

**THE STATE OF SOUTH CAROLINA**  
In The Court of Appeals

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SC Court of Appeals

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**APPEAL FROM JASPER COUNTY**

Court of Common Pleas  
The Honorable Carmen T. Mullen, 14<sup>th</sup> Circuit Court Judge  
Trial Court No 2017CP2700386

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Appellate Case No. 2018-002186

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Greg Hackney.....Appellant

V.

First Team Hyundai, LLC d/b/a Hilton Head Hyundai .....Respondent

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**Response to Respondents Response to  
Appellant Motion for Immediate Dismissal**

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In both Appellant Responses to the Appellant Court, the Respondent does not deny that 27 pages are missing from Jasper County Publix Index. Understanding I am not an Attorney, other case documents are included in the Jasper County Publix Index confirming entry errors of my October 31, 2018 documents. Is the Respondent accusing me of adding these documents?

My request on June 22nd, 2020 was for 90 Days/Motion To Stay extension to enter Record of after meeting with the Jasper County Court to discuss the missing documents, as stated upon entering my Record of Appeal; the Appellant Court allowed 5 months but as noted the Jasper County Court would not even respond to my request for a court hearing. Noted, not denying my request but just ZERO Response.

The Respondant states in their Return to Appellants Motion that I entered the Record of Appeal 5 months later, perhaps they should read the order; the record of Appeal was entered within the order timeline including the requested changes.

The Respondent noted the 700 pages I submitted and states "it Appears" I included the 27 pages excluded omitted by the Jasper County Court; I suggestion they read the 700 pages.

Respondents "it appears" confirmed that the are aware of the 27 pages in their documents Submitted October 31st, 2018 confirming they are not in the Jasper County Public Index.

The Respondent confirms in paragraph three I included the exhibits and as stated I complied with the May 22nd, order but stated the document Provisional and Contested since I am allowed to use the documents presented during my hearing. I appears in their argument I did fulfill the May 22nd, 2020 but difficult to read because the pages are not numbered, not sure why they are not as the one online filed by the court does have page numbers.

I filed a provisional record of Appeal to comply but the Order but also submitted a motion to dismiss because I entered evidence to this court the Jasper County Court made errors entering the 220 pages from the October 31st 2018 hearing thus not allowing me to present my case to the Appellant Court via accurate and Fair Record of Appeal. The Respondent does not provide evidence the record of appeal in inaccurate, only hard to read because of 700 pages. Entering 700 pages

confirms my efforts in preparing for the case that will lack the documents necessary to fully represent myself because of entering errors by the lower court.

As stated and evidence provided to the court, there are pages entered by the Jasper County court: out of numerical order, documents entered from another case including excluding 27 pages that the Appellant does not deny are not entered. Noted, Respondant's response to both motions only provides distractions from my point that I cannot defend myself to the court because documents presented on October 31, 2018 cannot be used in the Appellant Court because of document entry errors.

The Respondent responds there are 27 document I Submitted to them but do not appear in the Jasper County Publix index.

Regarding my Request for a new Hearing, I submitted multiple persons that would be called to witness during trial but was not allowed enough time to get with them as such provide evidence at the court hearing. Appellant states there was adequate time to call witnesses, what their attorney does not state is that the original court date was 9 days after the request Motion for Partial Summary judgement, then changed to another Judge/Date and then back to Mullin with the October 31st 2018 date. Very difficult to subpoena and schedule/subpoenaed witness as the dates changed twice during the 2 month window. Noted the first court date was 9 DAYS after the Partial Summary Judgement Request, hardly enough time to gather evidence from 30 individuals. Also, the court knew I was acting as Self represented as such no staff, is 60 days enough time for a self represented individual to prepare for a trial? I explained to the court as such! The Appellant states Jasper Count Sheriff would not respond to phone calls and Fed Ex documents, they would have to respond to a Subpoena, but not give enough time!

In Response to their request to dismiss in their favor, I submitted a 700 pages Record Of Appeal and they cannot provide any evidence it does not comply, only state hard to determine additional errors because of pages are not numbered, what does page numbers have to do with content of a document. If required I will send a numbered document, as stated the court entered document is numbered


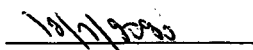
My request to the court is simple, I have provided evidence that 220 documents were submitted to the court during the October 31, 2018 hearing and 27 pages were not entered in the Jasper County Publix Index. One of the documents and video is of the Appellants Security Team following me to another location thus documented Victim Form give to me by the Jasper County Police. Key evidence required for my defense cannot be used including added to my Record Of Appeal.

As stated above, the appellant does not argue there are missing documents, interesting they request me to press on asking me to submit an unfair Record of Appeal, would they?

As such since I cannot fairly represent myself with that same documents presented in the October 31st, 2018 trial I request my dismissal to be granted including a new hearing in another county.

Also, request for a new hearing and date that will allow me more than 60 days to gather testimony and properly submit subpoena's.

Greg Hackney

6125 Roswell Road #145  
Sandy Springs, Georgia 30328  
678-855-2975  
Self-Represented  
Appellant

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**Proof Of Service**  
**Response to Respondents Response to**  
**Appellant Motion for Immediate Dismissal**

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Certify I have served Respondent Appellant Request for Dismissal by depositing a copy in the US Mail, postage prepaid, on December 7th, 2020 addressed to Brad Martin, Post Office Box 10410 Greenville, South Carolina 29603.

Greg Hackney  
6125 Roswell Road #145  
Sandy Springs, Ga. 30328  
678-855-2975  
Self-Represented  
Appellant: Greg Hackney

  
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12/7/20

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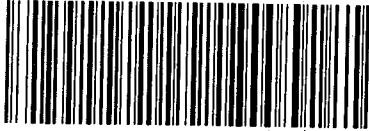


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