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OCT 10 2022

SOUTH CAROLINA COURT OF APPEALS SC Court of Appeals

KERSHAW COURT COMMON PLEAS JUDGE DEBORAH GIST
BENJAMIN vs DISSEDER, 6/14/22, GRANTING SUMMARY
JUDGMENT CIV: 2018-CP-28-00759

Sept. 30th 2022,

RE: SHAMDH, A. MATTO vs. SCDC CIV: 2018-CP-28-00759
"NOTICE OF APPEAL"

DEAR CLERK MADAM JEWAN ABBOTT KITCHINGS;

PLEASE FILE ENCLOSED NOTICE OF APPEAL IN COURTS RECORD

EXH. A, SWORN AFFIDAVIT OF SERVICE ATTEST:

① DOCUMENT MADE IN GOOD FAITH, NOT FRIVOLOUS;

② I'M WORSE OFF CAN'T AFFORD PAYING FEE AND WAIVE IT PER
28 U.S.C. 1915(d). ATTACHED PRIMA FACIE EXH. A, SWORN DECLARATION OF
SERVICE ATTEST 9/1/22, TRANSFER, LATE DELIVERY LEGAL PROPERTY;
EXH. B, SWORN DECLARATION OF SERVICE ATTEST TO DIRE MEDICAL
EMERGENCYS; EXH. H, SWORN DECLARATION OF SERVICE OF 6/14/22

ORDER. ALL PRIMA FACIE EVIDENCE APRIATE PLUS RULE 6 (EXTENSION)
OF TIME, 9/1/22, SERVICE OF NOTICE OF APPEAL AFTER 30 DAYS,

EXTRA COPY ENCLOSED TO PROVIDE ME A CHECKED STAMPED COPY
VIA RULE 26 ON THIS DAY 11/30, MONDAY, OCT. 1, 2022

RESPECTFULLY SUBMITTED

Shahid Mafid

WITHOUT PREJUDICE (Oct-20)

LEGAL MAIL

KLH/12

EXH. 1

AFFIDAVIT OF SERVICE

I ATTEST UNDER PENALTY OF PERJURY
THAT BELOW IS TRUE.

- 1) THIS DOCUMENT IS MADE IN GOOD FAITH
AND FACTUALLY NON FRIVOLOUS
- 2) I'M INDIGENT AND CANT AFFORD PAY
FILING FEE AND PROTECTED INFAMA
PAUPERIS OF U.S. C § 1915b

THIS IS TRUE, SWORN TO ME ON THIS DAY OF
June, MONTH OF, 20 12022

EXPIRATION DATE: 12-01-2025

S/ Melissa Ortiz S/ Shahid Majeed
NOTARY PUBLIC

RECEIVED

OCT 10 2022

SC Court of Appeals

[Handwritten signature]

EXH. 2.1

DECLARATION OF SERVICE,

I ATTEST VIA § 1746 UNDER PENALTY OF PERJURY THAT BELOW FACTS IS TRUE.

1) THURS, 9/1/22, AFTER I SAW HEART DOC. AT PRISMA HEALTH, I WAS TRANSFERRED TO B.R.C.I. CUNYABIE MENTAL HEALTH UNIT #196;

2) K.C.I. PROPERTY DTC. SGT. HUDSON KEPT ALL LEGAL WORK AND PROPERTY THAT WAS IN CELL B LEGAL BOXES, 2 MESH BAGS, 2 PLASTIC BAGS FOR INVENTORIAL. I DIDNT RECEIVE LEGAL PROPERTY BACK TO MON. 9/12/22.

3) ALL LEGAL BOXES (3) TAKEN EXCEPT (1) ALL 2 BAGS TAKEN AS WELL AS 2 MESH BAGS TAKEN. ALL LEGAL PROPERTY WAS PLACED IN TELS UNORGANIZED MIXED UP, DUMPED OUT (8) DIFFERENT TRASH BAGS ON, 9/12/22

4) IT TOOK 14 DAYS TO SORT, ORGANIZE LEGAL PROPERTY BACK TOGETHER. SOME LEGAL WORK WAS MISSING. I FOUND OUT 9/28/22

9/28/22

DATE:

S/ Shabir Majid

WITHOUT PREJUDICE (DCP-001)

RECEIVED

OCT 10 2022

SC Court of Appeals

LEGAL
MAIL
ONLY

Calibrated

EXH. B. 1

DECLARATION OF SERVICE

I ATTEST VIA § 1046 UNDER PENALTY OF PERJURY THAT BELOW FACTS IS TRUE.

1/ SAT., 7/16/22. Appx. 11:30 am I SUFFERED EITHER A STROKE OR HEART ATTACK. I COULDN'T MOVE. LEFT SIDE BODY FELT LIKE SIDE CHEST, WAISTE, ARM BEEN HIT WITH A BAT. I WAS DENIED MEDICAL CARE!

2/ I WAS LEFT ON FLOOR TO 5pm 6/8 hrs. THEN SGT. HILL, SGT. RANDOLF AND MS. BROWN LIFTED ME UP IN BED! I WAS DENIED MEDICAL CARE!

3/ FRI., 7/21/22. Appx. 6:30 pm I VOMITED UP BLOOD ON BED, FLOOR AND FELL ON FLOOR. I WAS DENIED MEDICAL CARE BY SGT. MATTHEWS, SGT. JENKINS. I HAD CRAWLED BACK IN BED Appx. 10:45 pm!

