



- a. The Sumter County Court of Common Pleas held an appeal hearing on 13 September 2021 *after* Notice of Removal; Hon. Judge Ferrell R. Cothran presiding;
  - b. The Sumter County Court of Common Pleas entered an order that dismissed the Plaintiff's appeal on 4 October 2021 *after* service of Notice of Removal twice; and
  - c. Sumter Magistrate Fred H. Gordon, Jr. issued a second Writ of Ejectment on 5 October 2021 after the Plaintiff's service of the Notice of Removal.
2. All three events occurred **after** Notice of Removal was served upon the State Courts in accord with 28 U.S.C. §1446(d). These events contradict the recent notice of the S.C. Court of Appeals to hold the Plaintiff's appeal in abeyance (Case No. 2021-001128) until the matter is remanded by the federal court. It may be implied that if the S.C. Court of Appeals<sup>1</sup> suspended its jurisdiction unless and until the matter is remanded, the State's lower courts also should conduct itself in the same manner.

#### **EVIDENCE OF PROMPT NOTICE TO CLERK OF COURT—COMMON PLEAS**

3. First, the Sumter County Court of Common Pleas proceeded to hold an appeal hearing on 13 September 2021 despite the fact that prompt notice of the Notice of Removal was served upon the Clerk of Court, James C. Campbell. On 13<sup>th</sup> September, the Plaintiff filed her Notice of Removal at the federal courthouse in Columbia, S.C. at 9:33 a.m. EST and immediately returned to Sumter County Court of Common Pleas and served notice on the Clerk of Court at approximately 10:56 a.m., right before the scheduled hearing.
4. In addition, at the start of the said hearing, the Plaintiff informed the Hon. Judge Ferrell R. Cothran of the federal filing and provided him with the relevant case number and number to court services. Nevertheless, the State Court insisted on holding a hearing and did not adhere

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<sup>1</sup> Although the S.C. Court of Appeals sent its correspondence to Hunter El on 8 October 2021, she has not heard from the S.C. Supreme Court whether her Petition for Extraordinary Writ, Writ for Injunction will be granted or denied.

to 28 U.S.C. §1446(d) which states that after prompt written notice to clerk of the State Court, “*which shall effect the removal...the State court shall proceed no further unless and until the case is remanded*”.

5. When Judge Ferrell acted in deliberate indifference to his oath of office, the Plaintiff asked Judge Cothran to recuse himself and also because she recalled his previous recusal from an unrelated case. The Plaintiff also asserted her right to move for substitution of judge, but Judge Ferrell was adamant.

#### **Negligence Per Se, Clerk’s Breach of Duty**

6. In addition, the Plaintiff was not given sufficient time to present her appeal by compelling witnesses and/or documents for three reasons:
  - a. First, the Plaintiff did not receive adequate ‘*Notice of Case Scheduling*’. The Clerk of Court, James C. Campbell’s notice for the Monday, 13 September 2021 hearing is dated Thursday, 9 September 2021. She took cognizance of the scheduled appeal hearing by viewing the online court roster for the Third Judicial Circuit and calling the Court of Common Pleas for verbal confirmation that the case was set to be heard on Monday, 13 September 2021 at 11:00 a.m. When this fact was brought to the attention of deputy clerk, Sherry Yow she remarked that sometimes parties receive notice the next day. Ms. Yow’s statement implied that the Plaintiff would have received notice of the scheduled hearing on Friday, 10<sup>th</sup> September. Yet, it is fact that the Clerk’s notice was postmarked 10<sup>th</sup> September from a U.S.P.S. mail facility in Columbia, S.C. Further, the Plaintiff did not receive the physical mail the next day, but on Tuesday, 14<sup>th</sup> September 2021, too late for her to take cognizance by mail.

