

RECEIVED

DEC 28 2022

No. 2022-000339

THE STATE OF SOUTH CAROLINA

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,

v.

Marie Assa'ad-Faltas, MD, MPH,

Appellant.

**APPELLANT'S MOTION for Leave to File on a CD or USB OR for SCCOID to Undertake Printing only of ALL Appellant's Future Submission in this Important Case.**

Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") *pro se* prays this Court to view the reality of an almost-70-year-old disabled person who had to spent the last 14 years fending off many *already-proven-false* criminal charges against her but still needs to defeat the one underlying *this* case lest, if the underlying conviction stands, fabricators and framers will learn that if they lie and suborn perjury in ten cases, they will succeed in one. That would be a disaster for justice and society.

Dr. Faltas cannot *procedurally* seek rehearing of the order withdrawing her leave to file by e-mail but she can, and hereby does, suggest acceptable alternative **not barred** by any SC Supreme Court ("SC S Ct") order this Court may "right or wrong" deem itself bound by. Dr. Faltas again cites Rule 1, SCRCPC and the general approach to justice and adds that, in addition to cost considerations, the word-searchability, link-clickability, and color preservation of images, mitigate towards a form of digital filing. She therefore suggests that her future submissions be accepted, not on paper, but on CDs or USBs.

Alternatively, she asks that SCCOID be ordered to print her documents for her as such costs are allowed for *pro se* indigent parties under the Defense of Indigents Act, Dr. Faltas is indigent, and SCCOID has its own printing and binding equipment. In further support hereof, she shows that the Clerk of SC S Ct provides an innovative drive-by-filing option for disabled parties; *vide* attached letter from Ms. Howard.

Dr. Faltas did not consult Mr. James but expect no opposition from him as digital versions are easier for him to work with.

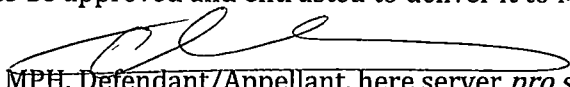
Sincerely submitted on 28 December 2022.



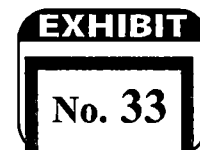
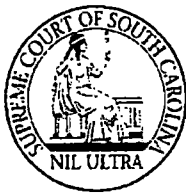
s/Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant *pro se*  
P.O. Box 9115, Columbia, SC 29209 Phone: (803) 783-4536 Cell: (330) 232-4164  
e-mail: [Marie.Faltas@hotmail.com](mailto:Marie.Faltas@hotmail.com) and [MarieAssaadFaltas@GMail.com](mailto:MarieAssaadFaltas@GMail.com)

**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*  
P.O. Box 9115, Columbia, SC 29209 Phone: (803) 783-4536 Cell: (330) 232-4164  
e-mail: [Marie.Faltas@hotmail.com](mailto:Marie.Faltas@hotmail.com) and [MarieAssaadFaltas@GMail.com](mailto:MarieAssaadFaltas@GMail.com)



## The Supreme Court of South Carolina

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December 13, 2022

Dr. Marie Assa'ad Faltas  
PO Box 9115  
Columbia SC 29290

Dear Dr. Assa'ad Faltas:

This responds to your correspondence dated December 5, 2022. Please understand that now that we have completed construction of the secure judicial parking lot and our gates are fully functional, no member of the public, disabled or otherwise, is allowed entry into the secure parking area. This policy must be strictly enforced to ensure the safety of the judiciary and court staff.

The Court is now in the planning stages for the construction of an ADA ramp at the front entrance of the Supreme Court building. The project has been approved, and we have been told that construction will begin in the next calendar year. Until that time, if you intend to hand-deliver filings with the Court, please call the main Supreme Court number ten minutes before you arrive at the building, and a staff member will meet you at the bottom of the stairs in front of the building to accept your filings. This Court will make the same accommodation for all individuals who are unable to navigate the stairs at the front of the building.

Very truly yours,

*Patricia A. Howard*  
CLERK