4/ FRI., 8/5/22. I SAW NURSE PRACTITIONER MS. MCDONNELL WHOM ORDERED BLOOD DRAWN FOR TEST. MY BLOOD COUNT WAS (6) AND REDUCOR COUNT IS (10) FOR HUMANS. I WAS BUSHED TO PRISMA HEALTH HOSPITAL FOR BLOOD TRANSFUSION, FOR I HAVE INTERNAL BLEEDING!

5/ I SAW G.I. DR. WHOM REFERRED ME TO HEART DR. I SAW 9/1/22, AT PRISMA HEALTH. HE PRESCRIBED MEDS TO PUT ME SLEEP FOR COLONOSTOPHY TO SEE: (1) WHERE BLOOD FROM INTERNAL BLEEDING COMING FROM, COLON OR ESOPHAGUS ETC; (2) IF I HAVE COLON CANCER

6/ I AWAIT COLONOSTOPHY DATE NOW. I'M DIZZY, NAUSEATED MOST OF DAY IN BED. I WEIGH 20 LBS, NOW 139 LBS. AND PRESCRIBED (H) ENDORES A DAY.

9/28/22

S. [Signature]

WITHOUT PREVIOUS RELEASE

[Signature]

LEGAL DATE:
MAIL
ONLY

Exh. H. 1

DECLARATION OF SERVICE

I ATTEST VIA § 1746 UNDER PENALTY OF PERJURY THAT
BELOW FACTS IS TRUE.

IF I DIDNT RECEIVE ORDER, 6/14/22, JUDGE DEANDREGIST
BENJAMIN UNITH, 7/1/22, MAX. (10) DAYS AFTER JUDGMENT
FROM DEFENDANT J. RUFUS BRATTON III ESQ.

IF THE 6/14/22 ORDER IS MISSING. I WRITE CLERK, JANE HASTY,
J. RUFUS BRATTON III ESQ. FOR A COPY.

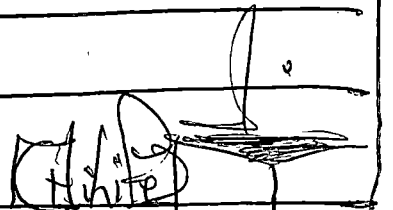
9/28/22

DATE:

Shahid Nafid

LOUISIANA PRE-JUDICIAL ORDER

LEGAL
MAIL
ONLY



CLERK'S COPY

SOUTH CAROLINA COURT OF APPEALS

KERSTAN COURT COMMON PLEAS JUDGE DEANORE GIST PENTONIN

#266 ORDER, 6/14/22, GRANTING SUMMARY JUDGMENT

CIV. 2018-CP-28-COT59

SEP. 30th 2022

SHAHID A. MAJID

APPELLANT

"Proof of Service"

VS.

SCDC

APPELLEES

I CERTIFY UNDER PENALTY OF PERJURY THAT SERVICE OF NOTICE OF APPEAL WAS MADE VIA U.S. POSTAL MAIL ON DATE, 10/3/22

TO ALL PARTIES:

CLERK DEANETTE KITCHINGS P.O. BOX 11629 COLUMBIA, S.C. 29911

OR A. RUFUS BRATTON III, NO. 25096 - P.O. DRAWER 1981 FLORENCE

S.C. 29903

Sincerely

Shahid Majid

RECEIVED

W/IT/TPRE JUDGE LODI 2022 OCT 10 2022

SC Court of Appeals

LEGAL MAIL ONLY

[Handwritten signature]

CLERK'S COPY

SOUTH CAROLINA COURT OF APPEALS

KERSHAW COURT COMMON PLEAS JUDGE DEANDRE GIST

BENJAMIN #2161 ORDER 6/14/22, GRANTING SUMMARY

JUDGMENT CN: 2018-CP-28-00959.

SHAHIDH, A. MAJID

1 SEP 30 2022

APPELLANT **RECEIVED**

VS. OCT 10 2022 NOTICE OF APPEAL, II

SC02 SC Court of Appeals

Appellees

ADA- APPELLANT HURBY MOVES SC COURT OF APPEALS TO URBURN
JUDGE DEANDRE GIST BENJAMIN #2161 ORDER 6/14/22, GRANTING
SUMMARY JUDGMENT BASED ON BELOW POINTS FACTS,
CASE LAWS ETC.

GROUND 1

ON 4/10/22, SUMMARY JUDGMENT OF APPELLATE WAS HEARD AND
JUDGE DEANDRE GIST BENJAMIN #2161 INSTRUCTED ADA APPELLANT
TO CITE CASES GIVES CONSTITUTIONAL RIGHT OF ACTION IN COURT.
APPELLANT CITED BELOW CASES IN WHICH THE WHOLE CITATION IS MISSING,
THAT'S BECAUSE LEGAL WORK SOME DESTROYED BY SGT. HUDSON
K.C. WHO KEPT ALL LEGAL WORK DATED TRANSFER 9/1/22, FROM
KPC-1 TO BPCI, AND DIDNT SEND UNTIL 9/12/22

M RODRIGUEZ IS MCKENNING APRIL 22 2023

2/ CIT. WOOD IS IDAHO

3/ LATSON VS. JONES

4/ BROMELL VS. IDAHO

5/ HOUSTON VS. BLACK

LEGAL MAIL

10/10/22

II.

