

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

MAR 10 2022

SC Court of Appeals

APPEAL FROM JASPER COUNTY

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

Appellate Case No. 2018-002186

First Team Hyundai, LLC dba Hilton Head Hyundai, Respondent
V.
Gregory S. Hackney, Appellant

Reply to Motion to Dismiss

I am a United States Citizen, Drivers License Number 058185497 and Passport Number 041139798.

Still Pondering how I was not allowed to present my case to a jury of my peers but found Guilty at a 40 minute hearing by a singular local Judge; noted the same Judge Mullen who denied Plaintiff Motion for Temporary Restraining Order and/or Preliminary Injunction thus allowed me to continue my freedom of speech in front of Hilton Head Hyundai. Understandably, glad my case is in the Appellant Court and not in a local Jasper County Court.

As such, I am dumbfounded counsel for Hilton Head Hyundai appears so be playing the same strategy to dismiss - force hand of court prior court trial - ruling.

I was preparing for my Jury of my Peers Trial in August 2018 and suddenly the Motion for Partial Summary Judgement was filed August 23, 2018. During a hearing on ADMITTED ITEMS on September 2nd, 2018 Judge Mullen told me there would be a hearing on the Motion For Summary Judgement on October 31st, 2018.

This date was Less than 30 days from Brad Martin Filing the Motion for a Summary Judgement.

How can a Defendant have this limited time prepare for a hearing with many witnesses to be called upon to testify including subpoena if necessary included at Trial. Beginning of an unfair process that has included not enough time to prepare for the Hearing, suddenly missing significant documents resulting in an order to remove from Record of Appeal. At present a Video perhaps now missing that **I personally handed to the Judge.**

Exhibit A -

As the court reviews Exhibit A, I was trying to confirm the court date through the Public Index but no confirmation of date. An email to opposing counsel when it was first rescheduled on October 11th, 2022 with another judge. (Somehow now stricken from the record)

It was then moved to a final date, confirmed by an email on September 18th, 2018 from Clerk of Court Margaret Bostlick. The date = October 31, 2018, the date confirmed just 43 days prior to hearing Date; clearly not enough time to prepare with the listed Interrogatories and Admitted filings I had already submitted.

Exhibit B

Record of Appeal Pages 462 - 465 Record of Appeal

Through June 6th, 2018 I was attempting to contact Jasper Count Police and get written testimony for trial and would have used in Summary Judgement Hearing but after 17 calls and written letters ZERO Response.

Noted: Not given enough time to prepare for Hearing, Send Subpoena's for hearing on October 31, 2018.

Exhibit C: Interrogatories 2
Record of Appeal Pages 603 and 604

As written #2 over 29 persons to be served a subpoena, to appear at Trial.

Noted: Not given enough time to prepare for Hearing on October 31, 2018.

Point of Reference

The Respondents Counsel noted 18 Motions for Extensions, Defiance in Filing The Record of Appeal. Amusing statement as I have filed over 2,000 Documents including the Record of Appeal 650 pages TWICE.

I demonstrated the Opposing Counsel and Courts rush to a Partial Summary Judgement Trial prohibiting me from properly preparing for the hearing.

During this time I was careful to include many important documents that suddenly did not appear in the filed documents. The Appellant Court is providing a professional courtesy allowing time to complete accurate Filings in their ordered legal time frame. Noting each of the 18 motions for Extension is approved by the court.

The Comment, case is costly and 3 years old? Not sure what course in Law School teaches cost and time in a court case is more critical than proper time to get it right. Motions for extension is not a delay strategy, but effort to unsure the rush for judgement in the lower does not happen in the Appellant Court.

Exhibit C Point of Reference:
Filed Record of Appeal Page 602

INTERROGATORIES

List of all documents, photographs, plats sketches or other Documents on possession that relate to the claims in this case, and that you plan to introduce at trial

#6 I will request to the court to allow Jurors to leave the court room and field trip to review the Wall-Mart Parking lot to get an understanding where my car was parked in relation to the video as it relates to the Peacock Auto Mall Security Person driving in front of me as per Harassment, intimidation both of which are unprofessional and unethical.

#7 Wal-Mart Video obtained by Jasper County Sheriffs Office

Exhibit C Record of Appeal Page 604 #29

I planned on calling the Driver of the Auto Mall Security Guard who Drove from their property to Wal-Mart Parking lot where my car was parked. This resulted in the referenced Victim Identification Report filled against Hilton Head Hyundai. Noting I was a VICTIM.

