

THE STATE OF SOUTH CAROLINA

No. 2022-000339

In The Court of Appeals (as Transferred from the Supreme Court of South Carolina)

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

As transferred to Richland Count Magistrates from the City of Columbia' Municipal Court (CMC)

Summary Court No. L066971

City of Columbia, SC,

Respondent,

RECEIVED

v.

DEC 28 2022

Marie Assa'ad-Faltas, MD, MPH,

Appellant.

SC Court of Appeals

APPELLANT'S MOTION TO FILE REVISED INITIAL BRIEF.

Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") *pro se* prays this Court to accept her contemporaneously filed *revised* initial brief and shows that she was under order to file and serve her initial brief 30 days from this Court's 17 November 2022 ORDER which had allowed her to file by e-mail. A subsequent order withdrew that permission; so, Dr. Faltas was under the added time pressure to prepare, print, and hand-serve and hand-file her initial brief and designation of matter on Friday, 16 December 2022, which was really three calendar days, or one business day, before Monday, 19 December 2022. As that brief was substantial, many typographic errors and less-than-ideal stylistic choices were made and virtually impossible to be detected by one who proof-reads her own writings.

After the minimal time distance from the 16 December 2022 version, Dr. Faltas was able to re-read the brief with fresh eyes and make *non-substantive* changes which, hopefully, make it easier for this Court and Respondent's counsel to read and assess. This Court should take Dr. Faltas' perfectionism as more proof of her respect for the courts. The greater proof is her courage to submit innovative ideas.

Dr. Faltas did not consult Mr. James but expect no opposition from him and naturally consents to his time to respond running from today or from the date this Court grants this motion, whichever is later.

Sincerely submitted on 28 December 2022.



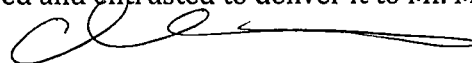
s/Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant *pro se*

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Certificate of Service Satisfying the Substance of Form 7 and of all Relevant Rules, SCACR

On 28 December 2022, I served Mr. Marshall James, sole Counsel for sole Respondent in this case, with a true copy of this document by going to City of Columbia's Legal Department's office location on Washington and Main Streets, Columbia, SC 29201, and there and then hand-delivering the true copy of this document to a person long known to me to be approved and entrusted to deliver it to Mr. Marshall, all God so willing.



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

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