1. HUDSON VS. McMillion

IN RETALIATION, CONSPIRACY WITH APPELLEES JUDGE BENTON IN PREJUDICELY CITED "STOP! YOU STILL HAVE NOT CITED NO CLASSIS...)"

APPELLANT SAID (DO YOU WANT ME TO SEND THEM TO YOU? THERE ARE ALL FEDERAL CASES ENTITLING ME CONSTITUTIONAL RIGHT...)"

JUDGE CITED "I'LL DO MY OWN RESEARCH..."

BELOW U.S. SUPREME COURT CASE LAWS CITE PRIMA FACIE EVIDENCE PRESENTED BY NON MOVING PARTY PRECLUDES SUMMARY JUDGMENT ENTITLED PLAINTIFF TO TRIAL BY JURY/PEERS.

1. JACK ANDERSON VS. LIBERTY LOBBY INC. 499 U.S. 249, 256 / 106 S.Ct. 2505 / 6/05 / 1986 / NO. 84-1002 U.S. SUPREME COURT JUSTICE WHITE

HELD: "(1) RULING ON MOTION SUMMARY JUDGMENT OR DIRECTED VERDICT NECESSARILY IMPLIES THAT SUBSTANTIVE EVIDENTIARY STANDARD OF PROOF THAT WOULD APPLY AT TRIAL ON MERITS"

2. WHEN DETERMINING IF GENUINE FACTUAL ISSUE TO ACTUAL NOTICE EXISTS IN A LIBEL SUIT BROUGHT BY A PUBLIC FIGURE, TRIAL JUDGE MUST BEAR IN MIND THE ACTUAL QUANTUM & QUALITY OF PROOF NECESSARY TO SUPPORT LIABILITY UNDER THE NY TIMES DOCTRINE. (VACATED & REMANDED)"

2. LOU POLLER VS. COLUMBIA BROADCASTING SYSTEM INC. ET AL 82 S.Ct. 486 / 2/19/1962 (SUPREME COURT JUSTICE MR. CLARK HELD THAT

PLEADINGS & AFFIDAVITS PRESENTED ISSUES OF FACT AS TO PARTICIPATION OF A NATIONWIDE BROADCASTING COMPANY AND OTHERS IN A CONSPIRACY TO RESTRAIN TRADE OR ELIMINATE COMPETITION BY CANCELING AN AFFILIATION CONTRACT AND AFFILIATION CONTRACT ELIMINATING A CERTAIN LOCAL

BROADCASTING STATION FROM THE BROADCAST FIELD. (VACATED & REMANDED)

III.

IN A CERTAIN CITY, PRECLUDING SUMMARY JUDGMENT.
REVERSED & REMANDED)

APPELLANT ABIDED BY U.S. CASE LAWS AND SUBMITTED BELOW
PRIMA FACIE EVIDENCE OF VERIFIED COMPLAINT, DISCOVERY
RULE 34 PRODUCTION OF DOCUMENTS 9/18/00; 10/08/00 BELOW
WHICH ENTITLED CONSTITUTIONAL RIGHT OF ACTION AT SUMMARY
JUDGMENT HEARING.

PRIMA FACIE EVIDENCE,

1/ DEFENDANTS VIOLATED 42 U.S.C. 14043g (b)(2)(c)(1) 24 HR.

HOTLINE NOT PROVIDED

2/ DEFENDANTS VIOLATED § 119.01 CRIMINAL & ADMINISTRATIVE AGENCY
INVESTIGATIONS NOT PROVIDED

3/ DEFENDANTS VIOLATED § 119.01 STAFF AGENCY REPORTING DUTIES
NOT ONE DID INCIDENT REPORT

4/ DEFENDANTS VIOLATED § 115.053 INSIDE AREA ACCESS CONFIDENTIAL
SUPPORT SERVICES NOT PROVIDED

5/ DEFENDANTS VIOLATED § 115.083 MEDICAL AND MENTAL HEALTH SERVICE
NOT PROVIDED

6/ DEFENDANTS VIOLATED § 115.076 DISCIPLINARY SANCTIONS FOR STAFF
NOT ONE DID DISCIPLINARY SANCTIONS

7/ DEFENDANTS VIOLATED § 115.0620 PROTECT AGAINST RETALIATION
NOT PROVIDED

8/ DEFENDANTS DID RECEIVE \$6.5 million IN 2012 IN WHICH SOME
DID RECEIVE FROM FEDERAL GOVERNMENT AND STILL NOT PROVIDED

CARE

LEGAL MAIL

01/15/01

IV.

9/ DEFENDANTS DID DESTROY VIDEO FOOTAGE SEXUAL ASSAULT IN C.I. (CRISIS INTERVENTION CELL). SEE 10/88/20 RULE 34 PRODUCTION OF DOCUMENTATION ANSWER

10/ DOCUMENT PROVIDED BY APPELLANT PRIMA FACIE EVIDENCE MENTALLY ILL AND BECAME LEGALLY DISABLED, MAR 01-2011, AND RECEIVED \$82,962 IN S.S. I BENEFITS AT TIME SENTENCE. 1/31/14

ABOVE (10) PRIMA FACIS OF DOCUMENTATION PRESENTED AT SUMMARY JUDGMENT HEARING, 4/20/22, VIOLATE CONSTITUTIONAL RIGHT OF ACTION, VIOLATION SOC POLICY DP. 21.12; FEDERAL REGISTER VOL. 99 NO. 199 (WEDNESDAY) JUNE 20 2012 / RULES REGULATIONS PART II DEPARTMENT OF JUSTICE. BELOW CASE HAS GUARANTEES CONSTITUTIONAL RIGHT OF ACTION DUE TO PREA ASSAULT.