Point of Reference.

In the Motion to Dismiss, it states the Wal-Mart Video was not included in the Designation of Matter but as noted above and included in the Final Record of Appeal = Interrogatories. As stated above Interrogatories was included in Record Of Appeal a such The Wal-Mart Video should be included as part of the Record Of Appeal.

As such, in each of the 2 orders to exclude certain documents, Interrogatories was not defined excluded in the Ruling.

Point of Reference

Respondent's Motion to Reply to Appellant's response to its motion and memorandum for correction of the record of appeal.

Document not Presented to the Lower Court in the Defendant's Exhibit 1 Rule (210)(c) opposing counsels filing reads as follows
Documents not presented to lower court, removed from Record of Appeal

- a. Jasper County Sheriff's office Summary Judgement (R, 279-280)
- b. Jasper County Victim Notification Information Form
- c. April 2, 2018 note from Scott Henthorn
- d. Order Denying Plaintiff Motion for Temporary Restraining Order and/or Preliminary Injunction

The Record of Appeal filed complies with all Court orders referencing the Opposing Counsels Motions. In the Motion to Dismiss Opposing Counsel attempt to link the Victim Notification Information form and my request for the Wal-Mart Video.

One is a Video
One is a form-Document

The Wal-Mart Video shows their security person following me in their security vehicle to Wall-Mart where my car was parked. This action resulted in Jasper County Sheriff's office issuing a Victim Notification Information Form.

If the court read all opposing counsel motions to delete items from Record of Appeal, there is not one statement regarding the Wal-Mart video not to be included.

My Motion to amend the Record of Appeal upon confirmation the Video will be included was just as stated. I assumed the Video was forwarded to Appellant Court as I did hand it directly to Judge Mullens with a bound copy Response to the Request for Partial Summary Judgement.

Perhaps Opposing Counsel was distracted when this happened as prior my Hearing on October 31, 2018 Judge Mullen's dog was running around the court room. Judge Mullen's finally handled the dog and as she greeted me on the court room floor shaking my hand with her dog in the other. An example of the unprofessional behavior prior such a serious manner that clearly lays a path how many important documents and possibly important Video suddenly does not make it into filing as such can be used in my Appellant Case. Disgraceful to the American Court System.

I have adhered to both Orders related to Record of Appeal Rule 210c, SCACR: Numbered Pages, Exhibits added and in alphabetical order, removed documents that somehow were omitted in the lower, added documents that were missing per opposing Counsel and formatted according to the rules. Provided a bound copy to Respondent, Bound Copy to Court including non bonded copy allowing the documents to be scanned.

Respondents motion to Dismiss is just a deflection to my motion to include the Wal-Mart Video. I have filed the Ordered Record of Appeal and simply asked the court limited time to inquire by visiting the lower court and Judge Mullen to insure the Video is included in my Record of Appeal.

My previous attempts calling, email and mailing lower court for information on missing Documents fell on Deaf ears as ZERO Response. On this attempt I will drive to Jasper County Court and personally visit Judge Mullen. It is a simple ask,

The Respondents inaccurate and unethical attempt to tie into Previous Orders Referencing Wal-Mart Video can be confirmed when reading his motion and the resulting order.

I provided factual evidence through documents in the Record if Appeal delay is not a strategy;

I appreciate your patience and understanding Self-Represented and do not have a Law Staff.

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



Greg Hackney

MARCH 9TH 2022
Date

August 23rd, 2022 Motion for Summary Judgement Filed

On Sep 10, 2018, at 3:20 PM, Peggy McComb <pmccomb@bnmlaw.com> wrote:

Ms. Bostick,

Have you received a response from Judge Mullen's law clerk at to scheduling this motion hearing before her on September 21st? We understand that she will be in Beaufort County that week.

Thank you for your assistance.

Peggy McComb

Legal Assistant

Bradford Neal Martin & Associates, PA

Post Office Box 10410 (29603)

201 West McBee Avenue, Suite 302

Greenville, South Carolina (29601)

864.552.9990

864.552.9992 fax

pmccomb@bnmlaw.com

www.bnmlaw.com

From: Greg Hackney <floridaexperiment@icloud.com>

Sent: Tuesday, September 11, 2018 6:55 AM

To: Peggy McComb; Margaret Bostick

Subject: Re: Motion for Summary Judgment hearing - HH Hyundai v. Greg Hackney CA No. 2017-CP-27-0386

It appears to be scheduled on 10/11 per sccourts.org

Greg Hackney

EXHIBIT A

**Magaret Bostilck
September 18th, 2018**

Motion for Summary Judgement hearing – HH Hyundai v Greg Hackney

To Greg Hackney, Peggy McComb

Good Morning

Please be advised that this motion has been scheduled to be heard in Jasper County on 10/31/18 at 11:00 am. The Hon. Carmen Mullen will be presiding. Please accept this as notice of hearing.

