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Jan 26 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM BERKELEY COUNTY
Circuit Court**

**Jennifer McCoy
Circuit Court Judge**

Appellate Case No. 2022-000861

Stephen Woodard Respondent,

v.

Vermica GrantAppellant.

MOTION TO EXPEDITE AND FOR SANCTIONS

Pursuant to Rules 240 & 269, SCACR, Respondent Stephen Woodard moves to expedite the consideration of this appeal and to sanction the Appellant for her misconduct.

This is an appeal of a Rule to Vacate in a residential real estate eviction from a residence located at 115 Hayworth Road, Summerville, SC 29486. Respondent Stephen Woodard is the landlord and Appellant Vermica Grant is the tenant. According to the Magistrate’s Return:

Stephen Woodard filed a Rule to Vacate or Show Cause (Eviction) on April 18, 2022. The Rule to Vacate or Show Cause (Eviction) was signed by the Honorable William D. Wilson, Jr. Vermica Grant was being evicted for failure to pay rent when due or demanded in an undisclosed amount.

A Show Cause Hearing was not requested by Vermica Grant. Stephen Woodard filed the Writ of Ejectment on May 2, 2022. The Writ of Ejectment was served on May 5, 2022 at 9:52 am and was signed by the Honorable William D. Wilson, Jr. Vermica Grant filed an Appeal on May 6, 2022. The Bond-to-Stay Hearing was

scheduled on May 11, 2022 and heard by the Honorable Rad S. Deaton. Stephen Woodard appeared for the Bond-to-Stay Hearing in person. Vermica Grant attended remotely via telephone. Below is the outcome from the Bond-to-Stay hearing.

1. \$2,350.00 per month due on the 15 day of the month and late after the 5th of each month.

(Exhibit to Respondent's 07/28/2022 Motion to Dismiss).

According to a June 13, 2022, Order of Non-Compliance, Appellant did not post this bond. *Id.* Appellant, proceeding *pro se*, appealed the decisions of the Magistrate Court to the Circuit Court, and the Circuit Court affirmed by order dated June 16, 2022. *Id.*

Appellant, again proceeding *pro se*, served a notice of appeal on this Court on June 20, 2022. This notice was woefully deficient and met virtually none of the requirements of Rule 203, SCACR. Respondent appeared on July 28, 2022, and moved to dismiss Appellant's appeal, which this Court granted by order dated September 22, 2022.

Since dismissal and before this Court issued its remittitur, Appellant has presented this Court with multiple deficient filings. Some documents lacked necessary language. Other submissions lacked a filing fee. On July 22, 2022, Appellant attempted to change her mailing address for correspondence, but the new Sumter address given by her has what appears to be an incorrect zip code. Each one of these filings has further delayed the final resolution of this matter. As the Appellant has been the defendant in multiple eviction actions in Berkeley County (Exhibit A), Appellant's deficient filings appear to represent a calculated effort to delay this matter further and continue living rent-free at 115 Hayworth Road. This is further evidenced by Appellant's filing of what appears to be a *second* appeal of this matter, which this Court has given case number 2022-001822. As this appeal is not being conducted in good faith and in order to delay proceedings, sanctions are appropriate under Rule 269, SCACR.

Under normal circumstances, an appeal will not stay a writ of ejectment. Rule 241(b)(10), SCACR. However, the muddled nature of Appellant's filings in this matter have made the lower courts reluctant to proceed with eviction. As a result, Respondent has lost ten months of paid occupancy of his property. Thanks to Appellant's gamesmanship, she has also not paid rent since March of 2022, though she made a partial payment of \$1,650.00 in June of 2022. **Respondent would beg this Court order (if it does not immediately remit this case to the lower court) the Appellant immediately post bond for the past due rent of \$21,850.00, and pay and additional bond of \$2,350.00 on the 15th of each month. Respondent would also demand that any order setting bond clearly direct the lower courts to proceed with eviction if Appellant does not meet the bond obligation.**

Respondent would also beg this Court to proceed with all due haste, because Respondent's continued habitation of 115 Hayworth Road puts the safety of every person in that neighborhood in jeopardy. On February 24, 2022, May 10, 2022, and December 29, 2022, (during Appellant's tenancy) 115 Hayworth Road has been visited by law enforcement searching for, and finding, fugitives accused of attempted murder, conspiracy to commit murder, carjacking, and kidnapping. (Exhibit B).

Accordingly, the Respondent asks this Court to (1) issue the remittitur in this matter in an expedited manner, (2) order that the lower courts may proceed with eviction, unless Appellant post a significant bond, and (3) sanction the Appellant for her misuse of this Court.