CASE LAUS:

1/ GENE WOODHUIS VS. COMMONWEALTH OF VIRGINIA 11TH CIRCUIT COURT OF APPEALS NO. 22-1576 / 482 F.2d 889 / 9/22/1993 / COURT OF APPEALS THAT PRISONER CANNOT ESTABLISH CRUEL AND UNUSUAL PUNISHMENT ALTHOUGH HE HIMSELF HAD NOT BEEN ATTACKED AND DIDN'T FEAR ATTACK PARTICULARLY SINCE HE WAS IN DANGER OF REPRISAL ON ACCOUNT OF HAVING AIDED YOUNGER PRISONER WHO WAS BEING SEXUALLY ASSAULTED. (GRATED & REMANDED) 21

2/ BRICE, 58 F.3d 105 (1) JUSTICE FARMER 511 US AT 843 N 8 114 S Ct. 1920 14 (NEVER THE LESS EVEN UNDER THIS SUBJECTIVE STANDARD A PRISON OFFICIAL CANNOT HIDE BEHIND AN EXCUSE THAT HE WAS UNAWARE OF A RISK NO MATTER HOW OBVIOUS

3/ GRIFFINSON VS. ANDERSON, 588 F.3d 968, 972 / 7TH CIR. 2019 / (CORRECTIONAL OFFICIALS HAVE CONSTITUTIONAL DUTY TO PROTECT INMATE FROM VIOLENCE) 11

LEGAL MAIL
Chick

V.

4/ ADIB EDDIE PAMEZ MAKRDESS / VS / J. FIELDS 789 F.3d 1061

MARCH 12, 2019 / COURT OF APPEAL JOSE LYNN WELDT THAT: THE SUBJECTIVE ACTUAL KNOWLEDGE STANDARD REQUIRED TO FIND 8TH AMENDMENT DELIBERATE INDIFFERENCE MAY BE PROVEN BY CIRCUMSTANTIAL EVIDENCE THAT A RISK WAS SO OBVIOUS THAT IF HAD TO HAVE BEEN KNOWN. VIOLATED / REMANDED"

5/ J.R. v. AND M. J. v. VS. PUCK COUNTY AND DARYL L. CHRISTENSEN 960 F.3d

369 U.S. COURT OF APPEAL 7TH CIRCUIT 5/15/2019 / 4 INMATES AWARDED \$2 million COMPENSATORY DAMAGES, \$3.25 million PUNISHMENT COURT OF APPEAL CIRCUIT JUDGE SCANDR ON REHEARING ENBANC: (1) JFC ACTED WITH DELIBERATE INDIFFERENCE TO JAIL INMATE SAFETY AND VIOLATED 8TH AMENDMENT; (2) EVIDENCE SUFFICIENT TO SUPPORT COUNTY LIABILITY UNDER §1983

6/ SMITH VS. COCHRAN 339 F.3d 1005 / NO. 01-5085 (OCTOBER 8/12/03)

(1) COURT OF APPEALS CIRCUIT JUDGE BEEL: (1) EXAMINERS ALLEGED SEXUAL CONTACTS WITH INMATE DEMONSTRATED USE EXCESSIVE FORCE AND MALICE SUFFICIENT TO IMPLICATE AN 8TH AMENDMENT VIOLATION: (2) STATE DOC. DELEGATED IT'S POLICE AND SUPERVISORY AUTHORITY OVER WORK RELEASE INMATE SO THAT CENTERS SUPERVISORY PERSONNEL BRE DUTY UNDER 8TH AMENDMENT TO REFRAIN FROM USING EXCESSIVE FORCE AGAINST INMATE; (3) ALLEGED NON CONSENSUAL SEX BETWEEN INMATE / EXAMINER VIOLATED CLEARLY ESTABLISHED FEDERAL LAW AND THIS EXAMINER WAS NOT ENTITLED TO QUALIFIED IMMUNITY"

7/ HOPKIN VS. BOB BUNSON F.3d 1063, 1068 (OCTOBER 1993) / ALL INMATE HAS

A CONSTITUTIONAL RIGHT TO BE SECURE IN HER BODILY LEGAL MAIL INTERESTS AND FREE FROM ATTACK BY PRISON GUARDS"

VI.

8/ BARNER VS. PULSIPHER 143 F.3d 1899, 1810 (10th Cir. 1998) (PLAINTIFF
DEPRIVATIONS RESULTING FROM THE SEXUAL ASSAULTS ARE
SUFFICIENTLY SERIOUS TO CONSTITUTE A VIOLATION UNDER THE 8th (LISER)!!

