standard of Review, instead of incorporating by reference the Statement of the Case and the Standard of Review set out in the Initial Brief of the Respondents Dean B. Bell and The Law Offices of Dean B. Bell, LLC.

**FACTS, PROCEDURAL BACKGROUND AND ARGUMENT**

The Initial Brief of the Respondent incorporated by reference the Statement of the Case and the Standard of Review set out in the Initial Brief of the Respondents Dean B. Bell and The Law Offices of Dean B. Bell, LLC. A member of Dean B. Bell’s family advised the undersigned that Dean B. Bell died on May 28, 2020. Mr. Bell represented himself and his law firm *pro se* and no one has appeared to represent Mr. Bell or his law firm since his death. The Respondent is

concerned that a Final Brief will not be submitted by The Respondents Dean B. Bell and The Law Offices of Dean B. Bell, LLC. Therefore, Respondent seeks an Order of this Court allowing it to amend its Initial Brief to actually state the Statement of the Case and the Standard of Review.

June 8, 2020



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Hilton Head Island, SC 29938

Attorneys for Respondent  
B. Hammel Properties, LLC

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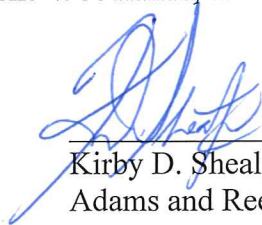
v.

Dean B. Bell, individually;  
Law Offices of Dean B. Bell, LLC; and  
B. Hammel Properties, LLC.....Respondents.

**PROOF OF SERVICE**

I certify that I have caused to have served the foregoing Motion to Amend Initial Brief on the Appellant, Charles E. Houston, Jr. by having a copy deposited in the United States Mail, postage prepaid, on June 8, 2020 addressed to Mr. Charles E. Houston, Jr., 100 Shady Brooke Walk, Fayetteville, Georgia 30214.

I further certify that I caused to have served the foregoing Motion to Amend Initial Brief on the Respondent Dean B. Bell, individually and the Respondent the Law Offices of Dean B. Bell, LLC by having a copy deposited in the United States Mail, postage prepaid, on June 8, 2020, addressed to 4747 Research Forest Dr. Ste. 108#242, The Woodlands, TX 77381.



\_\_\_\_\_  
Kirby D. Shealy  
Adams and Reese LLP

June 8, 2020

Via OneDrive

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals

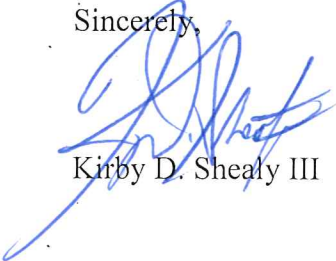
RE: *Charles E. Houston, Jr. v. Dean B. Bell, et al.*  
Appellate Case No. 2019-001676  
A&R File No. 050168-000411

Dear Ms. Kitchings:

I am hereby filing the Respondent B. Hammel Properties, LLC's Motion to Amend Initial Brief and Proof of Service in the referenced case. Under separate cover, I am placing in today's mail a check in the amount of \$50.00 to cover the filing fee for this Motion.

Thank you for your assistance with this matter.

Sincerely,



Kirby D. Shealy III

KDSIII/jas

Enclosure(s)

cc: *via U.S. Mail and E-Mail w/encl.*

Mr. Charles E. Houston, Jr.

Dean B. Bell, Esq.

cc: *via E-Mail w/encl.*

Thomas C. Taylor, Esq.

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