Dated: 01/26/2022

/s/ Jason Scott Luck
Jason Scott Luck
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Bennettsville, SC 29512
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843.479.7222 (f)
jason@luck.law
Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
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EXHIBIT A – BERKELEY COUNTY PUBLIC INDEX



Berkeley County 9th Judicial Circuit Public Index



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Search By... Court Type: Court Agency:
 Case #: Case Type: Case SubType:
 Last Name/Business: First: Middle: Suffix: Party Type:
 Action Type: CDR Code: Indictment #:
 Date Type: Beginning: Ending:
 Tax Map# From: Through:
 Only for Civil Cases... Index Search All Lis Pendens Judgments | Cross Index Search All Judgment For Judgment Against
 | Name Search Option Begins With Contains

Name	Party Type	Case Number	Filed Date	Case Status	Disposition Date	Type	Subtype	Judgment #	Court Agency
Grant, Vermica	Appellant	2017CP0800029	01/05/2017	Dismissed	02/13/2017	Appeal	Magistrate Civil 910		Common Pleas
Grant, Vermica	Appellant	2017CP0801643	07/07/2017	Dismissed	09/06/2017	Appeal	Magistrate Civil 910		Common Pleas
Grant, Vermica	Defendant	2017CV0810602469	06/09/2017	Disposed	09/06/2017	Civil	Rule to Vacate \$40	2017CV0810602469	Goose Creek Magistrate
Grant, Vermica	Defendant	2018CV0810800581	12/17/2018	Writ of Ejectment	01/02/2019	Civil	Rule to Vacate \$40	2018CV0810800581	St. Stephen Magistrate
Grant, Vermica	Appellant	2020CP0801126	05/22/2020	Dismissed	07/20/2020	Appeal	Magistrate Civil 910		Common Pleas
Grant, Vermica	Appellant	2020CP0802685	12/16/2020	Dismissed	03/29/2021	Appeal	Magistrate Civil 910		Common Pleas
Grant, Vermica	Defendant	2020CV0810600098	01/07/2020	Settled	01/21/2020	Civil	Rule to Vacate \$40	2020CV0810600098	Goose Creek Magistrate
Grant, Vermica	Defendant	2020CV0810600708	02/10/2020	Settled	03/03/2020	Civil	Rule to Vacate \$40	2020CV0810600708	Goose Creek Magistrate
Grant, Vermica	Defendant	2020CV0810601230	02/27/2020	Disposed	06/15/2020	Civil	Claim & Delivery	2020CV0810601230	Goose Creek Magistrate
Grant, Vermica	Defendant	2020CV0810601231	02/27/2020	Disposed	06/15/2020	Civil	Claim & Delivery	2020CV0810601231	Goose Creek Magistrate
Grant, Vermica	Defendant	2020CV0810601232	02/27/2020	Disposed	06/15/2020	Civil	Claim & Delivery	2020CV0810601232	Goose Creek Magistrate
Grant, Vermica	Defendant	2020CV0810601320	03/09/2020	Disposed	05/20/2020	Civil	Rule to Vacate \$40	2020CV0810601320	Goose Creek Magistrate
Grant, Vermica	Defendant	2020CV0810602529	09/09/2020	Settled	07/30/2021	Civil	Rule to Vacate \$40	2020CV0810602529	Goose Creek Magistrate
Grant, Vermica	Defendant	2020CV0810603386	12/03/2020	Disposed	03/17/2021	Civil	Rule to Vacate \$40	2020CV0810603386	Goose Creek Magistrate
Grant, Vermica	Defendant	2021CV0810600107	01/11/2021	Disposed	03/08/2021	Civil	Claim & Delivery PS	2021CV0810600107	Goose Creek Magistrate
Grant, Vermica	Appellant	2022CP0801083	05/06/2022	Appeal	06/17/2022	Appeal	Magistrate Civil 910		Common Pleas
Grant, Vermica	Defendant	2022CV0810601201	04/18/2022	Disposed	05/02/2022	Civil	Rule to Vacate \$40	2022CV0810601201	Goose Creek Magistrate
Grant, Vermica	Defendant	2022CV0810700702	06/07/2022	Dismissed	12/12/2022	Civil	Summons & Complaint	2022CV0810700702	Small Claims South
Grant, Vermica S.	Appellant	2016CP0802449	10/17/2016	Dismissed	11/04/2016	Appeal	Magistrate Civil 910		Common Pleas
Grant, Vermica Shaunta	Defendant	2016CV0810400265	04/08/2016	Disposed	05/11/2016	Civil	Rule to Vacate \$40	2016CV0810400265	Moncks Corner Magistrate
Grant, Vermica Shaunta	Defendant	2016CV0810400426	06/08/2016	Disposed	07/07/2016	Civil	Rule to Vacate \$40	2016CV0810400426	Moncks Corner Magistrate
Grant, Vermica Shaunta	Defendant	2017A0810200236	04/17/2017	Disposed	06/14/2022	Criminal-Clerk			General Sessions
Grant, Vermica Shaunta	Defendant	2021A0820200008	01/25/2021	Dismissed	06/14/2022	Criminal-Clerk			General Sessions
Grant, Vermica Shaunta	Defendant	2021A0820200009	01/25/2021	Dismissed	06/14/2022	Criminal-Clerk			General Sessions
Grant, Vermica Shaunta	Defendant	2021A0820200010	01/25/2021	Dismissed	06/14/2022	Criminal-Clerk			General Sessions
Grant, Vermica Shaunta	Defendant	2021A0820200011	01/25/2021	Dismissed	06/14/2022	Criminal-Clerk			General Sessions
Grant, Vermica Shaunta	Defendant	2021A0820200012	01/25/2021	Dismissed	06/14/2022	Criminal-Clerk			General Sessions
Grant, Vermica Shaunta	Defendant	2021A0820200013	01/25/2021	Dismissed	06/14/2022	Criminal-Clerk			General Sessions
Grant, Vermica Shaunta	Defendant	2022CP0801421	06/16/2022	Judgment	06/16/2022	Common Pleas	Judgment/GS Judgment	2022CP0801421	Common Pleas
Grant, Vermica Shaunta	Defendant	G830633	09/15/2014	NRVC	10/29/2014	Traffic	Traffic		Central Criminal/Traffic