SUMMARY/

APPELLANT HUMBLY MOVES SIC COURT OF APPEALS TO UNRESTRAIN JUDGE
DEANDRE GIST DENY JUDGMENT # 2101 DATES 6/14/22 GRANTING
SUMMARY JUDGMENT AND VACATE AND REMAND CASE TO COVER
COST FOR TRIAL ON THIS DAY OF 3RD MONTH OF OCT. 2022

RESPECTFULLY SUBMITTED

Abdul Nafid

W/ FOOTPRINT JUDGE LOCK 20

LEGAL MAIL

Abdul Nafid

APPELLEES

SOUTH CAROLINA COURT OF APPEALS

KERSHAW COURT COMMON PLEAS JUDGE DEANDRE GIST BENJAMIN

2161 OPER, 6/14/22 GRANTING SUMMARY JUDGMENT

CIN: 2018-CP-08-00789

SEPT. 30TH 2022

RE: SHAHID L.A. MAJID VS. SCDC CIN: 2018-CP-08-00789

"NOTICE OF APPEAL"

DEAR CLERK MADAM JENN ABBOTT WITCHINGS;

PLEASE FILE ENCLOSED NOTICE OF APPEAL IN COURTS
RECORD, EXH. I, SWORN AFFIDAVIT OF SERVICE ATTEST:

① DOCUMENT MADE IN GOOD FAITH, NOT FRIVOLOUS;

② I'M INDIGENT CANT AFFORD PAY FILING FEE AND WAIVE IT
PER 28 U.S.C § 1915(a). ATTACHED PRIMA FACIE, EXH. 2, SWORN

DECLARATION OF SERVICE ATTEST 9/1/22 TRANSFER, LATE
DELIVERY LEGAL PROPERTY; EXH. 3, SWORN DECLARATION OF SERVICE
ATTEST TO DIRE MEDICAL EMERGENC(S); EXH. 4, SWORN
DECLARATION OF SERVICE of 6/14/22 USOPAS. ALL PRIMA FACIE

EVIDENCE VALIDATE PLUS Rule 6 EXTENSION OF TIME 9/10/22
SERVICE OF NOTICE of Appeal AFTER 30 DAYS. EXTRA COPY
ENCLOSED TO PROVIDE ME A CLERKED STAMPED COPY
VA Rule 2(a) ON THIS DAY OF 3RD MONTH OF OCT., 2022.

RESPECTFULLY SUBMITTED

Shahid Majid

WITHOUT PREJUDICE LOCK 207

RECEIVED

OCT 10 2022

SC Court of Appeals

EXH. 6

AFFIDAVIT OF SERVICE

I ATTEST UNDER PENALTY OF PER JURY THAT BELOW IS TRUE.

1/ THIS DOCUMENT IS MADE IN GOOD FAITH AND FACTUALLY NON FRAUDULOUS

2/ Jim INDIGENT AND WANT AFFORD PAY FILING FEE AND PROTECTED INTAUMA PAUPERIS BY USC § 1915G

THIS IS TRUE SWORN TO ON THIS DAY OF June, MONTH 21, 2022 EXPIRATION DATE: 12-01-2025

s/ Melissa [Signature]
NOTARY PUBLIC

s/ [Signature]

RECEIVED

OCT 10 2022

SC Court of Appeals

[Signature]

EXH. 21

DECLARATION OF SERVICE,

I ATTEST VIA §17416 UNDER PENALTY OF PERJURY THAT
BELOW FACTS IS TRUE.

1/ THURS, 9/1/02, AFTER I SAW HEART DOC. AT PRISMA
HEALTH, I WAS TRANSFERRED TO B.R.I.C.T CONGARPE
MENTAL HEALTH UNIT #136

2/ K.R.I.T PROPERTY UFG. SST. HUDSON KEPT ALL LEGAL WORK AND
PROPERTY THAT WAS IN CELL '3 LEGAL BOXES' 2 MESH BAGS,
& PLASTIC BAGS FOR INVENTORY. I DIDNT RECEIVE LEGAL
PROPERTY BACK TO ME ON 9/18/02.

3/ ALL LEGAL BOXES (3) TAKEN EXCEPT (1). ALL 2 BAGS TAKEN
AS WELL AS 2 MESH BAGS TAKEN. ALL LEGAL PROPERTY WAS
PLACED IN CELLS UNORGANIZED, MIXED UP, DUMPED OUT (8)
DIFFERENT TRASH BAGS ON, 9/18/02

4/ IT TOOK 14 DAYS TO SORT, ORGANIZE LEGAL PROPERTY BACK
TOGETHER. SOME LEGAL WORK WAS MISSING, I FOUND
OUT 9/26/02,

9/28/02

DATE:

s/ Shahid Majid

WITHOUT PREJUDICE (001-20)

Shahid Majid

EXHIB. 1

DECLARATION OF SERVICE,

I ATTEST VIA § 1746 UNDER PENALTY OF PERJURY THAT
BELOW FACTS IS TRUE,

1) SAT., 7/16/22, Appx. 11:30 a.m I SUFFERED EITHER A
STROKE OR HEART ATTACK. I COULDN'T MOVE LEFT SIDE BODY
FELT LIKE LEFTSIDE CHEST, WAISTE, ARM BEEN HIT WITH
A BAIT. I WAS DENIED MEDICAL CARE!;

2) I WAS LEFT ON FLOOR TO 5pm 6 1/2 HRS. THEN SGT. HILL,
SGT. RANDOLF, AN MS. BROWN LIFTED ME UP IN BED.
I WAS DENIED MEDICAL CARE!;

3) FRI., 7/21/22, Appx. 6:30 p.m I VOMITTED 1 P BLOOD ON BED, FLOOR
AND FELL ON FLOOR. I WAS DENIED MEDICAL CARE BY, SGT. MATTHEWS,
SGT. JENKINS. I HAD CRAWLED BACK IN BED Appx. 10:45 p.m;

