

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Hon. Edgar W. Dickson, Judge

RECEIVED

Jul 15 2020

SC Court of Appeals

Appellate Case No. 2019-001676

CHARLES E. HOUSTON JR

Appellant

V.

Dean B. Bell, individually
The Law Offices of Dean B. Bell, LLC
And B. Hammel Properties, LLC

Respondents

APPELLANT'S MOTION TO FILE AMENDED REPLY

Charles E. Houston, Jr.
100 Shady Brooke Walk
Fayetteville, Georgia 30214
Appellant, *Pro Se*

Fayetteville, Georgia
July 14, 2020

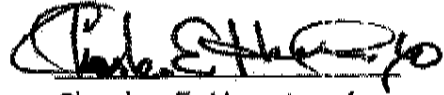
THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

The Appellant, Charles E. Houston Jr., would move the Court, pursuant to Rule 208 SCACR and Rule 240, SCACR for an Order, permitting the Appellant, to file an Amended or Supplemental Reply Brief in this appeal pending before this Court.

The grounds for this motion is that since the filing of his Reply Brief, the Respondent, B. Hammel Properties, LLC upon obtaining the consent of this court, granted by order of this Court has filed an served an Amended Brief on July1, 2020.

The Amended Brief contains supplemental arguments and authorities not set forth in its prior submitted Respondent's Brief. The Appellant, in the furtherance of the interest of justice being served, would desire the opportunity to respond to the Amended brief by being granted the permission of this Court to file an Amended or supplemental reply.

Respectfully submitted



Charles E. Houston Jr.
100 Shady Brooke Walk
Fayetteville, Georgia 30214
Appellant, *Pro Se*

July 14, 2020
Fayetteville, Georgia

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

Jul 15 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.

PROOF OF SERVICE

I certify that I have caused to have served the foregoing Appellant's MOTION TO FILE AN AMENDED OR SUPPLEMENTAL BRIEF. on Respondent B. Hammel Properties, LLC by having a copy deposited in the United States Mail, postage prepaid, on July 14, 2020 addressed to

W. Cliff Moore, III
Adams and Reese, LLP
PO Box 2285

And

Thomas C. Taylor, Esquire
Law Offices of Thomas C. Taylor, LLC
PO Box 5550
Hilton Head Island, SC 29938
Attorneys for B. Hammel Properties, LLC

And

Dean B. Bell, Esquire and
The Law Offices of Dean B. Bell, LLC
4747 Research Forest Dr. Ste. 108 #242,
6120 College Street, Suite D121
The Woodlands, Texas 77381

Attorney for Dean B. Bell and the Law Offices of Dean B. Bell

Additional service was also sent by email with enclosures as follows:


Cliff Moore

sboone@deanbemm-law.com

tom@thomastaylorlaw.com

Kirby D. Shealy III

Jennifer Shirey



Charles E. Houston, Jr.

Re: SC Court of Appeals: Charles E. Houston, Jr. v. Dean B. Bell (2019-001676)

July 15, 2020 at 12:46 PM

From Charles Houston

To Jennifer Shirey

Cc "Charles Houston (emailcharleshouston@aol.com)", "dbell@deanbell-law.com", "sboone@deanbell-law.com", Cliff Moore, "Kirby D. Shealy III", "tom@thomastaylorlaw.com"

  Motion to ...ntal Reply.pdf 364.01 KB

Good Afternoon,

Please find attached correspondence I mailed to the Clerk of Court for the filling of the Appellant's Motion to File an Amended and/or Supplemental Reply Brief.

Thank you.

Charles Houston

On July 9, 2020 at 10:05 PM, Charles Houston <charlesehouston@icloud.com> wrote:

Attachments available until August 8, 2020.

Good Evening,

Please find attached correspondence I am mailing to the Clerk of Court for the filling of the Appellant's Brief. Likewise, I am serving on Dean Bell and the Bell Law Firm a copy of the Record on Appeal that has been previously filed but not served upon you.

Thank you.

Charles Houston

Download from iCloud
RECORD ON APPEAL.pdf
22.21 MB

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APPELLANT'S BRIEF.pdf
2.34 MB

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ltr to Ct ...ls 6-26-20.pdf
55.52 KB

Download from iCloud
2020-07-06...tial Brief.pdf
3.21 MB

On July 6, 2020 at 2:51 PM, Jennifer Shirey <Jennifer.Shirey@arlaw.com> wrote:

Good afternoon,

Charles E. Houston, Jr.
100 Shady Brooke Walk
Fayetteville, Georgia 30214

843-684-0211

emailcharlosehouston@icloud.com

July 14, 2020

Hon. Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
P.O. Box 1629
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

Jul 15 2020

SC Court of Appeals

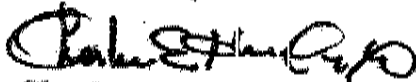
Charles E. Houston Jr. V. Dean B. Bell, et. al
Appellate Case No. 2019-001676
Appellant's Motion to File Amended or
Supplemental Reply

Dear Ms. Kitchings:

I am submitting for filing with the Court the original, Appellant's Motion to File his Amended or Supplemental Reply along with the Proof of Service upon all counsels of record

By copy of this letter via U. S. Mail and email, I have furnished and served a copy of the same upon the Respondents' counsels as indicated on the enclosed Proof of Service.

With kind regards, I remain
Respectfully



Charles E. Houston, Jr.

cc: W. Cliff Moore III Esq.
Thomas C. Taylor, Esq.
Dean B. Bell, Esq.

Encls: as stated