

May 3, 2022

"Attn" Elizabeth Carter **RECEIVED**

May 03 2022

SC Court of Appeals

The STATE OF SOUTH CAROLINA

In the Court of Appeals

Appeal FROM Cherokee County  
Court of Common Pleas

J. Deham Cole, Circuit Court Judge

Case No. 2021-000050

Bobby Dean Littlejohn Prose vs

Appellant

Tech One futo

Respondent

Motion

ASK The Court of Appeal To Include All of My  
Designation of Matter (Proofs) Pictures, written statements,  
Documents <sup>(ETC)</sup> that I Emailed on April 28, 2022 To My

A Petition For the Court To Reinstate

B For court To Rehear

C Final Brief

D Designation of Matter: From March 27, 2022

E I Bobby Dean Littlejohn <sup>(Prose)</sup> ask the any future FILING fees be  
waved. <sup>(1) (written statement)</sup>

F That the Date on my <sup>About Upstate Body Shop</sup>  
Be corrected to 12-2-2019 the correct Date. I made a  
mistake and put 12-2019 (I include a copy from Upstate  
Body Shop) From April 28, 2022 (Designation of Matter Proofs)  
<sup>(Appellant)</sup> <sup>From my written statement</sup>

F Bobby Dean Littlejohn have Included my \$50.00 Filing Fee

Bobby Dean Littlejohn

BOBBY DEAN Littlejohn  
109 Vermont Drive  
Laffrey SC 29341  
864-812-1176

May 3, 2022

"Attn" Elizabeth Carter

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

May 03 2022

SC Court of Appeals

Appeal From Cherokee County  
Court of Common Pleas

J. Decham Cole, Circuit Judge

Case No. 2021-000050

Bobby Dean Littlejohn Pro Se vs Appellant  
Tech One Auto Respondent

PROOF OF SERVICE

I certify that I Bobby Dean Littlejohn (Appellant) have Served  
Motion <sup>(copy)</sup> To Tech One Auto / Scott Lawhorn <sup>(Respondent)</sup> By E. Mail TO  
TechOne@techoneauto.net on May 3, 2022

I Included

① Documents from Update Body Shop Dated 12-2-2019 AND 4-28-2022

② Picture of Filing Fee Money Order Dated May 3, 2022  
FOR MOTION

cc South Carolina Court of Appeals  
ctaffilings@SCCOURTS.ORG

E. Mailed TO BOTH and  
cc Joemeil Littlejohn  
Joe meil Z18@gmail.com

Bobby Dean Littlejohn  
BOBBY DEAN LITTLEJOHN  
109 Vermont Drive  
Gaffney SC 29341  
864-812-1176

Date May 3, 2022

RECEIVED

May 03 2022

SC Court of Appeals

Page 1

The State of South Carolina  
In the Court of Appeals  
Appeal From CHEROKEE County  
Court of Common Pleas  
J. Durham Cole, Circuit Court Judge

Case No. 2021-000050

Bobby Dean Littlejohn vs Appellant  
Tech One Autos Respondent

Designation of Matter (Proof)

① Pictures  
② Documents  
③ Written statements from James Byers (previous Dodge Ram 1500 Truck owner and one of my witnesses) Isaac Bridges who set up and put the deal together for me to purchase my Dodge Ram 1500 Truck from James Byers (also one of my witnesses during my court date on August 6, 2020 in the Magistrate's Court, County of CHEROKEE STATE OF SOUTH Carolina Robert B. Howell, Cherokee County Magistrate Seventh Judicial Circuit) My daughter Anquasia S. Poole.

Bobby Dean Littlejohn  
109 VERMONT DRIVE  
GAFFNEY SC 29341  
864-812-1176  
bobbyd.littlejohn@gmail.com

Date May 3, 2022

RECEIVED

May 03 2022

SC Court of Appeals

The STATE OF South Carolina  
In the Court of Appeals

Page 2

Appeal From Cherokee County  
Court of Common Pleas

J. Durham Cole, Circuit Court Judge

Case No: 2021-000050

Bobby Dean Sealeigh vs - Appellant  
Tech One Autos Respondent

Designation of Matter (Proof)

④ A document(s) from Upstate Body Shop. first one dated 12-2-19 - second dated 4-28-2022 both are the same exact document. I had circled the Power Driver Seat on the one dated 12-2-19 to show that My Dodge Ram 1500 Truck VIN Number: 1D7HA182365688364 Did Have Power Driver Seat whenever I purchased My Dodge Ram 1500 Truck from James Byers in July of 2019, My Dodge Ram 1500 Truck Had Power Driver Seat whenever I carried it to Tech One Autos / Scott Lawhorn, But DIDN'T whenever I picked my Dodge Ram 1500 Truck up From Tech One Autos / Scott Lawhorn on the same day of a Dimple Repair Job.