4) FRI., 8/5/22, I SAW NURSE PRACTICIONER MS. MCDANIELS WHOM ORDERED
BLOOD DRAWN FOR TEST. MY BLOOD COUNT WAS (6) AND REGULAR
COUNT IS (12) FOR HUMANS. I WAS RUSHED TO PRISMA HEALTH
HOSPITAL FOR BLOOD TRANSFUSION, FOR I HAVE INTERNAL BLEEDING;

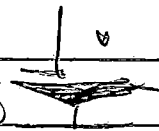
5) I SAW G.I DOC. WHOM REFERRED ME TO HEART DOC. I SAW
9/1/22, AT PRISMA HEALTH. HE PRESCRIBED MEDS TO PUT ME
SLEEP FOR COLONOSTOPHY TO SEE: (1) WHERE BLOOD FROM
INTERNAL BLEEDING COMING FROM, COLON OR ESOPHAGUS ETC;

(2) IF I HAVE COLON CANCER

6) I AWAIT COLONOSTOPHY DATE NOW. I'M DIZZY, NAUSIATED
MOST OF DAY IN BED. I'VE LOST 20 LBS. NOW 159 LBS. AND PRESCRIBED
CHENSURES A DAY.

9/28/22
DATE:

Shahid Majid
WITHOUT PREVIOUS (001-20)



EXH. 4.

DECLARATION OF SERVICE

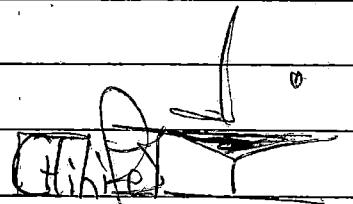
I ATTEST VIA § 1746 UNDER PENALTY OF PERJURY
THAT BELOW FACTS IS TRUE.

1/ I DIDNT RECEIVE ORDER 6/14/22, JUDGE OBANOBE
GUST BENJAMIN UNTIL 7/11/22, MON. (10) DAYS AFTER
JUDGMENT FROM DEFENDANTS J. BUFUS BRATTEN III ESA.

2/ THE 6/14/22 ORDER IS MISSING. I WROTE CLERK
JANET HASTY; J. BUFUS BRATTEN III ESA, FOR
A COPY.

19/08/22,
DATE:

Shahid Masid
WITHOUT PREJUDICE (Oct. 20)



1 Appellees 4

SOUTH CAROLINA COURT OF APPEALS

KERSHAW COURT COMMON PLEAS JUDGE DEANDRE GIST BENJAMIN
#2161 ORDER, 6/14/22, GRANTING SUMMARY JUDGMENT
C/N: 2018-CP-08-00759

Shahid L. A. MAJID

SEPT. 30TH 2022

Appellant

vs.

"PROOF OF SERVICE"

SCDC

Appellees

I CERTIFY UNDER PENALTY OF PERJURY THAT SERVICE
OF NOTICE OF APPEAL WAS MADE VIA U.S. POSTAL
MAIL ON DATE 10/8/22, TO ALL PARTYS:

1) CLERK JEANNETTE HITCHINGS - P.O. BOX 11629 COLUMBIA, SC 29211
2) T. RUFUS PRATTEN III, NO. 25096 - P.O. DRAWER 1981
FLORENCE, SC 29503

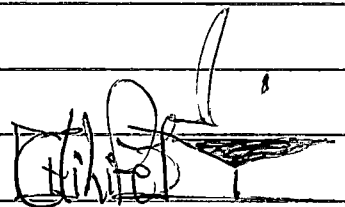
Sincerely,
Shahid Majid

WITHOUT PREJUDICE (10/12/22)

RECEIVED

OCT 10 2022

SC Court of Appeals



Appellees

SOUTH CAROLINA COURT OF APPEALS

Kershaw County Common Pleas Judge Deandre Gist

BENJAMIN #2161 ORDER, 6/14/22, GRANTING SUMMARY JUDGMENT ON: 2018-CP-28-00789.

Shahin L. A. MAJID
Appellant

Sept 30th 2022

vs:

"NOTICE OF APPEAL"

SCDC

Appellees

ADA APPELLANT HUMBLy moves SC COURT OF APPEALS TO
VERTUAN JUDGE DEANDRE GIST BENJAMIN #2161 ORDER
6/14/22, GRANTING SUMMARY JUDGMENT BASED ON
BELOW PRIMA FACIE FACTS, CASE LAW ETC.

GROUND 1.

On 4/20/22, Summary Judgment of Appellants was heard
and Judge Deandre Gist Benjamin #2161 instructed ADA
Appellant to cite cases given Constitutional Right of Action
in Court. Appellant cited below cases in which the whole
citation is missing, that's because legal work summary
destroyed by Sgt. Hudson K.C.I, whom kept all legal work day
transfer 9/1/22 from KCI to BRCI; and didn't send until 9/18/22.
W. RODRIGUEZ vs. McCLENNING April 22, 2015

- 2) C.F. WOOD vs. IDAHO
- 3) WATSON vs. JONES
- 4) BRIDGELL vs. IDAHO
- 5) HOUSTON vs. BLOCK
- 6) HUDSON vs. McMillion

RECEIVED

OCT 10 2022

SC Court of Appeals

II.