Thanks

EXHIBIT A

Greg Hackney
30 Old Vermont Place
Sandy Springs, Georgia 30328
678-855-2975

June 1st, 2018

Sheriff Chris Malphrus
12008 North Jacob Smart Blvd.
Richland, South Carolina 29936

**RE: 17 calls - 8 visits = Zero Response
Jasper County Sheriff Office**

Sheriff Malphrus:

As noted, I stopped by your office today to have a discussion regarding the data below. I dropped off a binder on April 27th, 2018 and have not heard any feedback to resolve my issues.

I gave two binders to Jasper County Sheriff Lt. Smith who confirmed on May 10th, 2018 that he did deliver the two binders to you and Deputy Chief Morris.

Since April 27th, 2018 I have left 17 messages and visited your office 8 plus times; the only response I received was a voicemail from Deputy Chief Morris on May 14th, 2018; If I wanted to discuss any issues with the Jasper County Sheriff's Office to contact Lt. Smith. As such, I have left him numerous messages and have had no response.

Please advise accordingly, I am asking for documents to be filed, explanations and follow up on existing cases; explanation and clarification on victim notification and identification forms and other charges be filed against Hilton Head Hyundai.

The binders were dropped off over 1 month ago and I have been unable to schedule a meeting to complete the task per the data in the binder.

Attempts to schedule a meeting!

May 2018 Calls: 10th (2), 11th (4), 14th, 15th, 16th, 17th, 18th, 21st, 22nd, 23rd, 25th (2), 29th, 30th


Please have Lt. Smith or another person on your staff call me to schedule a meeting! I will continue my efforts until this issues is resolved.

Respectively,

Greg Hackney

Enclosure:

Chris Matthews



**JASPER COUNTY
SHERIFF'S OFFICE**
P.O. Box 986, Ridgeland, SC 29936
Phone: 843-726-7777
Fax: 843-726-7778
Non-Emergency: 843-726-7519 24 hr.

Case# _____
Inv.# _____
Officer _____
Date _____

U.S. Postal Service
CERTIFIED MAIL RECEIPT

OFFICIAL USE

0463 06

POSTAGE AND FEE \$0.71

POSTAGE AND FEE \$7.12

04/07/2008

NET 02'S 0000 DEFD 2102

463

312

EXHIBIT B



A1 of 1

Account Number: 745387054
 Bill Period: May 06 - Jun 07, 2018

Call Details - (878) 855-2975 - Voice

Call time displays as Central Time (CT) or local time depending on how and where the call was made.

