

THE STATE OF SOUTH CAROLINA

In the South Carolina Court of Appeals

APPEAL FROM GEORGETOWN COUNTY

Court of General Sessions

Honorable Judge Benjamin H. Culbertson, Circuit Judge

Case No. 22-000671

State

Respondent,

v.

Terron Dizzley,
Gwendolyn B. Frasier,
LaQuesha Felder,

Appellants,

**APPELLANT'S MOTION FOR LEAVE TO FILE ENLARGED
BRIEF UNDER RULES 208(b)(5) AND 234, SCACR**

The Appellants Terron Dizzley, Gwendolyn B. Frasier, and LaQuesha A. Felder, pursuant to Rules 208(b) and 234, SCACR, moves the court for leave to file enlarged brief. In support of the motion, the Appellants shows following to the court:

1. The issues presented on appeal are based on two trials, and "Emergency Exparte And Proposed Motion for Immediate Release, Double Jeopardy, False Imprisonment, Lack of Trial Court Jurisdiction to Impose Sentence, First and Fourteenth Right to Familial Association," an "Emergency Motion for Alteration, Modification, Amend, Reconsideration, and Rescission of Order," and A November 17, 2022 Hearing Transcript pursuant to Appellants' Emergency Motion for Alteration..." Some issues are complex and Appellants need to exceed the 50-page limitation to be able to address the issues adequately.

2. Those issues are:

- (a) Double Jeopardy; 1. Judgment of Acquittal; 2. Manifest Necessity;
 - (b) Fourth, and Fourteenth Amendment violation;
 - (c) Indictment, Fifth Amendment violation;
 - (d) False Imprisonment, Lack Of Trial Court Jurisdiction To Impose Sentence;
 - (d) Right to testify in own defense and right to self- representation.
 - (e) Gwendolyn B. Frasier and LaQuesha A. Felder' First and Fourteenth Amendment right to familial association;
3. The Fourth Amendment issue is simple because Appellant Terron Dizzley's arrest warrant is constitutionally deficient because the affidavit in the arrest warrant lacks probable cause, which resulted in kidnapping, false imprisonment. However, the issue is complex because Appellant must prove and can prove that his unlawful arrest tainted the entire judicial process resulting in a conviction and sentence that was without legal and jurisdictional authority. Which is one of Appellant's false imprisonment issues.
4. The Appellants believe that they can address these issues in an adequate manner if the court will allow them to exceed the page limitation by 20 pages for a total of 70 pages.

WHEREFORE, the Appellants move the court to allow them to exceed the page limitation by 20 pages for a total of 70 pages.

Date: March 28, 2023

Respectfully submitted,

s. Terron Dizzley

Terron Dizzley, 359480
Allendale Correctional Facility
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S. Gwendolyn B. Frasier
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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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MAR 30 2023

SC Court of Appeals

Appeal from Georgetown County

Honorable Judge Benjamin Culbertson, Circuit Court Judge

THE STATE,

RESPONDENT,

v

Terron Gerhard Dizzley
Gwendolyn B. Frasier
Laquesha Felder

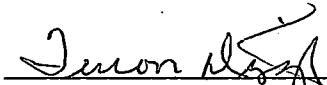
Appellants.

APPELLATE CASE NO. 22-000671

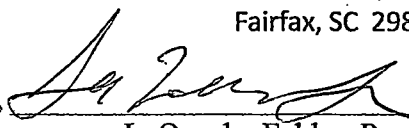
CERTIFICATE OF SERVICE

I, Terron Dizzley, Gwendolyn B. Frasier and LaQuesha Felder hereby certify on this ____ March, 2023, filed Appellant's Motion For Leave To File Enlarged Brief in the above matter by placing in U. S. mail, postage prepaid, sent to the address below:

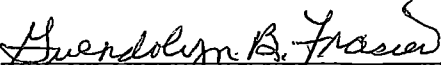
Clerk of Court of Appeals, Jenny A. Kitchings
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Terron Gerhard Dizzley
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NOTICE

Dear Honorable Clerk:

Enclosed, please find an original and two copies of Appellant's Motion for Leave to File Enlarged Brief. Stamped filed. Please send copy back to me.

Date: March 28, 2023

With kind regards,

Clerk of Court of Appeals, Jenny A. Kitchings
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