IN RETALIATION, CONSPIRACY WITH APPELLERS JUDGE BENJAMIN
PREJUDICELY CITED " (STOP! YOU STILL HAVE NOT CITED NO CASES...) "
APPELLANT SAID (DO YOU WANT ME TO SEND THEM TO YOU? THERE
ALL FEDERAL CASES ENTITLING ME CONSTITUTIONAL RIGHTS...) "
JUDGE CITED (I'LL DO MY OWN RESEARCH.) "

BELOW U.S. SUPREME COURT CASES ALWAYS CITE PRIMA FACIE
EVIDENCE PRESENTED BY MOVING PARTY PRECLUDES SUMMARY
JUDGMENT ENTITLED PLAINTIFF TO TRIAL BY JURY OF PEERS,

11 JACK ANDERSON VS. LIBERTY LOBBY INC. 472 U.S. 213, 256 106
S.Ct. 2503 / 6/23/1986 / NO. 84-1603 U.S. SUPREME COURT

JUSTICE WHITE HELD: " (RULING ON MOTION SUMMARY) JUDGMENT
BY DIRECTED VERDICT (NECESSARILY) IMPLIES THAT SUBSTANTIVE
EVIDENTIARY STANDARD OF PROOF THAT WOULD APPLY AT TRIAL ON MERITS "

(2) WHEN DETERMINING IF GENUINE FACTUAL ISSUE AS TO ACTUAL
MALICE EXISTS IN A LIBEL SUIT BROUGHT BY A PUBLIC FIGURE,
TRIAL JUDGE MUST BEAR IN MIND THE ACTUAL QUANTITY
& QUALITY OF PROOF NECESSARY TO SUPPORT LIABILITY UNDER THE
NY TIMES DOCTRINE) VACATED & REWRITEN

21 LOU PULLES VS. COLUMBIA BROADCAST SYSTEM INC. ET AL
82 S.Ct. 486 / 2/19/1962 (SUPREME COURT JUSTICE MR. CLARK
HELD THAT PLEADINGS & AFFIDAVITS PRESENTED ISSUES OF FACT AS TO
PARTICIPATION OF A NATIONWIDE BROADCASTING COMPANY TO OTHERS
IN A CONSPIRACY TO RESTRAIN TRADE OR ELIMINATE COMPETITION
BY CANCELING AN AFFILIATION CONTRACT AN AFFILIATION CONTRACT,
ELIMINATING A CERTAIN LOCAL BROADCASTING STATION FROM THE
BROADCAST FIELD IN A CERTAIN CITY, PRECLUDING SUMMARY
JUDGMENT. REVERSED & REWRITEN

Chihed

III.

APPELLANT ABIDED BY US CASELAW AND SUBMITTED BELOW
PRIMA FACIE EVIDENCE OF VERIFIED COMPLAINT, DISCOVERY/
RULE 34 PRODUCTION OF DOCUMENTS 9/18/20; 10/28/20
BELOW WHICH ENTITLED CONSTITUTIONAL RIGHT OF ACTION AT
SUMMARY JUDGMENT HEARING.

PRIMA FACIE EVIDENCE

1/ DEFENDANTS VIOLATED 42 U.S.C. 14043g (b)(2)(C)(D) 24 HR.

HOTLINE NOT PROVIDED

2/ DEFENDANTS VIOLATED § 115.91 CRIMINAL ADMINISTRATIVE
AGENCY INVESTIGATIONS NOT PROVIDED

3/ DEFENDANTS VIOLATED § 115.61 STAFF AGENCY REPORTING

DUTIES NOTICE DID INCIDENT REPORT

4/ DEFENDANTS VIOLATED § 115.253 OUTSIDE PREA ACCESS CONFIDENTIAL
SUPPORT SERVICES NOT PROVIDED

5/ DEFENDANTS VIOLATED § 115.283 MEDICAL / MENTAL HEALTH SERVICE
NOT PROVIDED

6/ DEFENDANTS VIOLATED § 115.296 DISCIPLINARY SANCTIONS FOR
STAFF NOTICE DID SANCTIONS & DISCIPLINARY

7/ DEFENDANTS VIOLATED § 115.267 PROTECT AGAINST RETALIATION
NOT PROVIDED

8/ DEFENDANTS DID RECEIVE \$6.5 million IN 2017 IN WHICH 9000
DID RECEIVE FROM ~~XXXX~~ AND STILL NOT PROVIDED PREA CARE

9/ DEFENDANTS DID DESTROY VIDEO FOOTAGE SEXUAL ASSAULT IN
C.I. (CRISIS INTERVENTION CELL) SEE 10/28/20 RULE 34 PRODUCTION
OF DOCUMENTATION ANSWERS

10/ DOCUMENT PROVIDED BY APPELLANT PRIMA FACIE EVIDENCE
MENTALLY ILL AND BECAME LEGALLY DISABLED MARCH 11, 2011 AND
RECEIVED \$82,962 IN SSI BENEFITS AT TIME SENTENCE 11/20/11.

C. H. H.

IV

Above (10) Prima Facies of Documentation Presented
AT SUMMARY JUDGMENT HEARING, 4/20/02, VALIDATE
CONSTITUTIONAL RIGHT OF ACTION, VIOLATION SEC. POLICY
UP. 21-12; FEDERAL REGISTER / VOL 27, NO. 199 / WEDNESDAY
JUNE 20, 2012 / RULES REGULATIONS PART II, DEPARTMENT
OF JUSTICE. Below case law GUARANTEE CONSTITUTIONAL
RIGHT OF ACTION DUE TO INEA ASSAULT.