Day	AI	To / From	Destination	Rate	Time	Cost
May 08	08:58 am	(878) 361-0061	Incoming	NW/AU	04:00	-
May 10	03:20 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	-
	03:22 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	-
May 11	05:18 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
	05:27 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
	05:28 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
	05:29 am	(800) 227-4825	Toll Free Call	AU	02:00	-
	05:35 pm	(877) 247-2944	Toll Free Call	AU	01:00	-
May 13	02:55 pm	(770) 575-1185	ATLANTA NW, GA	NW/AU	01:00	-
	02:58 pm	(702) 301-8829	JASPER, GA	NW/AU	02:00	-
	03:50 pm	(770) 575-1185	ATLANTA NW, GA	NW/AU	03:00	-
May 14	04:50 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
May 15	03:18 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	-
May 18	12:23 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	-
	01:22 pm	(878) 361-0061	Incoming	AU	06:00	-
May 17	05:26 am	(843) 728-7777	RIDGELAND, SC	AU	03:00	-
May 18	12:54 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	-
	01:53 pm	(800) 888-0436	COLUMBIA, SC	AU	01:00	-
	01:58 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
May 20	06:45 pm	(878) 361-0061	ATLANTA NE, GA	NW/AU	07:00	-
May 21	10:18 am	(800) 888-0000	GREENVILLE, SC	AU	04:00	-
	12:52 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
May 22	05:12 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
	10:18 am	(800) 734-1880	COLUMBIA, SC	AU	01:00	-
	10:18 am	(800) 888-0000	COLUMBIA, SC	AU	02:00	-
	01:02 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
May 23	03:01 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	-
May 24	02:43 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	-
	02:54 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	-
	03:28 pm	(800) 734-1880	COLUMBIA, SC	AU	20:00	-
May 25	11:54 am	(878) 361-0061	ATLANTA NE, GA	AU	01:00	-
	11:28 am	(770) 575-1185	ATLANTA NW, GA	AU	14:00	-
	11:59 am	(878) 361-0061	ATLANTA NE, GA	AU	06:00	-
	11:55 am	(878) 361-0061	Incoming	AU	01:00	-
May 26	02:00 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	-
	02:08 pm	(800) 888-0000	COLUMBIA, SC	AU	02:00	-
Jun 02	07:24 am	(878) 361-0061	ATLANTA NE, GA	NW/AU	03:00	-
	07:27 am	(878) 361-0061	Incoming	NW/AU	14:00	-
Jun 04	02:48 pm	(800) 227-4825	Toll Free Call	AU	02:00	-
	03:49 pm	(800) 227-4825	Toll Free Call	AU	05:00	-
	04:53 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	-
	07:12 pm	(800) 227-4825	Toll Free Call	AU	03:00	-
Jun 05	03:58 pm	(800) 734-1880	COLUMBIA, SC	AU	01:00	-
Jun 06	12:23 pm	(843) 728-7777	RIDGELAND, SC	AU	06:00	-
	07:21 pm	(878) 361-0061	ATLANTA NE, GA	AU	10:00	-
	07:21 pm	(878) 361-0061	Incoming	AU	01:00	-
	07:24 pm	(878) 361-0061	ATLANTA NE, GA	AU	02:00	-
	07:48 pm	(878) 361-0061	ATLANTA NE, GA	AU	01:00	-
	07:41 pm	(702) 301-8829	JASPER, GA	AU	01:00	-

Rate Type
 AU Anytime Plan Usage
 NW Night and Weekends



Call Details - (878) 855-2975 - Voice

Call time displays as Central Time (CT) or local time depending on how and where the call was made.

On	At	To / From	Destination	Rate	Min	Cost
May 08	04:58 am	(878) 861-0081	Incoming	NW/AU	04:00	
May 10	03:20 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	
	03:22 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	
May 11	09:18 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	
	09:37 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	
	09:58 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	
	09:23 am	(800) 227-4825	Toll Free Call	AU	02:00	
	05:09 pm	(877) 217-2184	Toll Free Call	AU	01:00	
May 19	02:55 pm	(770) 575-1185	ATLANTA NW, GA	NW/AU	01:00	
	03:56 pm	(706) 901-8028	JASPER, GA	NW/AU	02:00	
	03:50 pm	(770) 575-1185	ATLANTA NW, GA	NW/AU	06:00	
May 14	04:50 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	
May 15	03:18 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	
May 18	12:23 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	
	01:02 pm	(878) 861-0081	Incoming	AU	06:00	
May 17	09:58 am	(843) 728-7777	RIDGELAND, SC	AU	03:00	
May 18	12:54 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	
	01:58 pm	(803) 886-0488	COLUMBIA, SC	AU	01:00	
	01:58 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	
May 20	06:43 pm	(878) 861-0081	ATLANTA NE, GA	NW/AU	07:00	
May 21	10:18 am	(864) 592-0288	GREENVILLE, SC	AU	04:00	
	12:57 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	
May 22	08:12 am	(843) 728-7777	RIDGELAND, SC	AU	01:00	
	10:18 am	(803) 734-5043	COLUMBIA, SC	AU	01:00	
	10:18 am	(803) 886-0488	COLUMBIA, SC	AU	06:00	
	01:02 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	
May 23	03:22 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	
May 25	02:53 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	
	02:54 pm	(843) 728-7777	RIDGELAND, SC	AU	01:00	
	03:28 pm	(803) 734-1880	COLUMBIA, SC	AU	20:00	
May 28	11:24 am	(878) 861-0081	ATLANTA NE, GA	AU	01:00	
	11:38 am	(770) 575-1185	ATLANTA NW, GA	AU	14:00	
	11:50 am	(878) 861-0081	ATLANTA NE, GA	AU	05:00	
	11:55 pm	(878) 861-0081	Incoming	AU	03:00	
May 29	02:05 pm	(843) 728-7777	RIDGELAND, SC	AU	02:00	
	02:06 pm	(803) 886-0488	COLUMBIA, SC	AU	03:00	
Jun 02	07:24 am	(878) 861-0081	ATLANTA NE, GA	NW/AU	03:00	
	07:27 am	(878) 861-0081	Incoming	NW/AU	14:00	
Jun 04	02:40 pm	(800) 227-4825	Toll Free Call	AU	03:00	
	03:49 pm	(800) 227-4825	Toll Free Call	AU	06:00	
	04:03 pm	(843) 728-7777	RIDGELAND, SC	AU	03:00	
	07:12 pm	(800) 227-4825	Toll Free Call	AU	03:00	
Jun 05	03:59 pm	(803) 734-5043	COLUMBIA, SC	AU	01:00	
Jun 06	12:38 pm	(843) 728-7777	RIDGELAND, SC	AU	05:00	
	07:21 pm	(878) 861-0081	ATLANTA NE, GA	AU	16:00	
	07:21 pm	(878) 861-0081	Incoming	AU	01:00	
	07:34 pm	(878) 861-0081	ATLANTA NE, GA	AU	02:00	
	07:40 pm	(878) 861-0081	ATLANTA NE, GA	AU	01:00	
	07:41 pm	(706) 901-8028	JASPER, GA	AU	01:00	