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Jennifer McCoy
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EXHIBIT B – POLICE REPORTS

AGENCY I.D.
SC0080000

INCIDENT REPORT
Berkeley County Sheriffs Office
APPROVED (Sergeant Timothy Ham)

CASE NUMBER
202202001713

NCIC
INQ. ENTD.

EVENT	INCIDENT TYPE		COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM						
	1. Agency Assist - Goose Creek PD		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	20(Residence/Home)		<input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Ins <input checked="" type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.						
	2.		<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO									
VICTIM NO. 1	INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)				ZIP CODE	WEAPON TYPE							
	115 HAYWORTH RD, SUMMERVILLE, SC				29486-								
	INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME 24 HR. CLOCK		LOCATION NO.					
	02/24/2022	16:41		02/24/2022	16:45	DISP. DATE	DISP. TIME	TIME ARRIVED	DEPART. TIME				
	COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE			
			#1	#2	#3	* J S O U				D E			
	ADDRESS		CITY		STATE	ZIP CODE	LOCATION NO.						
	VICTIM'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE			
	Goose Creek PD		#1	#2	#3	* O S O U				(843) 572-4300			
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARTIES, ETC.								
ADDRESS		CITY		STATE	ZIP CODE	LOCATION NO.							
519 N GOOSE CREEK BLVD		Goose Creek		SC	29445-								
VISIBLE INJURY (VICT. 1)		<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> EXPLAIN -		COMPLAINT OF NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									
VICTIM (NO. 1):		NONE <input checked="" type="checkbox"/>		USING: ALCOHOL <input type="checkbox"/>		DRUGS <input type="checkbox"/>		TYPE:					
TWO-MAN VEH. <input type="checkbox"/>		ONE-MAN VEH. <input type="checkbox"/>		DETECTIVE/SPLASMT. <input type="checkbox"/>		OTHER <input type="checkbox"/>		ALONE <input type="checkbox"/>					
								ASSISTED <input type="checkbox"/>					
								* J -- This Jurisdiction S -- State O -- Out of State U -- Unknown					
SUBJECT NO. 1	<input type="checkbox"/> SUSPECT	NAME, (LAST, FIRST, MIDDLE)		RACE	SEX	AGE	ETH.	DATE OF BIRTH	HEIGHT	WEIGHT	HAIR	EYES	
	<input type="checkbox"/> RUNAWAY			B	M	15	N		5'07"	150	BLK - Blac	BRO - Bro	
	<input type="checkbox"/> WANTED	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARTIES, ETC.											
	<input type="checkbox"/> WARRANT												
	<input type="checkbox"/> ARREST	ADDRESS		CITY		STATE	ZIP CODE	LOCATION NO.					
	<input type="checkbox"/> JAIL												
	<input type="checkbox"/> SUMMONS	SUBJECT (NO. 1) USING: ALCOHOL <input type="checkbox"/>		COMPUTER EQUIP. <input type="checkbox"/>		ARRESTED NEAR OFFENSE SCENE <input type="checkbox"/>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		DATE/TIME OF OFFENSE		DATE/TIME OF ARREST	
		DRUGS <input type="checkbox"/>		NONE <input checked="" type="checkbox"/>		TOTAL # ARRESTED		0		02/24/2022 16:41			
NARRATIVE	CFS # 2022-027649												
	On 2/24/2022 units responded to 115 Hayworth Road in reference to a disturbance with a wanted subject. This incident occurred in the Summerville area of Berkeley County.												
	Upon arrival units cleared the residence and located the subject identified as [REDACTED]												
	The subject is wanted for attempted murder by Goose Creek Police Department. Subject [REDACTED] was transported to the detention center where he was served his warrants.												
	Nothing further.												
				JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY				JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY					
PROPERTY EST.	TYPE (GROUP)											TOTAL VALUE	
	STOLEN												
	DAMAGED												
	BURNED												
	RECOVERED												
	SEIZED												
	COUNTERFEIT												
ADMINISTRATIVE	SUBJECT IDENTIFIED		SUBJECT LOCATED		<input type="checkbox"/> ACTIVE <input checked="" type="checkbox"/> ADM. CLOSED		<input checked="" type="checkbox"/> ARRESTED UNDER 18		<input checked="" type="checkbox"/> EX-CLEAR UNDER 18				
	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> UNFOUNDED		<input type="checkbox"/> ARRESTED 18 AND OVER		<input type="checkbox"/> EX-CLEAR 18 AND OVER				
	REASON FOR EXCEPTIONAL CLEARANCE: 1. <input type="checkbox"/> OFFENDER DEATH 2. <input type="checkbox"/> NO PROSECUTION 3. <input checked="" type="checkbox"/> EXTRADITION DENIED 4. <input type="checkbox"/> VICTIM DECLINES COOPERATION 5. <input type="checkbox"/> JUVENILE - NO CUSTODY												
	REPORTING OFFICER(S)		DATE	UNIT NUMBER	APPROVING OFFICER		DATE	UNIT NUMBER					
	7236 - PFC Brittany Butler		02/24/2022	7236	4889 - Sergeant Timothy Ham		03/01/2022						
FOLLOW-UP INVESTIGATION OFFICER													
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO													

