

THE SOUTH CAROLINA COURT OF APPEALS

T. Terrell Bryan,

Appellant,

v.

SCDC,

Respondent.

The Honorable Shirley C. Robinson
Administrative Law Court
Grie. No. PCI 0309-12
ALC Docket No. 13-ALJ-04-017
Appellate Case No. 2013-000750

RECEIVED

JUN 03 2013

SC Court of Appeals

MOTION TO STRIKE & INJUNCTION

Appellant moves to strike the "Initial Brief of Respondent" & Injunctive relief for Respondent's Counsel to uphold access policy & states:

STRIKE

1. Respondent alleges that "[t]he property inventory ~~does not~~ done at both institutions reflect that appellant's property consisted of the same items." **THIS IS NOT TRUE.** Moreover, the 6 items listed in "Respondent's Designation of Matter to be included in the Record on Appeal" Respondent did not provide me a copy of. Further, the property inventory form (19-2) in question has to be dated 1/23/12. Not August 10, 2012 as Respondent alleges. 1/23/12 is the date I came to Perry C.I. it would show what all I had before my property was taken on 1/26/13, as stated in my step 1 grievance. Respondent in bad Faith is trying to confuse the dates & has not provided me the 6 items. Where is the 1/24/13 19-2?
2. **WHEREFORE,** I move the Court to strike Respondent's Brief & grant Full relief &/or Compel Respondent to produce to me the 6 items & the 1/23/12 & 1/26/12 19-2, which 1/23/12 is the date I came to Perry C.I. as stated in my step 1 grievance, &/or to be given a hearing where I can be heard orally to clarify. Upon receipt of 6 items plus 1/23/12 & 1/26/12 19-2 to be given 30 days to submit a Reply Brief, Where the record is not clear as to what 19-2 is relevant! see attached Request to: Property Control.

INJUNCTION

3. Appellant has a right to submit a Reply Brief, therefore, this matter falls under the purview of a court deadline. I have argued back & forth with SCDC staff Attorney Chris Florian & Respondent's Counsel for months about policy GA-01.03 § 9.2, where if I show a court deadline lawbooks would be delivered within one working day. Chris Florian & Respondent's Counsel has advised Corp. P. Morton to deliver lawbooks only once a week & we only get one hour a week on the computer to do legal research. I need Respondent to provide me lawbooks as stated in their own policy or afford me more computer access.

4. WHEREFORE, I move this court to issue an order directing Counsel Ms. Shanika K. Johnson to consult with her client about affording me more access per their own policy & to submit an affidavit stating action taken. Noting this case has merit, I have a property interest where I allege I lost property. **PROPERTY MEAN PROPERTY!** It's my property, therefore I have an interest in my own property.

5/29/13, SC
dated

Without prejudice,
X. T. Terrell Bryan, all rights reserved,
T. Terrell Bryan
#254538 SPN-B19, MCC1
386 Redemption Way
McCormick, SC 29899

CERTIFICATE OF SERVICE

I hereby certify that I served this on: Shanika K. Johnson; 4444 Broad River Rd.; Columbia, SC 29210.

REQUEST

Property Control
Teren Bryan
MCCI

8/28/13
254538
SMU-B19

Please provide me a copy of the AUGUST 10, 2012; 1/23/12 & 1/26/12 19-2
Forms.

CC: ON FILE