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2023 MAY -5 PM 4: 21 **No. 2022-000339**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals (as Transferred from the Supreme Court of South Carolina)

APPEAL from RICHLAND COUNTY Court of COMMON PLEAS

D. Craig Brown, Circuit Court Judge, Case No. 2019-CP-40-01374,

Which is an Appeal from Richland County (Dentsville) Magistrate Phillip F. Newsom

As transferred to Richland Count Magistrates from the City of Columbia' Municipal Court

Summary Court No. L066971

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City of Columbia, SC,

Respondent,

MAY 05 2023

v.

Marie Assa'ad-Faltas, MD, MPH,

Appellant.

SC Court of Appeals

Appellant's Motion for a 30-to-60-Day Extension of Time to File her Initial Reply Brief.

Without implying any intentional dishonesty by Mr. Marshall James, Counsel for Respondent, his initial respondent's brief is replete with factual and legal errors which Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") *pro se* is "required" to correct lest she be bound by them per *qui non negat fatetur*. She is further "required" by *true* respect for law to expect this Court to accord her equal protection of the laws including filing a reply brief as allowed to all similarly-situated litigants.

The power of the last word made many SC criminal defendants forgo presentation of evidence until *State v. Beaty* held the last-argument rule of old (against which Dr. Assa'ad-Faltas, ahead of her time as usual, had argued *in this very case* below) denied due process. So, she is morally and legally required to file a reply brief but needs more time due to her poor health condition and press of other matters.

Dr. Assa'ad-Faltas also believes she has cracked the figurative code of why no political entity other than the federal government or one of the states or tribal nations may own or operate a court. The American Revolution itself was against Europe's model of sovereignty: from-up-down "divine" rights of kings which may be *further* handed down in smaller pieces to fiefdoms and nobility. In replacing it with the republican form of government, the Constitution folded the social contract of the Enlightenment into a from-down-up sovereignty where a majority of the people lift **only two of the split atom of sovereignty: the federal government and the states (or tribal nations)**. No entity elected by less than the majority of the *entire* population of the state or federal sovereign may exercise sovereign powers over the natural persons themselves: the ultimate power to deprive a natural person of life, limb or liberty. All other powers are corporate powers which may be exercised by non-sovereigns. Since all City of Columbia ("*the City*") officials are elected only by a majority of *the City's* inhabitants, not all SC's inhabitants, *the City* cannot exercise sovereign powers of sentencing natural persons to incarceration even if delegated that authority from the state sovereign. The SC state sovereign could not delegate sovereignty *down*. That is the European from-up-down against which the Colonies revolted. Sovereignty could be delegated laterally in compacts and treaties or up as in ceding land to the federal government.

If this submission is accepted as suitably modified by an open-minded court, it will revolutionize much and solve more; but more immediately, it would *efficiently* end this matter in Dr. Faltas' favor since the ultimate non-jurisdiction is that the entity which convicted and sentenced her is NOT a court *ab initio*.

Dr. Faltas further needs the extension to research any authority she may have overlooked on that idea and notes that Respondent's counsel was given all three extensions he sought and is unlikely to object.

SIGNATURE and Certificate of Service Satisfying the Substance of Form 7 and of all Relevant Rules, SCACR

WHEREFORE, the 30-to-60 day extension should be granted as sincerely sought on 5 May 2023.

On 5 May 2023, I served Mr. Marshall James, sole Counsel for sole Respondent in this case, with a true copy of this document by going to City of Columbia's Legal Department's office location on Washington and Main Streets, Columbia, SC 29201, and there and then hand-delivering the true copy of this document to a person long known to me to be approved and entrusted to deliver it to Mr. Marshall, all God so willing.

s/Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant *pro se*
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