AGENCY I.D.
SC0080000

INCIDENT REPORT
Berkeley County Sheriffs Office
APPROVED (Sergeant Timothy Ham)

CASE NUMBER
202205004215

NCIC
INQ. ENTD.

EVENT	INCIDENT TYPE		COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM								
	1. Agency Assist - Agency Assist		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	20(Residence/Home)		<input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Ins <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input checked="" type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.								
	2.		<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO											
VICTIM NO. 1	3.		<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO											
	INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)				ZIP CODE	WEAPON TYPE									
	115 HAYWORTH RD, SUMMERVILLE, SC				29486-										
	INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME 24 HR. CLOCK		LOCATION NO.							
	05/10/2022	9:39		05/10/2022	9:58	DISP. DATE	DISP. TIME	TIME ARRIVED	DEPART. TIME						
						05/10/2022	9:42	9:51	10:36						
	COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)			RELATIONSHIP TO SUBJECT	RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE	EMPLOYER PHONE				
	Simms, Tiara				* J S O U	B	F	00							
	ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.								
	VICTIM'S NAME (LAST, FIRST, MIDDLE)			RELATIONSHIP TO SUBJECT	RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE	EMPLOYER PHONE				
			#1 #2 #3	* J S O U											
HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARTIES, ETC.											
ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.									
VISIBLE INJURY (VICT. 1) <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> EXPLAIN -									COMPLAINT OF NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO						
VICTIM (NO. 1): NONE <input checked="" type="checkbox"/> USING: ALCOHOL <input type="checkbox"/> DRUGS <input type="checkbox"/> TYPE:															
TWO-MAN VEH. <input type="checkbox"/> ONE-MAN VEH. <input type="checkbox"/> DETECTIVE/SPLASMT. <input type="checkbox"/> OTHER <input type="checkbox"/> ALONE <input type="checkbox"/> ASSISTED <input type="checkbox"/> * J -- This Jurisdiction S -- State O -- Out of State U -- Unknown															
SUBJECT NO. 1	<input checked="" type="checkbox"/> SUSPECT	NAME, (LAST, FIRST, MIDDLE)			RACE	SEX	AGE	ETH.	DATE OF BIRTH	HEIGHT	WEIGHT	HAIR	EYES		
	<input type="checkbox"/> RUNAWAY				B	F	15	N		5'01"	120	BRO - Bro	BRO - Bro		
	<input type="checkbox"/> WANTED	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARTIES, ETC.													
	<input type="checkbox"/> WARRANT														
	<input type="checkbox"/> ARREST	ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.							
	<input type="checkbox"/> JAIL														
<input type="checkbox"/> SUMMONS	SUBJECT (NO. 1) USING: ALCOHOL <input type="checkbox"/> COMPUTER EQUIP. <input type="checkbox"/> DRUGS <input type="checkbox"/>			ARRESTED NEAR OFFENSE SCENE	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DATE/TIME OF OFFENSE		DATE/TIME OF ARREST							
			NONE <input checked="" type="checkbox"/>	TOTAL # ARRESTED	0		05/10/2022 9:39								
NARRATIVE	CFS # 2022-065049														
	On 5/10/2022 I, PFC. Damico responded to 115 Hayward Road within Berkeley County in reference to a runaway juvenile being reported by their mother (Tiara Simms) to be living in the attic of the residence. Upon arriving on scene, I made contact with the owner of the home (Vermica Grant) and advised her that I was there looking for the juvenile, and had information that she may be inside. Mrs. Grant gave law enforcement permission to enter her residence and look for the juvenile. Upon entering the residence, I made my way up the stairs and found the attic access door to be open. Deputy rogers gave call outs for whoever may be up there to come down. While Deputy Rogers gave call outs, I searched an open area around the corner and located the juvenile hiding behind a recliner. The juvenile was placed into custody due to a full extradition order out of Cobb County Georgia. The juvenile was transported to DJJ. Nothing further.														
	JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY						JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY								
	PROPERTY EST.														
	TYPE (GROUP)	TOTAL VALUE													
	STOLEN														
	DAMAGED														
	BURNED														
	RECOVERED														
SEIZED															
COUNTERFEIT															
ADMINISTRATIVE	SUBJECT IDENTIFIED			SUBJECT LOCATED			<input type="checkbox"/> ACTIVE <input type="checkbox"/> ADM. CLOSED			<input checked="" type="checkbox"/> ARRESTED UNDER 18			<input type="checkbox"/> EX-CLEAR UNDER 18		
	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			<input type="checkbox"/> UNFOUNDED			<input type="checkbox"/> ARRESTED 18 AND OVER			<input type="checkbox"/> EX-CLEAR 18 AND OVER		
	REASON FOR EXCEPTIONAL CLEARANCE: 1. <input type="checkbox"/> OFFENDER DEATH 2. <input type="checkbox"/> NO PROSECUTION 3. <input type="checkbox"/> EXTRADITION DENIED 4. <input type="checkbox"/> VICTIM DECLINES COOPERATION 5. <input type="checkbox"/> JUVENILE - NO CUSTODY														
	REPORTING OFFICER(S)			DATE	UNIT NUMBER	APPROVING OFFICER			DATE	UNIT NUMBER					
7100 - PFC Brandon Damico			05/10/2022		4889 - Sergeant Timothy Ham			05/10/2022							
FOLLOW-UP INVESTIGATION OFFICER															
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO															