Bobby Dean Sealeigh  
Bobby DEAN L. Hejath  
109 Vermont Drive  
Coffey SC 29341  
864-812-1176

Date: 12/ 2/2019 02:16 PM  
 Estimate ID: 3715  
 Estimate Version: 0  
 Preliminary  
 Profile ID: Mitchell

## UPSTATE BODY SHOP

1018 NORTH LOGAN STREET, GAFFNEY, SC 29341  
 (864) 902-1933  
 Fax: (864) 902-1931

Damage Assessed By: KENNY MANRY  
 Classification: None

Deductible: UNKNOWN

Mitchell Service: 913530

Description: 2006 Dodge Pickup R1500 Laramie  
 Body Style: 4D PkpwCrw 6' Bed 140" WB  
 VIN: 1D7HA18236S688364  
 OEM/ALT: A  
 Options: PASSENGER AIRBAG, ~~POWER DRIVER SEAT~~, POWER LOCK, POWER WINDOW, POWER STEERING  
 AIR CONDITION, CRUISE CONTROL, TILT STEERING COLUMN, AM/FM STEREO, DRIVER AIRBAG  
 HEATED EXTERIOR MIRROR, REAR (DUAL-ZONE) AC, LEATHER SEAT, ANTI-LOCK BRAKE SYS.  
 FOG LIGHTS, ADJUSTABLE FOOT PEDALS, ANTI-THEFT SYSTEM, LEATHER STEERING WHEEL  
 SATELLITE RADIO, CD PLAYER, CHROME WHEELS, POWER ADJUSTABLE EXTERIOR MIRROR  
 GENUINE WOOD TRIM, TRIP COMPUTER, UNIVERSAL GARAGE DOOR OPENER  
 INTERIOR AUTOMATIC DAY/NIGHT OR ELECTROCHROMATIC MIRROR, KEYLESS ENTRY SYSTEM  
 REAR BENCH SEAT

Drive Train: 5.7L [n] 8 Cyl 2WD  
 Search Code: B689363

Line Item	Entry Number	Labor Type	Operation	Line Item Description	Part Type/ Part Number	Dollar Amount	Labor Units
-----------	--------------	------------	-----------	-----------------------	---------------------------	---------------	-------------

### Estimate Totals

		Add'l Labor Amount	Sublet Amount	Totals			Amount
I. Labor Subtotals	Units	Rate			II. Part Replacement Summary		Amount
Labor Summary	0.0			0.00	Total Replacement Parts Amount		0.00
III. Additional Costs				Amount	IV. Adjustments		Amount
Total Additional Costs				0.00	Customer Responsibility		0.00

ESTIMATE RECALL NUMBER: 12/02/2019 14:12:48 3715

Mitchell Data Version: OEM: OCT\_19\_V

MAPP: OCT\_19\_V

Software Version: 7.1.238

Copyright (C) 1994 - 2019 Mitchell International  
 All Rights Reserved

Date: 4/28/2022 02:54 PM  
 Estimate ID: 6011  
 Estimate Version: 0  
 Preliminary  
 Profile ID: Mitchell

## UPSTATE BODY SHOP

1018 NORTH LOGAN STREET, GAFFNEY, SC 29341  
 (864) 902-1933  
 Fax: (864) 902-1931

Damage Assessed By: KENNY MANRY  
 Classification: None

Deductible: UNKNOWN

Mitchell Service: 913530

Description: 2006 Dodge Pickup R1500 Laramie  
 Body Style: 4D PkUpCrw 6' Bed 140" WB  
 VIN: 1D7HA18236S688364  
 OEM/ALT: A  
 Options: PASSENGER AIRBAG, POWER DRIVER SEAT, POWER LOCK, POWER WINDOW, POWER STEERING  
 AIR CONDITION, CRUISE CONTROL, TILT STEERING COLUMN, AM/FM STEREO, DRIVER AIRBAG  
 HEATED EXTERIOR MIRROR, REAR (DUAL-ZONE) AC, LEATHER SEAT, ANTI-LOCK BRAKE SYS.  
 FOG LIGHTS, ADJUSTABLE FOOT PEDALS, ANTI-THEFT SYSTEM, LEATHER STEERING WHEEL  
 SATELLITE RADIO, CD PLAYER, CHROME WHEELS, POWER ADJUSTABLE EXTERIOR MIRROR  
 GENUINE WOOD TRIM, TRIP COMPUTER, UNIVERSAL GARAGE DOOR OPENER  
 INTERIOR AUTOMATIC DAY/NIGHT OR ELECTROCHROMATIC MIRROR, KEYLESS ENTRY SYSTEM  
 REAR BENCH SEAT