Rate Type
 AU Anytime/Week Days
 NW Night and Weekends

INTERROGATORIES

2. Set forth a list of documents, photographs, plats sketches or other prepared Documents in Your Possession that relate to the claims in this case, and that You plan to introduce at trial.

- HWY 278 – Wal-Mart Photograph – diagram of area I am doing my activity including the areas my signs were stolen, Hilton Head Hyundai employees cursed as they approached me location were brief case and keys were stolen, median were I was ticketed for No trespassing Hardeeville Police Officer present and location of their Security vehicle as it mirrored my daily as I did my activity.
- Excel Spreadsheet – Timeline etc. (Pending)
- Automobile Association Documents related to Auto Dealership Standards. (Pending)
- I will request to court to allow the Jurors to leave the court room and field trip to review my vehicle to get an understanding of the issues I reviewed upon its return.
- I will request the court to allow the Jurors to leave the court room and field trip to review area I did my activity so they can understand the areas my signs, keys and brief case were stolen. Also to understand the daily peering from their security vehicle including peering me to the Wal-Mart parking lot.
- I will request to the court to allow the Jurors to leave the court room and field trip to review the Wal-Mart parking lot to get an understanding where my car was parked in relation to the video as it relates to Peacock Auto Mall Security person driving in front of me as per harassment, intimidation both which are unprofessional and unethical.
- Wal-Mart Video obtained by the Jasper County Sheriff's Office.
- 911 Call, my request for assistance to recover my vehicle from Hilton Head Hyundai after paying my balance and curing it as such

2. For each person known to You to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statement or document taken from such witness.

1. Warren Peacock, (Assumed Owner) - (R. 5, 6, 7, 8, 9, 10, 11, 15, 16, 17, 18, 19, 20, 21, 25-27, 28-33, 40-42, 43, 44-149, 157)
2. Principle Owners, requested in Discovery. - (R. 5, 6, 7, 8, 11, 15, 16, 17, 18, 19, 20, 21, 25-27, 28-33, 40-42, 43, 44-149, 157)
3. John Lyons, Chief Financial Officer - (R. 1-3, 4, 5, 6, 7, 11, 15, 16, 17, 18, 19, 20, 21, 22, 77-97, 43, 44-149, 157)
4. Michael Butt, New Car Sales Manager. - (R. 5, 11, 14, 15, 17, 54-57)
5. Matt Houghton, not Sure of Position. - (R. 8, 18, 21)
6. General Manager, requested name in Discovery. - (R. 5, 6, 14, 15, 16, 17)
7. Jessica (Service Mgr.), requested in Discovery. - (R. 1-3, 4, 5, 6, 7, 8, 11, 14, 15, 16, 17, 44-53, 54-67)
8. Mickey Harvester, Second Hilton Head Service Person. - (R. 1-3, 4, 5, 6, 14, 15, 16, 17, 54-67)
9. Buck Adele, (R. 1-7, 8, 9, 10, 11, 62-65)
10. Hardeeville Police Officer Francis Lemus, - (R. 8, 15, 16, 17, 19, 20, 73-77, 98-104)
11. Scot Hanthorn, O.C. Welch person who witnessed my brief case being stolen. - (R. 139-146)
12. Sheriff Chris Malphrus, - (R. 7, 8, 9, 10, 11, 12, 14, 13, 16, 17, 19, 19, 20, 21, 22, 23, 24, 28-33, 43, 44-149)
13. David Tedder, Jasper County Legal Counsel, - (R. 7, 8, 9, 15, 16, 17, 28-30, 40-42, 44-149)
14. Chief Morris, Jasper County Sheriff, - (R. 7, 8, 10, 21, 22, 84, 44-149, ~~105-131~~)
15. Lt. Smith, Jasper Co. Sheriff, - (R. 7, 8, 9, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 54-67, 105-131, 132-138, 139-146)
16. Jasper County Sheriff Deputy Hunnicutt, - (R. 7, 8, 9, 15, 19, 54-67, 73-77, 98-104)
17. Jasper County Sheriff Deputy Hartley Umphries(?), - (R. 8, 9, 18, 19, 68-72, 132-138)
18. Jasper County Sheriff Deputy Dodson, - (R. 7, 8, 9, 15, 16, 17, 19, 20, 54-67)
19. Lt. Bryd, Jasper County Sheriff, - (R. 28-33, 121-122, 62-63)
20. Front Desk Receptionist, Jasper County Sheriff's Office, - (R. 9, 20-24, 77-97, 28-30, 105-131)
21. Hertz Rental Car Personnel, court date availability. - (R. 2, 7, 8, 9, 16, 17, 10, 158-162, 54-67, 62-63)