AGENCY I.D.
SC0080000

INCIDENT REPORT
Berkeley County Sheriffs Office
APPROVED (Administrative Specialist 4 Stephanie Prine)

CASE NUMBER
202212012114

NCIC
INQ. ENTD.

EVENT	INCIDENT TYPE					COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM <input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Ins <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input checked="" type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.					
	1. Agency Assist - Agency Assist-US Marshalls Task Force					<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO								
	2.					<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO								
	3.					<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO								
INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)					ZIP CODE		WEAPON TYPE								
115 HAYWORTH RD, SUMMERVILLE, SC					29486-										
INCIDENT DATE		24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME		24 HR. CLOCK	LOCATION NO.						
12/29/2022		14:19		12/29/2022	15:30	DISP. DATE	DISP. TIME	TIME ARRIVED	DEPART. TIME						
						12/29/2022	14:19	14:36	14:51						
COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)					RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE	EMPLOYER PHONE		
					#1	#2	#3	* J S O U							
ADDRESS					CITY		STATE	ZIP CODE	LOCATION NO.						
VICTIM NO. 1	VICTIM'S NAME (LAST, FIRST, MIDDLE)					RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE	EMPLOYER PHONE	
						#1	#2	#3	* J S O U						
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.										
ADDRESS					CITY		STATE	ZIP CODE	LOCATION NO.						
VISIBLE INJURY (VICT. 1) <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> EXPLAIN -										COMPLAINT OF NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
VICTIM (NO. 1): NONE <input type="checkbox"/> USING: ALCOHOL <input type="checkbox"/> DRUGS <input type="checkbox"/> TYPE:															
TWO-MAN VEH. <input type="checkbox"/>		ONE-MAN VEH. <input type="checkbox"/>		DETECTIVE/SPLASMT. <input type="checkbox"/>		OTHER <input type="checkbox"/>		ALONE <input type="checkbox"/>		ASSISTED <input type="checkbox"/>		* J -- This Jurisdiction S -- State O -- Out of State U -- Unknown			
SUBJECT NO. 1	<input type="checkbox"/> SUSPECT	NAME, (LAST, FIRST, MIDDLE)					RACE	SEX	AGE	ETH.	DATE OF BIRTH	HEIGHT	WEIGHT	HAIR	EYES
	<input type="checkbox"/> RUNAWAY	Simmons, Dayvon JaQuin					B	M	20	N		5'11"	151	BLK - Blac	BRO - Bro
	<input checked="" type="checkbox"/> WANTED	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.													
	<input type="checkbox"/> WARRANT	ADDRESS					CITY		STATE	ZIP CODE	LOCATION NO.				
	<input checked="" type="checkbox"/> ARREST														
	<input type="checkbox"/> JAIL	SUBJECT (NO. 1) USING: ALCOHOL <input type="checkbox"/> COMPUTER EQUIP. <input type="checkbox"/>					ARRESTED NEAR OFFENSE SCENE <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>		DATE/TIME OF OFFENSE		DATE/TIME OF ARREST				
<input type="checkbox"/> SUMMONS	DRUGS <input type="checkbox"/>					NONE <input checked="" type="checkbox"/>		TOTAL # ARRESTED 2		12/29/2022 14:19		12/29/2022 14:30			
NARRATIVE	CFS # 2022-187382														