- b. Second, the Clerk of Court, James C. Campbell did not provide written notice that Magistrate Fred H. Gordon, Jr. filed his return on 9 September 2021 and that the record on appeal was received from the lower court. The Clerk of Court failed to adhere to case processing procedures for the Court of Common Pleas. The Clerk's Manual, published by the South Carolina Judicial Department states in Chapter 6, §6.2.2 "*Notice of Appeal to Circuit Court*" that the Clerk was required to send notice to all parties that record was received from the lower court, Rule 75, South Carolina Rules of Civil Procedure (SCRCP) and that return was filed, Rule 18 South Carolina Rules of Magistrate Court (SCRMC). Here, the record indicates that Magistrate Gordon, Jr. filed his return on 9 September 2021, the same day the Clerk of Clerk mailed his '*Notice of Case Scheduling*'. However, the plaintiff did not receive oral or written notice from Mr. Campbell that the Magistrate filed his return.
- c. Third, the Magistrate's Return states that copies of all filings submitted to the Summary Court are included with his return. Rule 75, SCRCP holds that the Clerk of Circuit Court is required to give written notice to the party that the record of appeal has been filed. The original record must be certified and transmitted by the clerk of lower court within 30 days to the clerk of the Circuit Court. The plaintiff was unable to review the official record or read the Magistrate's return prior to the 13<sup>th</sup> September hearing. Undoubtedly, the record is a very important part of the appeal and this statutory requirement is codified in S.C. Code of Law 18-7-60. Again the Plaintiff was not afforded sufficient time to present affidavits to Judge Cothran, pursuant to S.C. Code of Law 18-7-150 as he chose to proceed despite notice of removal. She was unable to demonstrate, on the merit, why the Circuit Court should

set aside the trial court's judgment and order a new trial before the same magistrate since the Clerk of Court failed to provide notice that the Magistrate's return was filed along with the record of appeal.

7. At the conclusion of the hearing, Judge Ferrell asked the parties to submit supporting documents within 10 days. Three days later, on 16 September 2021, the Plaintiff made a request for a copy of the transcript with the court reporter and in the meantime filed a timely Motion for Extension of Time on 22 September 2021. The motion was not docketed or decided in chamber, nor did Elijah Hunter file a response objecting to the motion.
8. Moreover, on 14<sup>th</sup> September, hard copies of the said Notice of Removal were mailed by U.S.P.S. first-class mail to both the Sumter County Court of Common Pleas and the Sumter Magistrate Court, delivered on or about 17<sup>th</sup> September<sup>2</sup>. Thus, the Court of Common Pleas Clerk received notice twice, first on 13<sup>th</sup> September prior to the scheduled hearing and again on 17<sup>th</sup> September by mail. Therefore, even if the Court of Common Pleas conducted an initial appeal hearing on Monday, 13<sup>th</sup> September, it should have halted from taking any further action after receipt of the mail copy. Instead, it ended the appeal and at present, there is nothing to remove despite the fact that any objections to Magistrate's Gossett Report and Recommendation are due this Thursday, 14<sup>th</sup> October.

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<sup>2</sup> Prior to the Plaintiff's appeal to the Sumter County Court of Common Pleas, her first Notice of Removal was mailed to the Sumter Magistrate Court on 4 September 2021, by U.S.P.S. Priority Mail 1-Day Flat Rate Env with Tracking # 9505 5111 5213 1247 3209 06. The U.S.P.S. tracking shows the mailpiece was delivered on September 7, 2021 at 9:40 am.

After the U.S. Labor Day holiday, the first Notice of Removal was also promptly served upon the Carla Brayboy, the Clerk of the Civil Division of the Magistrate Court in person on 7 September 2021 at 9:26 a.m. in the present of Magistrate Fred H. Gordon, Jr. and Chief Magistrate William Mattison Gamble.

The first Notice of Removal was stamped received on 7 September 2021 at 1:47 p.m., by the USDC-DSC Clerk of Court. On 8 September 2021, the date and time stamp was stricken and returned to the Plaintiff to correct deficiencies in her filing. The Plaintiff corrected her filing and resubmitted her filing on Monday, 13 September 2021 in person at the courthouse in Columbia.

## **DISMISSAL LEAVES NOTHING TO REMOVE**

9. On 4 October 2021, Judge Cothran instructed the Clerk of Court to enter an order that dismissed the Plaintiff's appeal pursuant to Rule 41a South Carolina Rules of Civil Procedure (SCRCP). Again, the order entered by Judge Cothran shows that State Court acted in contradiction to federal statute even 20 days after prompt notice was given to the Clerk of Court that a Notice of Removal was filed in the USDC-DSC.