Drive Train: 5.7L Inj 8 Cyl 2WD  
 Search Code: B689363

Line Item	Entry Number	Labor Type	Operation	Line Item Description	Part Type/ Part Number	Dollar Amount	Labor Units
-----------	--------------	------------	-----------	-----------------------	---------------------------	---------------	-------------

### Estimate Totals

I. Labor Subtotals	<u>Units</u>	<u>Rate</u>	<u>Add'l Labor Amount</u>	<u>Sublet Amount</u>	<u>Totals</u>	II. Part Replacement Summary	<u>Amount</u>
Labor Summary	0.0				0.00	Total Replacement Parts Amount	0.00
III. Additional Costs					<u>Amount</u>	IV. Adjustments	<u>Amount</u>
Total Additional Costs					0.00	Customer Responsibility	0.00

ESTIMATE RECALL NUMBER: 04/28/2022 14:53:13 6011

Mitchell Data Version: OEM: MAR\_22\_V

MAPP:MAR\_22\_V

Software Version: 7.1.242

Copyright (C) 1994 - 2022 Mitchell International  
 All Rights Reserved

STATE OF SOUTH CAROLINA )  
COUNTY OF CHEROKEE )  
Bobbie Littlejohn, )  
APPELLANT, )  
VS )  
Tech One Auto )  
RESPONDENT. )

---

IN THE COURT OF COMMON PLEAS  
020CP-110653

RETURN

IN THE MAGISTRATE'S COURT  
2020CV1110100688

BRANNON W. HOBBEE

2020 SEP 10 AM 11:38

FILED IN OFFICE OF  
CLERK OF COURT  
CHEROKEE COUNTY, S.C.

DATE OF HEARING: August 6, 2020  
TRIAL JUDGE: Robert B. Howell  
ATTORNEY FOR APPELLANT: Pro Se  
ATTORNEY FOR RESPONDENT: Pro Se

This matter came before the Court on August 6, 2020 pursuant to a Summons and Complaint filed by the Appellant. The Respondent filed a timely answer denying all allegations.

The Appellant testified: that he took his truck to the Respondent, who had done work for the Appellant in the past many times, to have some cosmetic repairs done to his truck. The Appellant further testified that the Respondent had damaged his truck by taking items off his truck and not replacing them (Chicago Bear Decals), completely changing out the trucks' interior and had put holes in the roof of the truck.

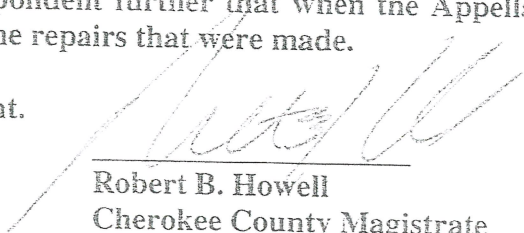
The Appellant further called five (5) witnesses that he had subpoenaed 1. Isaac Bridges, 2. Joe Littlejohn, 3. T. J. Haney, 4. Terry Haney, and 5. James Byers all of which testified that the interior of the Appellant's truck was different from when he first purchased the truck however none of them could testify to the fact that the changes to the interior or the damages were done by the Respondent. None of the witnesses were present when the Appellant picked up his truck from the Respondent and all witnesses testified that significant time had passed from when they first saw the truck to long after the repairs by the Respondent were completed.

The Appellant did not testify to any damages or put any exhibits into evidence.

The Respondent (Scott Lawhorn) testified that he nor his business did any damage to the Appellant's truck. The Respondent further that when the Appellant picked up his truck he was satisfied with the repairs that were made.

The Court found for the Respondent.

