

BEFORE THE SUPREME COURT ("S Ct") OF SOUTH CAROLINA ("SC")

Appellate Cases Nos. 2023-00-----, 2023-00-----, 2023-00-----, and 2023-00-----.

AND STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE CIRCUIT COURT OF COMMON PLEAS  
On Applications for Post-Conviction Relief (PCR) Nos. 2019-CP-40-00112,  
2019-CP-40-02217, 2019-CP-40-02218, and 2019-CP-40-02219.

Marie Assa'ad-Faltas, MD, MPH

v.

State of South Carolina, and City of Columbia, SC

Amended Certificate of Applicant/Appellant's 3 March  
2023 Advisement to the Court and of Contemporaneous  
Timely NOTICES of Appeal in the above cases.

Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas"), reports that her projected service on Richland County Circuit Court of Common Pleas' ("RCCCCP") Clerk of Court ("CoC") on 3 March 2023 failed due to: (1) discordance between RCCCCP's CoC's and Dr. Faltas' clocks and (2) delays caused by snags in this Court's drive-by filing option for disabled parties until an ADA-ramp gets built at this Court's public access (of which there still are no signs 33 years after the ADA's enactment).

While Dr. Faltas renews her request to file by e-mail like all other parties before this Court, *pro se* or represented, and further shows that filing by e-mail would be a reasonable accommodation until, if ever, the ADA-compliant ramp gets built, she, in an abundance of caution, now, at great physical suffering to her ailing self and at unnecessary expense to her indigent self, shall, God willing, travel *again* this morning to RCCCCP's office first and attach herewith the clocked-in copies of the front pages of her notices of appeal and of her advisement in the above captioned cases. Dr. Faltas also notes that, had she been allowed to represent herself in the above-captioned cases, there would have been no notices of appeal *from her* as, by God's grace, she would have won here as done in 2017-CP-40-06831.

Dr. Assa'ad-Faltas' scruples, accuracy, and scholarship, stand in sharp contrast to the sloppiness of her forced (and now self-relieved) counsel Timothy Lee Griffith ("Griffith"), who, if having filed a motion to reconsider at all, filed without date, without rule reference, without certificates of service, without consulting with his client, and, crucially, apparently without sending any motion to the judge.

It is time for this Court to end Jim Crow revisited on Dr. Assa'ad-Faltas in pretense that some great but unexplained wisdom lay behind the prohibition on, and criminalization of, Dr. Assa'ad-Faltas' use of e-mail filing/service *available to all similarly-situated others*. **An overborne Dr. Assa'ad-Faltas and panderers may defer to this Court's oppressive whims; but History never will.**

Certificate of Submission AND Certificate of Service AND of Copies

Submitted and served by hand-delivery to SC Attorney General's ("SCAG") office at 1000 Assembly Street Columbia, SC 29201, and by hand-delivery to Richland County's Clerk of Court at 1701 Main Street Columbia, SC 29201, and courtesy-copied to: Griffith at [tgriffith@tgriffith.com](mailto:tgriffith@tgriffith.com), and to SCCOID at [hyoung@sccid.sc.gov](mailto:hyoung@sccid.sc.gov) and [hryan@sccid.sc.gov](mailto:hryan@sccid.sc.gov), and relevant others, all on 6 March 2023, and all God so willing.

S/Marie-Thérèse Assa'ad-Faltas, MD, MPH, Applicant-Appellant  
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