

THE STATE OF SOUTH CAROLINA

**No. 2022-000339**

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 (CMC)

Summary Court No. L066971

RECEIVED

City of Columbia, SC,

Respondent,

MAY 19 2023

v.

Marie Assa'ad-Faltas, MD, MPH,

Appellant.

SC Court of Appeals

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

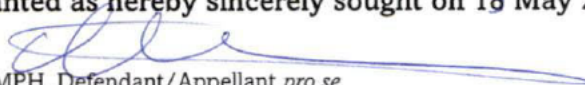
For the now-augmented reasons in Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") *pro se's* first motion for extension, which was granted only to 22 May 2023 **but without explicit or implied prejudice to further requests as available in** 18 March 2009 order of South Carolina's ("SC") Supreme Court ("S Ct") [www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2009-03-18-01](http://www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2009-03-18-01), Dr. Assa'ad-Faltas now shows good cause and requests a 30-day extension to file her initial reply brief.

The issue of no entity other than the **only** two types of sovereign allowed by the U.S. Constitution being able to exercise the sovereign power over the liberty, limb and/or life of a natural person is **not** academic for Dr. Assa'ad-Faltas: she stands at risk of having her *whole* person incarcerated in a life-threatening jail after being convicted in the court of a **non-sovereign** which did not even have the necessary sovereign power of issuing subpoena *duces tecum* or subpoena to any person outside the City of Columbia or Richland County. Compulsory process is so essential to a fair criminal trial; and a non-sovereign without power to send compulsory process throughout the sovereign state cannot exercise the power of the sovereign state to try, convict, and incarcerate a natural person. This extension is needed for further research into further support for her revolutionary ideas to advance the law.

Also, complete impeachment of adverse witnesses is a right Dr. Faltas was denied below. The *Glossip* petition now pending before the U.S. Supreme Court ("SCOTUS") presents the question whether partial impeachment of an adverse witness satisfies *federal constitutional* due process. SCOTUS stayed Mr. Glossip's execution and rescheduled ruling on main petition several times, which suggests SCOTUS is likely to grant and hear the issue. The extension is also needed to study new SCOTUS decisions.

And Dr. Faltas' general health continued to deteriorate in the meanwhile; and specifically this week, she suffered an injury to her left hand which makes typing excruciatingly painful and slow. Dr. Faltas notes that Respondent's counsel was given all three extensions he sought and is unlikely to object.

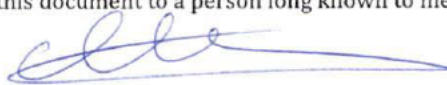
**WHEREFORE, the 30-day extension should be granted as hereby sincerely sought on 18 May 2023.**



s/Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant *pro se*  
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**Certificate of Service Satisfying the Substance of Form 7 and of all Relevant Rules, SCACR**

On 18 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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