

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APR 05 2023

SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS
HONORABLE GRACE GILCHRIST KNIE, JUDGE

Case No. 2018-CP-42-0968

JAMES A. BROWN #282981Appella it,

v.

STATE OF SOUTH CAROLINARespo ide it.

MOTION TO FILE APPEALS

JAMES A. BROWN APPEALS THE ORDER OF THE HONORABLE GRACE GILCHRIST KNIE DATED JANURARY 02, 2020, COVID-19 PANDEMIC YEAR, WHICH DENIED HIS WRIT OF MANDAMUS AGAINST THE STATE OF SOUTH CAROLINA COUNTY OF SPARTANBURG THAT THE CRIMINAL COURT LACKED SUBJECT MATTER JURISDICTION TO CONVICT HIM BECAUSE THE GRAND-JURY WAS NOT PROPERLY CONVENED DURING A WEEK OF GENERAL-SESSIONS IN SPARTANBURG COUNTY ON THE DATED ON THE INDICTMENT, BY SOLICITOR'S OFFICE, WAS INVALIDITY AND SUBJECT MATTER JURISDICTION CAN BE RASIED ANYTIME.

OTHER COUNSEL ON RECORD:
APPEAL FROM DENIAL OF AN
EXPARTE MOTION BY JUDGE
GRACE GILCHRIST KNIE
HARLEY LITTLETON KIRKLAND
T. PARK C. HUNTER, ESQUIRE

1st James A. Brown
JAMES A. BROWN #282981

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APR 05 2023

SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS
HONORABLE GRACE GILCHRIST KNIE, JUDGE
CASE No. 2018-CP-42-0968

JAMES A. BROWN #282981APPELLANT,

v.

STATE OF SOUTH CAROLINARESPONDENT.

PROOF OF SERVICE

I, James A. Brown, DO HEREBY CERTIFY THAT I SERVED THAT I SERVED TRUE COPIES OF THE PETITION FOR WRIT OF CERTIORARI, MOTION FOR A EVIDENTARY HEARING ON THIS MATTER BY PLACING THE SAME IN THE MAIL, U.S. MAIL POSTAGE-PREPAID ADDRESSED TO THE SOUTH CAROLINA COURT OF APPEALS CLERK JENNY ABBOTT KITICHINGS, POST OFFICE BOX 11629 COLUMBIA, SOUTH CAROLINA 29211 AND ALAN WILSON, ATTORNEY GENERAL OFFICE POST OFFICE BOX 11549 COLUMBIA, SOUTH CAROLINA 29211-1549 AND ASSIST HARLEY LITTLETON KIRKLAND, T. PARK C. HUNTER, ESQUIRE.

MARCH 31, 2023.

1s/ James A. Brown

JAMES A. BROWN
[282981/SCDC]

RECEIVED

MAR 31 2023

PCI MAILROOM

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Jenny Abbott Kitchings, Clerk
-Clerk of Court-
Post Office Box 11629
Columbia, S.C. 29211

APR 05 2023
SC Court of Appeals

RE: TO CASE No. 2018-CP-42-0968/01-GS-42-0296

Dear Clerk,

Enclosed Please Find My Original Motion for Appeals
~~from the Spartanburg County General Sessions Court to be Filed~~
in Your Office.

--I Thank You Very Much in this Matter.

March 31, 2023.

1s/ James A. Brown
James A. Brown
[No. 282981/SCDC]

PERRY CORRECTIONAL INSTITUTE
430 Oakalwn Road
Pelzer, S.C. 29669

RECEIVED

MAR 31 2023

PCI MAILROOM

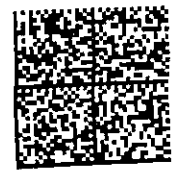
James Brown #282981
22B-224
1300Aklawn Rd.
Derry Correction Inst.
Delzer S.C.
29669

RECEIVED
APR 05 2023

SC Court of Appeals

RECEIVED
MAR 31 2023
PCI MAILROOM

South Carolina Court of Appeals Clerk
Jenny Abbott Kitchings, Post office Box
11629 Columbia, S.C. 29211



US POSTAGE TM PITNEY BOWES



ZIP 29210 \$ 001.08⁰
02 4W
0000378725 APR 03 2023



2921189999