22. S.C. Auto Dealership Associations, court date availability, - (R. 1-27,43,44-149,157)
 23. Check Verification Machine Liaisons-Client relationships, requested in Discovery. - (R. 7,8,16,17)
 24. H. H. Hyundai – Hyundai Corp. Liaison, requested name in discovery. - (R. 1-27,77-87,43,44-149,157)
 25. Two 17 Year old Boys, Requested name in Discovery. - (R. 21)
 26. SLED, Capt. Thomas Robertson, - (R. 7,8,9,10,11,12,14,15,16,17,18,19,21,22,23,24,28-30,36-39,44-149)
 27. Unidentified Sheriff Deputy, Requested name to Sheriff Office and No Response. - (R. 73-76)
 28. Daniel Scott, Wal-Mart Security Person, retrieved the Video for Sheriff's Office - (R. 105-131)
 29. Security Person who drove the vehicle, not Identified - Victim Identification Report.
(R. 20,21,22,77-97,105-131)
3. Identify all service or repair work You have had performed or Did yourself on the 2012 Hyundai Sonata prior any service or repair by Plaintiff, including the date of service or repair, the name of the Person or business that performed the service, and the nature of the service repair performed.
- Repaired damages related to accident – tractor trailer rear ended vehicle.
Johnny Ha, Complete Auto Repair LLC, 166 Forest Parkway Lake City Ga. 30260, 678-927-9039
 - Right rear "Small Window"
Remote lock and key would not work to open car, my vehicle auto locked itself when I was in Florida on business and could not wait hours for a locksmith; I broke the windshield to gain access to my vehicle. Upon returning to Atlanta I removed the window, purchased a new one and with the assistance of my father we installed it.
4. Identify how your car was damaged prior to the May 29th, 2017 accident that resulted in the following damages: hood, right fender, front bumper cover, cracked grill and the scratch on the right front door panel.
- Hood: Winter 2016, Big Canoe, Georgia – I was attempting to drive to my parent's house in the mountains and during a Snow Storm I could not manage a steep hill and turn resulting in the car sliding into a ditch. I had to walk to my parent's house and have a towing company pulled the car from the ditch.
 - Right Fender and front bumper cover and cracked grill: Fall 2015, Sandy Springs Georgia I was driving and moved into the right lane and did not see a sports utility vehicle moving past me as such we collided side to side. Since the other vehicle was higher there was minimal damage to their vehicle but it was my fault. The young lady who was driving the vehicle did not want to call the police or file a claim, it appeared she did not have insurance or issues with calling the police so we agreed to handle the damages separately.

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas
The Honorable Carmen T. Mullen, 14th Circuit Court Judge
Trial Court No 2017CP2700386

Appellate Case No. 2018-002186

First Team Hyundai, LLC dba Hilton Head Hyundai, Respondent

V.

Gregory S. Hackney, Appellant

Proof Of Service
Reply to Motion to Dismiss

Certification I have served the Respondent Reply to for Motion to Dismiss by Depositing a copy in the US Mail, postage prepaid on March 8th, 2022. Addressed to Brad Martin, Post Office Box 10410, South Carolina 29603.

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



Greg Hackney

March 9th, 2022
Date

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