Gaffney, South Carolina  
September 10<sup>TH</sup>, 2020

  
Robert B. Howell  
Cherokee County Magistrate  
Seventh Judicial Circuit

**Date: March 23, 2020**

**To: Cherokee County Magistrate**

**Re: Civil Case Number 2020CV1110100688**

**From: Tech One Auto Repair/Scott Lawhorn**

I, Brian Scott Lawhorn, was served with a Complaint on March 5, 2020. My Answer is as follows: I deny that I am responsible at all because, in no way, did I damage the vehicle in question or remove any items from the vehicle that Bobby Littlejohn claims are missing. Here is my summary of events specific to this complaint:

**10/31/2019:**

- Bobby Littlejohn brought a 2006 Dodge Ram 1500 to my shop that morning around 9:30 – 10:00 as previously scheduled for repairs, specifically because it had a starting issue.
  - This was my first time ever working on this truck for Bobby.
  - Bobby stated that he had recently purchased this vehicle and that someone else had been trying to fix it. He feared that if the truck was cut off, it might not start back. Therefore, once at the shop, it was placed directly in a shop bay.
- The truck was checked and parts were ordered later that afternoon. During this time, the truck remained in a work bay. The parts were installed.
- Bobby Littlejohn was contacted near the end of the working day to pick up the repaired vehicle. He provided instructions to leave the vehicle outside and that he would pick it up after hours. I did this
- We finished working on this day between 6:15-6:30 and left for the day.

**Week of 11/04/19:**

- Bobby returned to shop:
  - He asked me if we had lights outside the shop. I answered “yes”. Both of my employees, Parker Lecroy and Dale Harris, later clarified that he meant “cameras” not lights and that Bobby had complained to them that something was missing out of his truck.
  - He later explained to me that someone had stolen his console. Together, we went to his truck.
    - The console was not missing. His console was in his truck.
    - He said that someone had stolen his console and replaced it, that the one in his truck now was cracked, was 2 different colors and was missing a cup holder and Chicago Bears decals that were stuck to the bottom of the console.
  - I discussed this with Bobby and explained that no one had removed/replaced his console.
  - Bobby told me that it was like “the one in a truck in your parking lot that didn’t have a tag on it”
  - Later that day, both of my employees explained to me that Bobby was referring to another Dodge Ram 1500 in my parking lot that belonged to another customer.
    - I actually had this truck at my shop for an extended period of time for major repairs on the engine. So, each time Bobby came back with a complaint, I used this truck as a reference because it was the same year, had the same interior and the same wear patterns consistent with a truck that is 13-14 years old.
  - After hearing this from my employees and knowing that I still had this truck at my shop, I was able to go look at this truck and realized that the interior in this truck was identical to the interior in Bobby’s truck. I also realized that the cup holder was located in the dash, not in the console.
  - After seeing this, I felt confident that Bobby was just confused about the location of the cup holder because the truck was new to him. I honestly thought that once I showed and explained this to him that this matter would be resolved.

THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT TO VIEW

WesternUnion/WU

WESTERN UNION FINANCIAL SERVICES INC. - ISSUER - Denver, Colorado

MONEY ORDER

Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

19-389817665

A 348709 D 050322  
1 1459 05  
193898176651 L 000015

\$ 50.00

PAY EXACTLY  
PAY TO THE  
ORDER OF

FIFTY DOLLARS AND NO CENTS

Case No: 2021-000050  
Morton

The South Carolina Court of Appeals

109 Vermont Drive  
Daffney SC 29341

PAYMENT FOR/ACCT. #

Jobby Dean Spivey  
PURCHASER'S SIGNATURE

⑆102000400⑆ 40193898176651⑈

MONEY ORDER RECEIPT - NON NEGOTIABLE

South Carolina Court of Appeals

You can now use cash to pay for millions of Amazon.com products through Paycode at participating Western Union Agent locations. Find out more at wu.com/amazon

ACT 348709 LUC 000015 DT 050322 \$50.00 50DOLLARS AND NO CENTS

Payable to:  
RETAIN THIS MONEY ORDER RECEIPT. IT MUST BE INCLUDED WITH ALL REFUND REQUESTS. BE SURE TO READ IMPORTANT INFORMATION BELOW AND ON BACK. For your own records, it is recommended that you make a photocopy of the completed Money Order before providing it to the receiver.  
PURCHASE AGREEMENT: You the purchaser agree that Western Union Financial Services Inc. (WUFSI) need not stop payment on, or replace, or refund a lost or stolen WUFSI Money Order unless (1) you fill in the face of the Money Order at the time of purchase, and (2) you report the loss or theft to Western Union Financial Services Inc. in writing immediately, and (3) You provide WUFSI with this original Money Order receipt issued by Western Union Financial Services Inc., Denver, Colorado. For customer service, call 1-800-999-9660.



LOAD THIS DIRECTION, THIS SIDE UP

Case No. 2021-000050  
Morton

LOAD THIS DIRECTION, THIS SIDE UP

PO Box  
11629  
Columbus SC  
29211