CASE LAWS:

1/ GENE WOOD Hous vs. COMMONWEALTH OF VIRGINIA 11th
CIRCUIT COURT OF APPEALS NO. 79-1526 / 487 F.2d 889 / 7/22/1973

"(C. 2, A HELD THAT PRISONERS COULD ESTABLISH CRUEL AND UNUSUAL
PUNISHMENT ALTHOUGH HE HIMSELF HAD NOT BEEN ATTACKED (DID NOT
FEEL ATTACK, PARTICULAR) SINCE HE WAS IN DANGER OF REPEATED ON
ACCOUNT OF HAVING ANOTHER YOUNGER PRISONER WHO WAS BEING
SEXUALLY ASSAULTED? VACATED & REMANDED)"

2/ Bance, 38 F.3d at 105 (QUOTING FARMER 511 U.S. AT 843 N.8
11/4/96) (NEVERTHELESS EVEN UNDER THIS SUBJECTIVE STANDARD
A PRISON OFFICIAL CANNOT HIDE BEHIND AN EXCUSE THAT HE WAS
UNWARE OF A RISK NO MATTER HOW OBVIOUS)"

3/ ESTEVESON vs. ANDERSON, 388 F.3d 263, 272 / 7th Cir. 2008 (CORRECTIONAL
OFFICIALS HAVE CONSTITUTIONAL DUTY TO PROTECT INMATE FROM VIOLENCE)"

4/ ADIB Eddie Ramirez MARRIQUIN vs. L.T. FIELDS 789 F.3d 126 /

MARCH 18, 2015 (COURT OF APPEAL THOSE WHO HOLD THAT THE SUBJECTIVE
ACTUAL KNOWLEDGE STANDARD REQUIRED TO FIND 8th AMENDMENT
DELIBERATE INDIFFERENCE MAY BE PROVEN BY CIRCUMSTANTIAL EVIDENCE
THAT A RISK WAS SO OBVIOUS THAT IT HAD TO HAVE BEEN KNOWN.
VACATED & REMANDED)"

[Handwritten signature]

V.

5/ J.R.J AND M. J. J. VS. POLES COUNTY AND DARYL H. CHRISTENSEN

960 F.3d 367 U.S. COURT OF APPEALS 9TH CIRCUIT 5/15/20

"(4) DAMAGES AWARDED \$2 million COMPENSATORY DAMAGES
\$3.25 million PUNISHMENT COURT OF APPEALS CIRCUIT JUDGE SCUNDR
ON REHEARING EN BANC: (1) JUDGE ACTED WITH DELIBERATE INDIFFERENCE
TO JAIL INMATE SAFETY AND VIOLATED 8TH AMENDMENT;

(2) EVIDENCE SUFFICIENT TO SUPPORT COURT'S LIABILITY UNDER §1983;

6/ SMITH VS. COCHRAN 339 F.3d 1008 / NO. 01-5085 (10TH CIR. 8/12/03)

"(COURT OF APPEALS CIRCUIT JUDGE EBEL: (1) EXAMINERS ALLEGED
SEXUAL CONTACTS WITH INMATE DEMONSTRATED USE EXCESSIVE FORCE
AND MALICE SUFFICIENT TO IMPLICATE AN 8TH AMENDMENT;

(2) STATE DOC. DELEGATED IT'S PENOLOGICAL SUPERVISORY AUTHORITY
AFTER WORK RELEASE INMATE SO THAT CENTERS SUPERVISORY
PERSONNEL BARE DUTY UNDER 8TH AMENDMENT TO REFRAIN FROM
USING EXCESSIVE FORCE AGAINST INMATE; (3) ALLEGED NON
CONSENSUAL SEX BETWEEN INMATE (EXAMINERS VIOLATED CLEARLY
ESTABLISHED FEDERAL LAW? THUS EXAMINER WAS NOT
ENTITLED TO QUALIFIED IMMUNITY);

7/ NOVATER VS. ROBINSON F.3d 1003, 1068 (10TH CIR. 1998)

"(AN INMATE HAS A CONSTITUTIONAL RIGHT TO BE SECURE IN HER
BODILY INTEGRITY & FREE FROM ATTACK BY PRISON GUARDS)"

8/ BARNEY VS. PULSIPHER 143 F.3d 1299, 1310 (10TH CIR. 1998)

"(PLAINTIFF DEPRIVATIONS RESULTING FROM THE SEXUAL ASSAULTS
ARE SUFFICIENTLY SERIOUS TO CONSTITUTE A VIOLATION UNDER THE
8TH AMENDMENT U.S.C.A.)"

litigated

VI.

Summary/

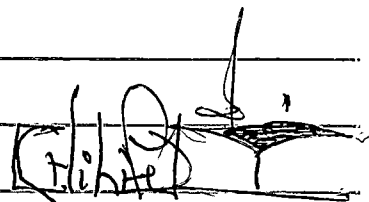
Appellant Humbly makes sic court of Appeals to a certain
Judge before Cist Benjamin #2161 1908 6/14/02

Granting Summary Judgment and vacate and Remand
Case to Lower Court for trial on this day of 3rd
Month of Dec, 2002

Respectfully Submitted

Abdullah Majid

Without Prejudice (10/1/02)

A handwritten signature and initials, possibly 'M. H. H.', written in dark ink at the bottom right of the page.

Free Shalio Martin Legal Defense Fund
HIGHLIGHTS PRESIDENT SHALIO L. A. MARTIN #19989
BRIEF W/INA Brown Bikes Rd. Col SC 29801
Vice President Kasemo Mseleja @mmail

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