

Rufus L. Griffin
313 Fifth Avenue
McCormick, SC 29835

March 31, 2021

Attn: Jenny Abbott Kitchings, Clerk
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Rufus Griffin v. Mosley
Appellate Case No. 2019-001428

RECEIVED

Mar 31 2021

SC Court of Appeals

Dear Ms. Kitchings,

I am in receipt of your letter dated March 26, 2021, informing counsel in the above referenced case to now provide one bound copy each of the Record on Appeal and Final Brief. My letter today is in regard to the court's letter, section 1(b): *The name and contact information of all counsel representing the parties to the appeal; Please do not include names of counsel that have not previously made an appearance in this case.*

My question is concerning counsel for Respondent, Paquita Mosley. When Appellant initially filed his Notice of Appeal, Appellant included the known counsel of record at that time for Ms. Mosley: Rachael A. Dain and Palmer Freeman, Jr. However, since the civil case dismissal from the lower court, I have not received anything from attorney Palmer Freeman, Jr. to reflect his ongoing representation of Ms. Paquita Mosley, nor his withdrawal or release. Since the initial November 2019 Notice of Appeal, both the Court of Appeals and I have included Mr. Freeman in all correspondences, but he has not made an appearance to the Court in representation of Ms. Mosley in this appellate action.

On January 6, 2020, counsel Rachael A. Dain filed a Motion for Extension of Time and explained that she alone was preparing the Initial Respondent's Brief. She did not report any co-counsel assisting her in her representation of Ms. Paquita Mosley in this appeal and did not serve attorney Palmer Freeman. On January 15th, 2020, Appellant issued a Reply to Ms. Dain's Motion for Extension, by alerting the Court of the concern that Ms. Dain's motion disregarded any co-representation with Mr. Freeman. Appellant's 'Reply' was served upon both counsel, Dain and Freeman. Therefore, both attorneys, Dain and Freeman, were fully aware that Appellant questioned the continued representation of Mr. Freeman (from the civil court representation into the appellate action).

Since that time, over a year ago, counsel Rachael A. Dain, has continued to exclude counsel Palmer Freeman on her documents, including certificates of service, as

co-counsel. However, Mr. Freeman has never presented documentation to reflect a motion to withdraw as co-counsel or any such relief from that position since he appeared as such in the final hearing of the civil court case. Yet, the Final Brief of Respondent, provided by counsel Rachael A. Dain in the appeals case, still does not include the name of co-counsel, Palmer A. Freeman, Jr.

Therefore, as my final bound Record on Appeal (according to instructions in the court's 3/26/21 letter, section 1(b)), *should include only the attorneys who have made an appearance* in this case, I'm asking the court's clarification and advisement on the inclusion of attorney Palmer A. Freeman, Jr., (who has never made an appearance in this case and has not been included in the Respondent's final brief, but has been included on the March 26th letter from the court and previous court correspondences).

Appellant further requests an extension of time, in addition to the original 10 days, for providing the bound copies of his Record on Appeal and Final Brief, as Appellant awaits clarification and advisement of the Court of Appeal's position on the inclusion of counsel Palmer A. Freeman, Jr. in any final bound submissions by the parties.

Yours truly,



Rufus L. Griffin, pro se

P.S.

Just bringing to the Court's attention for the sake of consistency among all: The Court of Appeals letter dated March 26, 2021, which was intended to provide the preferred captioning for counsel to use in submission of final bound briefs, contained a small typo: Respondent, Paquita Mosley, is misspelled 'Pauquita' on page 2 of that letter.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Appellate Case No.: 2019-001428

SC Court of Appeals

APPEAL FROM EDGEFIELD COUNTY

Court of Common Pleas

Alison Renee Lee, Chief Administrative Circuit Court Judge

Rufus Lyndell Griffin,

Appellant

v.

Thomas Mosley, Quinnie Mosley, Walter Mosley, Timothy Mosley,
And Paquita Mosley, Individually and as Personal Representative
Of the Estate of Ellec Mosley,

Respondents

CERTIFICATE OF SERVICE

The undersigned, Rufus L. Griffin, certifies that Appellant's letter to the SC Court of Appeals, dated March 31, 2021 was served upon the following counsel for Respondents by deposit in the US Mail, on the 31st day of March 2020:

Rachael A. Dain, Esq, 810 Dutch Square Blvd., Ste 215, Columbia, SC 29210-7318 &
Palmer Freeman, Jr., Esq., PO Box 8024, Columbia, SC 29202

And delivered to the SC Court of Appeals via U.S. Mail, addressed to P.O. Box 11629, Columbia, SC 29211 and by email to 'ctappfilings@sccourts.org'.



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