	On December 29, 2022, the USMS Carolinas Regional Fugitive Task Force, Charleston Division, along with the Berkeley County Sheriff's Office K-9 Unit Sgt. Segars and Cpl. Santos located and arrested fugitive SIMMONS, Dayvon and OATES, Tahaj. In which both suspects were wanted by the Orangeburg South Carolina Sheriff's Department for OATES for Murder and SIMMONS, Dayvon for Conspiracy to Commit Murder, CarJacking and Kidnapping.														
	It was discovered that OATES and SIMMONS are first cousins, and both have relatives in the Ladson area, [REDACTED]. On 12-22-2022 contact was made with Lotaya Simmons (Aunt) and Shady Little (mother to SIMMONS) who stated that they had not seen OATES or SIMMONS and that their whereabouts are unknown. Furthermore, Ms. Simmons stated the last known information														
	JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY							JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY							
	PROPERTY EST.														
	TYPE (GROUP)											TOTAL VALUE			
STOLEN															
DAMAGED															
BURNED															
RECOVERED															
SEIZED															
COUNTERFEIT															
SUBJECT IDENTIFIED		SUBJECT LOCATED		<input type="checkbox"/> ACTIVE <input type="checkbox"/> ADM. CLOSED		<input checked="" type="checkbox"/> ARRESTED UNDER 18		<input type="checkbox"/> EX-CLEAR UNDER 18							
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> UNFOUNDED		<input checked="" type="checkbox"/> ARRESTED 18 AND OVER		<input type="checkbox"/> EX-CLEAR 18 AND OVER							
REASON FOR EXCEPTIONAL CLEARANCE: 1. <input type="checkbox"/> OFFENDER DEATH 2. <input type="checkbox"/> NO PROSECUTION 3. <input type="checkbox"/> EXTRADITION DENIED 4. <input type="checkbox"/> VICTIM DECLINES COOPERATION 5. <input type="checkbox"/> JUVENILE - NO CUSTODY															
REPORTING OFFICER(S)				DATE	UNIT NUMBER	APPROVING OFFICER				DATE	UNIT NUMBER				
4278 - Sergeant Kim Milks				12/29/2022		3250 - Administrative Specialist 4 Stephani				01/25/2023					
FOLLOW-UP INVESTIGATION OFFICER															
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO															

AGENCY I.D.
SC0080000

SUPPLEMENTAL INCIDENT REPORT
Berkeley County Sheriffs Office

CASE NUMBER
202212012114

NCIC
INQ. ENTD.

ORIGINAL REPORT
 SUPPLEMENTAL REPORT
 ADDITIONAL VICTIMS
 ADDITIONAL STOLEN PROPERTY
 PAGE 2 of 4 PAGES
 MODIFIES ORIGINAL
 CASE STATUS CHANGE
 ADDITIONAL OFFENDERS
 ADDITIONAL RECOVERED PROPERTY

VICT./SUBJ. I.D. OVERFLOW

COMPLAINTANT NAME (LAST, FIRST, MIDDLE) [REDACTED] VICTIM RELATIONSHIP TO SUBJECT #1 #2 #3 RESIDENT * J S O U RACE B SEX M AGE 15 D.O.B. [REDACTED] ETH [REDACTED]
 VICTIM # [REDACTED]
 SUBJECT # 2 HEIGHT [REDACTED] WEIGHT [REDACTED] HAIR BLK - Black EYES BRO - Brown FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARTIES, ETC. [REDACTED]
 RUNAWAY
 WANTED
 WARRANT
 ARREST
 JAIL
 SUMMONS
 ADDRESS [REDACTED] CITY [REDACTED] STATE [REDACTED] ZIP CODE [REDACTED] LOCATION NO. [REDACTED] HOME PHONE [REDACTED] EMPLOYER PHONE [REDACTED]
 VICTIM NO. [REDACTED] VISIBLE INJURY: NO YES COMPLAINT OF NON-VISIBLE INJURIES NO YES VICTIM USING ALCOHOL: NONE TWO-MAN VEHICLE DETECTIVE/SPLASMT ALONE
 EXPLAIN [REDACTED] DRUGS: ONE-MAN VEHICLE OTHER ASSISTED
 SUBJECT NO. 2 USING: ALCOHOL DRUGS TYPE: [REDACTED]
 COMPUTER EQUIP. NONE