## **EVIDENCE OF PROMPT NOTICE TO CLERK OF COURT—MAGISTRATE COURT**

10. As discussed *supra*, the Magistrate Court was served the Notice of Removal accepted by the USDC-DSC by mail on or about 17 September 2021. However, the record shows that the Magistrate was served an initial Notice of Removal earlier.
11. Prior to the Plaintiff's appeal to the Sumter County Court of Common Pleas, her first Notice of Removal was mailed to the Sumter Magistrate Court on 4 September 2021, by U.S.P.S. Priority Mail 1-Day Flat Rate Env with Tracking # 9505 5111 5213 1247 3209 06. The U.S.P.S. tracking shows the mailpiece was delivered on September 7, 2021 at 9:40 am.
12. After the U.S. Labor Day holiday, the first Notice of Removal was also promptly served upon the Carla Brayboy, the Clerk of the Civil Division of the Magistrate Court in person on 7 September 2021 at 9:26 a.m. in the presence of Magistrate Fred H. Gordon, Jr. and Chief Magistrate William M. Gamble.
13. The first Notice of Removal was stamped received on 7 September 2021 at 1:47 p.m., by the USDC-DSC Clerk of Court. On 8 September 2021, the date and time stamp was stricken and returned to the Plaintiff to correct deficiencies in her filing. The Plaintiff corrected her filing and resubmitted her filing on Monday, 13 September 2021 in person at the courthouse in Columbia and promptly served this copy on the trial court.

14. Thus, even if the appeal in the Court of Common Pleas was dismissed and the Magistrate's judgment was affirmed, the trial court should not have issued a second Writ of Ejectment unless and until the case is remanded by the federal court.

#### **PRELIMINARY INJUNCTION NECESSARY TO STAY WRIT OF EJECTMENT**

15. The second writ of ejectment was issued on 5 October 2021 and served upon Plaintiff on 6<sup>th</sup> October requires the Plaintiff to voluntarily vacate her premises within 24 hours.. The warrant, if executed, gives the Sumter County Sheriff's Office the authority to use necessary force to remove the Plaintiff from her premises and to deposit her property on the roadside.

16. After learning of Judge Cothran's order, the Plaintiff filed a Notice of Appeal and an Emergency Motion for Writ of Injunction with the SC Court of Appeals, Case No. 2021-001128.

17. On 8 October 2021, the S.C. Court of Appeals held the appeal abeyance, stating it had no jurisdiction to take action on the Emergency Motion for Writ of Injunction "*pending conclusion of the removal action with the federal district court.*" The Plaintiff is not yet in receipt of the correspondence but takes cognizance from the S.C. Judicial Department online "*C-Track Public Access*" portal.

18. In her Emergency Motion for Injunction, the Plaintiff argued that a *supersedeas* is not automatic in an ejectment case (see Rule 241, SCRCPP, S.C. Code of Laws §15-67-640, S.C. Code of Laws §18-7-10, and S.C. Code of Laws §27-37-130), but requires the Plaintiff to post a bond similar to the security required under Rule 65(c), FRCP.

19. The full procedural history is included herein. Briefly, Magistrate Gordon prematurely issued his Writ of Ejectment on the same day instead of waiting the prescribed statutory

period of five days after announcing his decision. Specifically, the Magistrate did not act in accord with S.C. Rules of Magistrate Court (SCRMC, Rule 1 and Rule 3), the expiration of five days was Monday, 13 September 2021<sup>3</sup> excluding Saturday, Sunday and the U.S. Labor Day holiday since the prescribed period was less than seven days.<sup>4</sup> Thus, the Appellant did not have the ability to seek an injunction and post the necessary bond prior to the first warrant going forth.

20. Thus, absent a preliminary injunction, Plaintiff is likely to suffer an immediate housing crisis during the COVID-19 pandemic. Attached to the Writ of Ejectment is Elijah Hunter's "Certification of Compliance" that the property is **not** a "covered dwelling" as defined by the *Coronavirus Aid Relief and Economic Security Act ("CARES Act")*.

#### **FULL PROCEDURAL HISTORY<sup>5</sup>**

1. This is the Appellant's appeal from the Sumter County Magistrate Court.
2. On 16 August 2021, the Defendant, Elijah Hunter executed an Affidavit on the *Application for Notice to Quit Premises*, that Plaintiff was trespassing at 3400 Hwy. 261 North, Rembert, S.C. 29128 without permission of the owner of the said premises. The Application For Notice to Quit Premises is governed by S.C. Code of Laws §15-67-0610. Attached to Elijah's Hunter application was a "Certification of Compliance with the Coronavirus Aid, Relief, and Economic Security Act", the Sumter County Property for the Year 2009 (12 years

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<sup>3</sup> South Carolina Rules of Magistrate Court. RULE 1: DEFINITIONS. "Working day" means a day which is not a Saturday, Sunday, or legal holiday under state or federal law."

