

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

Appellate Cases Nos. 2023-000617, 618 and 619

APPEALS from SC Circuit Judge D. Craig Brown ("JDCB"), sitting in CIRCUIT COURT OF COMMON PLEAS IN RICHLAND COUNTY and Denying Applications for Post-Conviction Relief (PCR) No. 2019-CP-40-02217,

No. 2019-CP-40-02218, and No. 2019-CP-40-02219

Marie Assa'ad-Faltas, MD, MPH

v.

State of South Carolina, and City of Columbia, SC

Applicant/Petitioner's MOTION for her *Timely* 9 June 2023
PROVISIONAL SUPPLEMENT to be correctly filed as such
and for the additional Exhibits 26-30 hereto to be added to it.

This Court's Clerk promptly scanned (an unnecessary laborious step were Dr. Assa'ad-Faltas allowed to file and serve by e-mail like *all* similarly-situated others in this State) and filed Applicant/Petitioner Marie Assa'ad-Faltas, MD, MPH's ("Dr. Assa'ad-Faltas" or "Dr. Faltas") 9 June 2023 unified three-part submission **only as two motions**. Dr. Assa'ad-Faltas now asks that said submission be also filed and treated as her *pro se* timely provisional supplements to her *timely* 19 May 2023 *Dennison* responses in these three cases **because said unified document was so titled "combined with" two motions.**

True and effective, not ceremonial or empty, care for judicial economy makes Dr. Faltas combine all prayers for relief in one case (or in all related cases) in one document whenever the same set of facts, exhibits, and/or legal arguments, supports the different elements of relief. **After all, Rule 8, SCRPC, allows a plaintiff to set in a single complaint all causes of action supported by the alleged facts.** Any different reading of this Court's desires in *Dr. Faltas' cases alone* assumes a petty desire to exhaust and drain her with the cost of duplicative papers while inflicting *physical* pain on her by denying her the use of an *existing* ramp while awaiting *another* "ADA ramp" 33 years after ADA's enactment.

In that spirit, Dr. Faltas seeks judicial notice of the discrepancy between this Court's "officer" Griffith's sworn affidavit that he mailed *his* *Dennison* responses to Dr. Faltas on 23 May 2023 and the 25 May 2023 postmark on Ex. 27 hereto. **Throughout his unwelcome representation in these cases, Griffith constantly slapped Dr. Faltas with Griffith's sloppiness in all matters big and small and genuine or fake inability to understand law as if saying, "you are entitled to no better than this."**

Griffith's *total* absence of desire to help his client is clear *inter alia* in his muteness when, in the attached transcript (Ex. 26 hereto) of the 16 November 2022 PCR hearing before soon-to-be-retired SC Circuit Judge Brown ("JDCB"), the latter wondered if Dr. Faltas were a cardiologist. Easy and obvious answer: It does NOT take a cardiologist to read two plain English words "Abnormal EKG."

Knowing that life begins at fertilization and motherhood is integral to femininity, Dr. Faltas notes the hypocrisy of Retired SC Justice Kay Hearn's authoring *Samuel* and being the swing vote to deny life itself to the unborn under false pretexts of privacy and feminism while forcing Dr. Faltas to accept a man speaking for her and to disclose her cardiologist to *merely* receive appearance by WebEx. Exx 28-30 hereto **are but samples of Dr. Faltas' continuously increasing knowledge and expertise in inter alia CARDIOLOGY.** And the irony of it all is that *this Court* now orders Dr. Faltas to say what she would have said *pro se* as early as April 2019 had a conditional order of dismissal been served on her *like all similarly situated PCR applicants* the timeliness of whose PCR applications is doubted. **Hopefully now this Court finally heeds its own prior opinions and rulings that PCR times are toll-able.**

CONCLUSION: equitable tolling makes the three PCRs underlying these three appeals timely.

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 tlgriffith@tlgriffith.com, and to SCCOID at hyoung@sccid.sc.gov, and hryan@sccid.sc.gov, and relevant others, all on 16 June 2023, and all God-so willing.

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