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THE STATE OF SOUTH CAROLINA ("SC") **SC Court of Appeals** **No. 2022-000339**

In The Court of Appeals (as Transferred from the Supreme Court of South Carolina {"SC S Ct"})

APPEAL from RICHLAND COUNTY Court of COMMON PLEAS

D. Craig Brown, Circuit Court Judge, Case No. 2019-CP-40-01374,

Which is an Appeal from Richland County (Dentsville) Magistrate Phillip F. Newsom ("DMN") as transferred to Richland Count Magistrates from the City of Columbia' Municipal Court ("CMC") No. L066971

City of Columbia, SC,

Respondent,

v.

Marie Assa'ad-Faltas, MD, MPH,

Appellant.

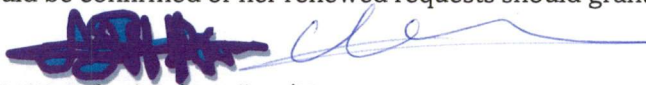
APPELLANT'S very grateful MOTION FOR partial CLARIFICATION of the third paragraph OF THIS COURT'S 17 November 2022 ORDER in this Case, OR, in the alternative, APPELLANT'S RENEWED MOTION to serve opposing counsel by e-mail UNDER THE UPDATED RULES, SCACR, AND OTHER RELEVANT COURT ORDERS

Appellant Marie Assa'ad-Faltas, MD, MPH *pro se* thanks the Court for *expressly* allowing her to *file* by e-mail and seeks clarification of ¶ 3 of this Court's 17 November 2022 ORDER in this case. She shall limit her *filing with this Court* to ctappfilings@sccourts.org but *assumes* she may also *serve* opposing counsel at his *current* e-mail address of marshall.james@columbiasc.gov or at such other email address as Mr. James or his successor as Respondent's counsel, if applicable, may designate.

The 17 November 2022 ORDER in this case, at ¶ 3, GRANTS Appellant's motion "to file, receive, and serve filings by e-mail" without limitation on the e-mail address she may use to *serve* opposing counsel; but the phrase "to the limited extent" in ¶ 3 creates doubt. Yet, since: (1) all statutes/court orders are construed by "intent over text," (2) the intent of this Court's kind grant to Appellant of leave to *file* by email is to reduce her fairly avoidable expenses and efforts in prosecuting this case to a just conclusion, (3) *filing* by e-mail while *servng* by *physical* paper reduces *only half* of Appellant's fairly avoidable expenses and efforts, and (4) opposing counsel should benefit from the word-searchability and "link-clickability" of documents *served* by e-mail as opposed to documents printed and served on *physical* paper, **Appellant construes ¶ 3 to also allow her to serve by e-mail and respectfully seeks clarification sufficiently in advance of the due date of her initial opening brief and designation of matter to confirm her understanding.** Alternatively, Appellant hereby *partially* renews her 31 October 2022 motion to: (1) *serve* by e-mail and (2) be served by e-mail at Marie.Faltas@hotmail.com as those parts of her said motion were not *expressly* denied or granted. Appellant also respectfully renews her undertaking to keep this Court's Clerk apprised of any change in Appellant's e-mail address or desire to be so served.

WHEREFORE, Appellant's understanding should be confirmed or her renewed requests should granted.

Sincerely submitted on 22 November 2022.



s/Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant/Movant *pro se*
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Certificate of Service by U.S. Mail and of Courtesy Service by e-mail

On 22 November 2022, I served Mr. Marshall James, sole Counsel for Respondent, with a true copy of this document by sufficient-postage-prepaid first-class U.S. mail properly addressed to him at **City of Columbia, Legal Dept., PO Box 667 Columbia SC 29202**, and with a *courtesy copy* by e-mail at marshall.james@columbiasc.gov, all God so willing.



s/Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant/Movant/here server *pro se*
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