VICT./SUBJ. I.D. OVERFLOW

COMPLAINTANT NAME (LAST, FIRST, MIDDLE) VIA, BC1602 VICTIM RELATIONSHIP TO SUBJECT [REDACTED] RESIDENT * J S O U RACE [REDACTED] SEX [REDACTED] AGE [REDACTED] D.O.B. [REDACTED] ETH [REDACTED]
 VICTIM # [REDACTED]
 SUBJECT # [REDACTED]
 RUNAWAY
 WANTED
 WARRANT
 ARREST
 JAIL
 SUMMONS
 ADDRESS [REDACTED] CITY [REDACTED] STATE [REDACTED] ZIP CODE [REDACTED] LOCATION NO. [REDACTED] HOME PHONE [REDACTED] EMPLOYER PHONE [REDACTED]
 VICTIM NO. [REDACTED] VISIBLE INJURY: NO YES COMPLAINT OF NON-VISIBLE INJURIES NO YES VICTIM USING ALCOHOL: NONE TWO-MAN VEHICLE DETECTIVE/SPLASMT ALONE
 EXPLAIN [REDACTED] DRUGS: ONE-MAN VEHICLE OTHER ASSISTED
 SUBJECT NO. [REDACTED] USING: ALCOHOL DRUGS TYPE: [REDACTED]
 COMPUTER EQUIP. NONE

NARRATIVE

was that OATES was known to be with SIMMONS.

On 12-27-2022, Sgt. Milks began reviewing the social media sources for both OATES and SIMMONS and it was discovered that both suspects have common associates in the Summerville area of Berkeley County, Tierra Sims. It was also learned through the Berkeley County Dispatch Center that this common associate, Tierra Sims resides at 115 Hayworth Road in the Summerville area. That this address has had multiple law enforcement agency's arrests in at this residence reference to fugitives hiding at this address in the year of 2022.

VEH./GUN/JECT

STATUS STOLEN TYPE VEHICLE
 RECOVERED GUN
 FOUND BOAT
 TOWED LICENSE PLATE
 SUSPECT SECURITIES/BONDS, STOCKS
 VICTIM ARTICLE
 VIN AND/OR LICENSE NO. [REDACTED] BOAT HULL NO. AND/OR REG. NO. [REDACTED]
 SERIAL AND/OR OWNER APPLIED NO. [REDACTED] STATE [REDACTED]
 YEAR OF REGISTRATION [REDACTED] YEAR OF EXPIRATION [REDACTED] YEAR [REDACTED] MAKE [REDACTED] TYPE [REDACTED]
 MODEL [REDACTED] STYLE [REDACTED] COLOR [REDACTED] BRAND NAME [REDACTED] CALIBER [REDACTED]
 NIC NO. [REDACTED] DENOMINATION [REDACTED] ISSUER [REDACTED] SECURITIES DATE [REDACTED]
 MISCELLANEOUS [REDACTED]

PROPERTY EST.

TYPE (GROUP)	STOLEN	DAMAGED	BURNED	RECOVERED	SEIZED	COUNTERFEIT	TOTAL VALUE
STOLEN							
DAMAGED							
BURNED							
RECOVERED							
SEIZED							
COUNTERFEIT							

ADMINISTRATIVE

SUBJECT IDENTIFIED SUBJECT LOCATED ACTIVE ADM. CLOSED ARRESTED UNDER 18 EX-CLEAR UNDER 18
 YES NO YES NO UNFOUNDED ARRESTED 18 AND OVER EX-CLEAR 18 AND OVER
 REASON FOR EXCEPTIONAL CLEARANCE: 1. OFFENDER DEATH 2. NO PROSECUTION 3. EXTRADITION DENIED 4. VICTIM DECLINES COOPERATION 5. JUVENILE - NO CUSTODY
 REPORTING OFFICER(S) 4278 - Sergeant Kim Milks DATE 12/29/2022 UNIT NUMBER [REDACTED] APPROVING OFFICER 3250 - Administrative Specailist 4 Stephani DATE 01/25/2023 UNIT NUMBER [REDACTED]
 FOLLOW-UP INVESTIGATION OFFICER [REDACTED] YES NO

AGENCY I.D.
SC0080000

SUPPLEMENTARY INCIDENT REPORT
Berkeley County Sheriffs Office

CASE NUMBER
202212012114

NCIC
INQ. ENTD.