<sup>4</sup> South Carolina Rules of Magistrate Court. RULE 3: COMPUTATION OF TIME PERIODS. "In computing any period of time prescribed or allowed by these rules, by order of the court, or by any applicable statute, the day of the act, event, or default after which the designated period begins to run is not to be included. The last day of the period so computed is to be included in the period unless it is not a working day, in which event the period runs until the end of the next day which is a working day. **When the period of time prescribed or allowed is less than seven days, Saturdays, Sundays, and holidays shall be excluded in the computation.** A half holiday shall be construed as a working day."

<sup>5</sup> The terms Plaintiff, Defendant, Appellant, and Respondent are used in context of the procedural posture at the date and time the event occurred.

ago), a Sumter County Tax Receipt for the 1983 Havelock trailer he resides in that is the property of the Heirs of Nellie Holmes, the Appellant's and Defendant's great aunt and aunt, respectively.

3. On 18 August 2021, then, the Plaintiff was served with the Notice to Quit Premises in-person by Sumter County Sheriff Office (SCSO), Sr. Cpl. Thomas at 3390 Highway 261 North, Rembert, S.C. 29128. The notice was served twice, upon Regina Mack and Regina Hunter at 07:49 a.m. EST. However, the Plaintiff does not have a mail receptacle at this address and leases a box at the UPS Store in Sumter, S.C.
4. On 18 August 2021, Cynthia Owens of 120 Perkins Avenue, Sumter, S.C. 29150, executed a *“Limited Power of Attorney for Business for Elijah Hunter.”*
5. On 19 August 2021, the Defendant wrote the Summary Court for additional time to show cause as to why the ejectment should not occur. Neither the assigned Magistrate nor any clerk responded in writing.
6. On 23 August 2021, the Defendant called and spoke with Carla Brayboy, the managerial clerk for the Civil Desk Sumter County Magistrate Court.
7. On 23 August 2021, the record shows the Summary Court mailed its summons to the Defendant and the Plaintiff to appear personally for a bench trial in the case.
  - a. A summons was mailed to “Regina Hunter” at 3400 Highway 261 N, Rembert, S.C. 29150. However, the zip code is incorrect and the Plaintiff did not receive the mailpiece.
  - b. A summons was mailed to “Regina Mack” at 3400 Highway 261 North, Rembert, S.C. 29128. However, the Plaintiff's legal name is Regina M. Hunter and the Plaintiff did not receive the mailpiece.

- c. A summons was mailed to Elijah Hunter at 3400 Highway 261 N, Rembert, S.C., 29128.
8. On 26 August 2021, Elijah Hunter sent a three page letter to the Magistrate that he sent to the S.C. Governor, Hon. Henry McMaster, Alan Wilson, S.C. Attorney General and the Hon. Dale Atkinson, Probate Judge for Sumter County. Mr. Hunter's letter makes a number of allegations unrelated to the appeal before the court.
  - a. The letter incorrectly refers to the Plaintiff as Regina Mack. The Plaintiff legally changed her name to Regina Michelle Hunter effective 21 May 2012 with the Family Court (3<sup>rd</sup> Jud. Circuit).
  - b. His letter also indicated that the Respondent knew the Appellant received her mail at 1165 Broad St. #16, Sumter, S.C. 29150.
9. On 2 September 2021, the Summary Court conducted a hearing where the Elijah Hunter was present and the defendant was not present because she had no knowledge that a hearing was scheduled; as discussed *supra*, the court summons was not mailed to the correct address.
10. On 2 September 2021, the Fred H. Gordon, Jr., Magistrate prematurely entered a judgment for the Plaintiff and granted his application. S.C. Code of Laws 15-67-640 holds that the Magistrate only may issue his writ of ejectment five days after announcing his decision.
11. On Friday, 3 September 2021, a Writ for Ejectment was post conspicuously on the Plaintiff's premises to voluntarily vacate within 24 hours.
12. On Tuesday, 7 September 2021, the Plaintiff visited the Summary Court to determine whether her Emergency Motion to Vacate Judgment would be granted. The Plaintiff filed an Amended Answer citing the Magistrate's limited jurisdiction when the title to real property is

brought into question. She met with Magistrate Gordon, Jr. and Chief Magistrate William M. Gamble. Court was held instanter, but no relief was granted. The Appellant's only recourse was to file a Notice of Appeal in the Sumter County Court of Common Pleas to avoid execution of the warrant.

