

**RECEIVED**

**May 23 2022**

**SC Court of Appeals**

**LETTER TO THE APPELLATE COURT CLERK  
RE-SUBMIT FILING A MOTION FOR ACTION TO BE TAKEN  
May 22, 2022**

**The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211**

**(The Honorable Patricia A. Howard  
Clerk, Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211)**

**RE: Charles R. Norris, Respondent v. Joe Clemons, Appellant  
Appellate Case No. 2021-001183**

Dear Ms. Kitchings (Ms. Howard),

I am re-submitting the enclosed motion from November 30, 2021, filed on December 3, 2021, for action to be taken against Mr. Charles Norris (Respondent) and his client Mrs. Peggy Pinnell for perjury under oath during trial on August 23 and 24, 2022 and Mr. Norris for falsifying paperwork, misrepresenting facts, and making false statements in court during trial. Because I have submitted this motion before, I am requesting to not have to pay a filing fee, however if a fee is required, please let me know and I will submit payment.

Thank you,

*Joe Clemons*

Joe Clemons Pro Se Litigant/Apologist for Appellant  
2202 Addidas St., Eutawville, South Carolina 29048  
(843) 753-7007

95148

**LETTER TO THE APPELLATE COURT CLERK  
FILING A MOTION FOR ACTION TO BE TAKEN**

**RECEIVED**

**NOVEMBER 30, 2021**

DEC 03 2021

SC Court of Appeals

**The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211**

**(The Honorable Patricia A. Howard  
Clerk, Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211)**

**RE: Charles R. Norris, Respondent V. Joe Clemons, Appellant  
Appellate Case No. 2021-001183**

Dear Ms. Kitchings (Ms. Howard)

Enclosed for filing is a motion for action to be taken, I'm asking the court of appeal to please consider taking action against Mr. Charles Norris (Respondent) and his client Mrs. Peggy Pennell, for perjury under oath doing trial, which have been proven doing the depositions. Also, Mr. Norris (respondent) have full knowledge and understanding that his client has been lying from the depositions all the way to trial, about who signed the documents that is in question in this case, Mr. Norris (respondent) has on three different occasions have try to get the case dismissed, based on the fact that it was just the opposite, of what his client was saying and lying, that I Joe Clemons (appellant) had signed the documents in front of her face or present. Mr. Norris (respondent) had tried on 4-1-2020, (1) Motion to compel discovery, (2) Summary Judgement on 4-22-2020, and

(3) Determine sufficiency on 6-10-2020, and he lost them all. On August 23 & 24, 2021, which is what this appeal is all about, at trial Mr. Norris (respondent) put that same client on the stand, (but, before the trial started, I took Mr. Norris to the bench before the judge and told the judge that Mr. Norris know that his client have been lying, and if he put her on the stand to defend or establish that same lie or commit perjury, he and his client will be breaking the laws of the court and SC Rule 3.3) and she did exactly what she had been doing along in court under oath, and then when my wife was on the stand, Mr. Norris (respondent) was cross-examined her was proving the very opposite of what his client has just stated, confirming that his client was lying and knew it. I also caught Mr. Norris (respondent) misrepresenting, and falsifying documents which is a felony crime. My request in this motion is for the appellate court to take the appropriate action concerning the perjury and the misrepresenting of falsifying documents at that trial, and to show that is a crime that SC courts don't condone. Because Mr. Norris and his client have been doing these things from the outset of this case with no regards for our laws and respect of the court.

Thank you, Ms Kitchings,



Joe Clemons Pro Se Litigant/Apologist for Appellant

2202 Addidas St., Eutawville, South Carolina 29048

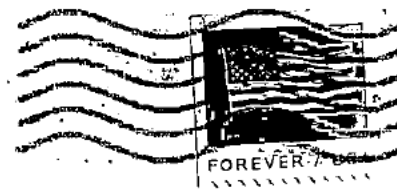
(843) 753-7007

(1) A filing fee of \$50.00

Joe Clemons  
2202 Addidas St.  
Eutawville, SC 29048

COLUMBIA SC 290

01 DEC 2021 PM 4 1



**RECEIVED**

DEC 03 2021

SC Court of Appeals

South Carolina Court  
of Appeals  
1220 Senate Street  
Columbia, SC 29201

29201-376999



THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**May 23 2022**

**SC Court of Appeals**

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Jennifer McCoy, Circuit Court Judge

Case No. 2021-001183

Joe Clemons

Appellant,

v.

PEGGY H. PINNELL AGENCY, PEGGY H.  
PINNELL INSURANCE AGENCY, INC.  
STATE FARM LIFE INSURANCE COMPANY,  
(jointly and severally liable),

Respondent,

---

**PROOF OF SERVICE**

---

I certify that I have served the RE-SUBMITTED MOTION FOR ACTION TO BE TAKEN on Respondent by electronic service on May 22, 2022, as reflected on email attached hereto and as referenced below:

Charles R. Norris, Attorney  
charles@whelanmellen.com

By: s/Joe Clemons, Pro Se  
E-Mail: clemonswelding1@gmail.com  
2202 Addidas Street  
Eutawville, South Carolina 29048  
(843) 753-7007

Eutawville, South Carolina

May 22, 2022