<input type="checkbox"/> ORIGINAL REPORT	<input type="checkbox"/> SUPPLEMENTAL REPORT	<input type="checkbox"/> ADDITIONAL VICTIMS	<input type="checkbox"/> ADDITIONAL STOLEN PROPERTY	PAGE <u>3</u> of <u>4</u> PAGES
<input type="checkbox"/> MODIFIES ORIGINAL	<input type="checkbox"/> CASE STATUS CHANGE	<input type="checkbox"/> ADDITIONAL OFFENDERS	<input type="checkbox"/> ADDITIONAL RECOVERED PROPERTY	

On 12-29-2022, the Carolinas Regional Fugitive Task Force began conducting surveillance at this location. At approximately 1415 hours, SIMMONS was observed getting into the trunk area of a 2022 Outlander SC tag: VSG575. This vehicle was driven by Tevin Stevens, who is a relative to SIMMONS. After conducting a short moving surveillance with the listed vehicle,

with the assistance of the Berkeley County Sheriff's Office K-9 Unit, a traffic stop was conducted at 1120 North Main Street in the Summerville area. SIMMONS was identified and arrested.

Carolinas Regional Fugitive Task Force members and Berkeley County Sheriff's Office K-9 units then made contact at 115 Hayworth Road, and it was at time, [REDACTED] surrendered and exited the front door of the residence and was arrested.

Sgt. Milks obtained a search warrant for the residence and executed by Sgt. Milks and Sgt. Leonard Cain of the Orangeburg County Sheriff's Office. One item seized, iPhone belonging to [REDACTED] recovered by Sgt. Cain. Who took possession of item. Sgt. Cain took custody of both SIMMONS and OATES and transported them to the Orangeburg County Sheriff's Office.

Copy of the search warrant and items seized list left at the residence and the original search warrant was returned to the Magistrate Court at 223 Live Oak Drive, Moncks Corner, SC.

Case cleared by arrest.

NARRATIVE

ADMINISTRATIVE	SUBJECT IDENTIFIED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		SUBJECT LOCATED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> ACTIVE	<input type="checkbox"/> ADM. CLOSED	<input checked="" type="checkbox"/> ARRESTED UNDER 18	<input type="checkbox"/> EX-CLEAR UNDER 18
					<input type="checkbox"/> UNFOUNDED		<input checked="" type="checkbox"/> ARRESTED 18 AND OVER	<input type="checkbox"/> EX-CLEAR 18 AND OVER
	REASON FOR EXCEPTIONAL CLEARANCE: 1. <input type="checkbox"/> OFFENDER DEATH 2. <input type="checkbox"/> NO PROSECUTION 3. <input type="checkbox"/> EXTRADITION DENIED 4. <input type="checkbox"/> VICTIM DECLINES COOPERATION 5. <input type="checkbox"/> JUVENILE - NO CUSTODY							
REPORTING OFFICER(S)			DATE	UNIT NUMBER	APPROVING OFFICER		DATE	UNIT NUMBER
4278 - Sergeant Kim Milks			12/29/2022		3250 - Administrative Specailist 4 Stephani		01/25/2023	
FOLLOW-UP INVESTIGATION OFFICER <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								

RECEIVED

Jan 26 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM BERKELEY COUNTY
Circuit Court
Jennifer McCoy
Circuit Court Judge**

Appellate Case No. 2022-000861

Stephen Woodard Respondent,

v.

Vermica GrantAppellant.

CERTIFICATE OF SERVICE

I certify I have served the Motion to Expedite and for Sanctions by depositing a copy of the same in the United States Mail, First Class, postage prepaid, on January 26, 2023, addressed to Vermica Grant, 115 Hayworth Road, Summerville, SC 29486.

Dated: 01/26/2023

/s/ Jason Scott Luck
Jason Scott Luck
P.O. Box 47
Bennettsville, SC 29512
843.479.6863 (o)
843.479.7222 (f)
jason@luck.law
Attorney for Respondent

JASON SCOTT LUCK

ATTORNEY AT LAW

**P.O. BOX 47 (107 S. PARSONAGE ST.)
BENNETTSVILLE, SC 29512
843.479.6863**

26 January 2023

RECEIVED

Jan 26 2023

SC Court of Appeals

S.C. Court of Appeals
ATTN: Clerk / Filings
P.O. Box 11629
Columbia, SC 29211

Re: Woodard v. Grant, 2022-000861
Woodard v. Grant, 2022-001822

Dear Clerk:

Please find enclosed the \$50.00 fee for Respondent's Motion to Expedite and for Sanctions in case 2022-000861 and the \$50.00 fee for Respondent's Motion to Expedite and Consolidate in case 2022-001822. Both of these motions were filed electronically on January 26, 2023.

Please do not hesitate to contact me with any questions.

With Kind Regards,



Jason Scott Luck

/JSL
Enclosures