13. On Thursday, 9 September 2021, the Clerk of Court, James C. Campbell mailed a Notice of Case Scheduling to Regina M. Hunter at 1165 Broad Street #16, Sumter, S.C. 29150. However, it was too late for her to take cognizance by mail. The postmark is dated 10 September 2021 and was routed through Columbia, S.C.
14. The Appellant took cognizance of the scheduled appeal hearing by viewing the online court roster for the Third Judicial Circuit and calling the Court of Common Pleas for verbal confirmation that the case was set to be heard on Monday, 13 September 2021 at 11:00 a.m.
15. On Monday, 13 September 2021, the Plaintiff filed a Notice of Removal of a Civil Action in the United States District Court for the District of South Carolina. The case number is 3:21-cv-2929-MBS-PJG at 9:33 a.m.
16. On Monday, 13 September 2021, the Appellant filed a complaint against Elijah Hunter and the Sumter County Magistrate Court in the United States District Court for the District of South Carolina. The case number is 3:21-cv-2829-MBS-PJG at 9:33 a.m.
17. At 10:36 a.m., the Appellant served a copy of the Notice of Removal upon the Sumter County Clerk of Court, James C. Campbell.
18. On Monday, 13 September 2021, the parties<sup>6</sup> appeared in an appeal before Judge Cothran. The Court asked the parties to submit relevant documentation within 10 days pursuant to Rule 6(a) Time: Computation (a), by Wednesday, 23 September 2021.

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<sup>6</sup> Elijah Hunter appeared in-person and due to a hearing impairment and received an accommodation for Cynthia Owens, with Power of Attorney to speak on his behalf.

19. On 16 September 2021, the Appellant requested an expedited copy of the transcript for the above-captioned hearing with Tammie M. Holmes, Court Reporter Manager for the South Carolina Judicial Branch. The hearing was recorded using the Digital Court Reporter Program (DCRP) for Calendar 13. On 28 September Julie A. Cendroski, Circuit Court Reporter III for the Seventh Judicial Circuit responded with the correct pricing for an expedited transcript and the transaction is pending.
20. On 22 September 2021, Appellant filed a Motion of Extension of Time (Enlargement) with the Circuit Court of Common Pleas—the motion was not set on the Motions Calendar or decided in judge's chamber.
21. On 4 October 2021, when the Petitioner called the Court of Common Pleas Clerk of Office she learned that a judgment on the appeal was entered in favor of the Defendant, affirming the decision of the lower court. Thus, the Appellant filed a Petition for Extraordinary Writ (Writ of Injunction) with the S.C. Supreme Court to preserve the Petitioner's right to appeal within the prescribed time period. Here, the Appellant also files a Motion for a Writ of Injunction with the Court of Appeals.
22. On 5 October 2021, Elijah Hunter obtained a new Writ for Ejectment document from the Summary Court. Therefore, it is in the posture that the Appellant files and serves her Notice of Appeals on the parties.
23. On 5 October 2021, Hunter El filed a Notice of Appeal with the S.C. Court of Appeals, the case as docketed under Case No. 2021-001128 by electronic means.

24. On 8 October 2021, the S.C. Court of Appeals sent correspondence stating it would hold the appeal in abeyance, stating it lacked jurisdiction and until the matter was remanded by the federal court.

WHEREFORE, the Plaintiff prays this Court will grant a preliminary injunction to stay execution of the warrant and permit her time to file objections to the Magistrate's Report and Recommendation despite its resolve to summarily dismiss without prejudice and without issuance and service of process.

Respectfully submitted,

A handwritten signature in cursive script that reads "Regina M. Hunter El".

I Am: Regina M. Hunter El  
All Rights Reserved  
A Natural Person, In Full Life, In Propria Persona, Sui Juris

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Case No. 3:21-cv-2929 MBS-PJF

**AFFIRMATION OF EFFORTS  
TO CONFER WITH  
OPPOSING PARTY**

Regina M. Hunter El )  
1165 Broad St. #16 )  
Sumter, S.C. 29150 )

*Plaintiff(s)* )

v. )

Elijah Hunter )  
3400 Hwy. 261 North )  
Rembert, S.C. 29128 )

*Defendant(s)* )

Appeal from  
Court of Common Pleas, Sumter County  
Case No. 2021-CP-43-1534  
Hon. Ferrell R. Cothran

Appeal from  
Summary Court, Sumter County  
Case No. 2021CV4310102733  
Fred H. Gordon, Jr., Magistrate

**AFFIRMATION OF EFFORTS TO CONFER WITH OPPOSING PARTY**

NOW COMES, the Plaintiff to state that a conference and attempt in good faith to consult with the opposing party to resolve the matter contained in the motion could not be held because:

1. The record shows that Elijah Hunter filed an incident report with the Sumter County's Sheriff's Office on or about 18 August 2021 alleging that the Plaintiff's tampered with his roadside mailbox.
2. Since, Elijah Hunter claims the Plaintiff is the proximate cause of his past and current medical conditions, the Plaintiff's hold it's in her best interest to maintain distance.
3. Also, the Plaintiff's familial relationship with Elijah Hunter is estranged since he executed, in her opinion, a false affidavit for an involuntary commitment proceeding on or about, February 10, 2014.

**VERIFICATION**

Signed this 12<sup>th</sup> day of October 2021, 6 Rabi' I 1443 A.H. under penalty of perjury that the statements and facts contained herein are true and correct to the best of my knowledge and belief as to these matters.

 El

I Am: Regina M. Hunter El  
All Rights Reserved  
A Natural Person, In Full Life, In Propria Persona, Sui Juris

**PROOF OF SERVICE**

I, Regina M. Hunter El, certify that I served a copy of this Ex-Parte Motion for Preliminary Injunction and Affirmation of Efforts to Confer with Opposing Party on Elijah Hunter, the S.C. Supreme Court, the S.C. Court of Appeals, Sumter County Court of Common Pleas, and the Sumter County Magistrate Court by depositing a copy of the same with the United States Postal Service, with first class mail postage, to the parties in the attached service list.

Executed this 12<sup>th</sup> day of October 2021 C.E., 6 Rabi' I 1443A.H.

Respectfully,



I Am: Regina M. Hunter El  
All Rights Reserved  
A Natural Person, In Full Life, In Propria Persona, Sui Juris

**RECEIVED**  
OCT 18 2021  
SC Court of Appeals

Regina M. Hunter El  
1165 Broad Street, #16  
Sumter, S.C. 29150

**Service List:**

Elijah Hunter  
3400 Hwy. 261 North  
Rembert, S.C. 29128

Attn: James C. Campbell, Clerk of Court  
Sumter County Court of Common Pleas  
Sumter County Judicial Center, third floor  
215 N. Harvin St  
Sumter, SC 29150  
Tel.: 803-436-2227  
Fax: 803-436-2223

William Mattison Gamble, Chief Magistrate Judge  
Sumter Magistrate Court  
190 E. Canal Street  
Post Office Box 1428  
Sumter, S.C. 29151-1428  
Tel. (803) 436-2280  
Fax: (803) 436-2789

Chief Justice Donald W. Beatty  
c/o Daniel E. Shearouse, Clerk of Court or  
c/o Brenda F. Shealy, Deputy Clerk of Court  
South Carolina Judicial Department  
The South Carolina Supreme Court  
1231 Gervais Street  
Columbia, SC 29201  
Tel. 803) 734-1080  
Fax: (803) 734-1499

Attn: Jenny Abbott Kitchings, Clerk and  
V. Claire Allen, Chief Deputy Clerk  
P.O. Box 11629  
Columbia, SC 29211  
1220 Senate Street  
Columbia, S.C. 29201  
Tel.: (803) 734-1890  
Fax: (803) 734-1839

Attn: Sheriff Anthony Dennis &  
Kathy Ward, General Counsel  
Sumter County Sheriff's Office  
1281 North Main Street  
Sumter, SC 29153  
Tel. (803) 436-2053, Fax: (803) 436-2054  
E-mail: [adennis@sumtercountysc.org](mailto:adennis@sumtercountysc.org)

Hon. Dale Atkinson, Probate Judge  
Sumter County Judicial Center  
215 N. Harvin St  
Sumter, S.C. 29150  
Phone: 803-436-2166  
Fax: 803-436-2407

The Honorable Henry McMaster, Governor  
State House  
1100 Gervais Street  
Columbia, SC 29201  
Tel. (803) 734-2100  
Fax: (803) 734-5167

The Honorable Alan Wilson  
c/o Barry Bernstein (Director of Constituent Services)  
P.O. Box 11549  
Columbia, S.C. 29211  
(803) 737-3953

Megina M. Hunter et  
1165 Broad St. #16  
Sumter, S.C. 29150



**RECEIVED**  
OCT 18 2021  
SC Court of Appeals

Attn: Jenny Abbott Kitchings, Clerk  
V. Claire Allen, Chief Deputy Clerk  
P. O. Box 11629  
Columbia, S.C. 29211