

APPELLANT'S MOTION FOR CONTEMPT AND SANCTIONS

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2012-CP-40-04857

Allen University,

Respondent,

v.

Lawrence Terry,

Appellant.

RECEIVED

JUL 0 5 2013

SC Court of Appeals

APPELLANT'S MOTION FOR CONTEMPT AND SANCTIONS

ARGUMENT

Rule 205 of the SCACR states, "Upon the service of the notice of appeal, the appellate court shall have exclusive jurisdiction over the appeal;" The Notice of Appeal was filed on 2/19/2013. The fraudulent misconduct at hand occurred on 2/22/2013. Therefore this court has complete jurisdiction over this issue and with the occurrences happening after the Notice of Appeal being filed, these issues could not have been brought before the lower court. Debbie Durban is the attorney for the Respondent and to whom the requests for sanctions are for.

At some point in time Debbie Durban contacted the Circuit Court's Clerk Of Court and ,without motion or order, instructed them to alter the Respondent's actions by refileing their 8/8/2012 Motion For Protective Order, 8/28/2012 Motion For Protective Order, and 8/28/2012 Renewed Motion to Show Cause. Changes were made on 2/22/2013, noted on the Case History.

Courts have the power to punish for both civil and criminal contempt. IN re Brown, 333 S.C. 414, 420, 511 S.E.2d 351, 355 (1998). It is within the trial court's discretion to punish by fine or imprisonment all contempts of authority before the court. S.C.Code Ann. § 14-5-320 (1976). In addition, courts have the inherent power to punish for offenses that are calculated to obstruct, degrade, and undermine the administration of justice. State ex rel. McLeod v. Hite, 272 S.C. 303, 305, 251 S.E.2d 746, 747 (1979).

Direct contempt involves contemptuous conduct in the presence of the court. State v. Kennerly, 337 S.C. 617, 620, 524 S.E.2d 837, 838 (1999). A person may be found guilty of direct contempt if the conduct interferes with judicial proceedings, exhibits disrespect for the court, or hampers the parties or witnesses. State v. Havelka, 285 S.C. 388, 389, 330 S.E.2d 288 (1985). Direct contempt that occurs in the court's presence may be immediately adjudged and sanctioned summarily. Int'l Union, United Mine Workers of Am. v. Bagwell, 512 U.S. 821, 827, 114 S.Ct. 2552, 129 L.Ed.2d 642 (1994).

"South Carolina courts have always taken a liberal and expansive view of the `presence' and `court` requirements." Kennerly, 337 S.C. at 620, 524 S.E.2d at 838. The "presence of the court" extends beyond the mere physical presence of the judge or the courtroom to encompass all elements of the system. *Id.* Instead of adhering to the Civil Rules of Procedure, specifically Rule 7(b)(1), Debbie Durban strategically planned to elude the presence of the court by directly contacting the clerk of court requesting them to alter the mistakes she made in this case. She then inserted these altered documents, as evidence, to this Appeal Court with the intent to undermine the administration of justice. She attempted to take advantage of the Pro Se Appellant.

In the Respondent's Initial Brief, Debbie Durban claimed that she did timely file responses to the Requests For Admissions and Amended Complaint. On page 3 of their Initial Brief Allen University, by way of Debbie Durban, even attempted to blame the clerk of court for their negligence in handling their case by stating at the bottom of the page, "*Allen notes that apparently the clerk of court initially filed the renewed motions with Appellant's fourth lawsuit, rather than the present lawsuit. When brought to the clerk's attention, the clerk refiled the motions with the present action.*" This change was made in February 2013, five months later. As I previously stated, I pointed out the fact that Debbie Durban failed to reply or respond approximately 9 times in multiple documents filed with the court between September to December 2012. In the PLAINTIFF'S BRIEF IN REPLY TO DEFENDANT'S

MEMORANDUM IN OPPOSITION TO PLAINTIFF'S MOTION FOR RECONSIDERATION filed 10/8/2012, the Appellant made the negligence of Debbie Durban in handling this case very clear by specifically stating on page 1 line 24, "Now I just noticed that the Defendant has negligently used multiple case numbers on their Memorandum In Opposition and if the Defendant has done the same on previous allegedly submitted documents then that would make them grossly negligent in handling their case and with no fault of the Clerk of Court or the Plaintiff." The Respondent was technically in Default based on Debbie Durban's failure to properly respond to the Appellant's Amended Complaint and Appellant's properly filed Affidavit of Default. Allen University's attorney also failed to respond to the Requests for Admissions, deeming them all admitted. Further, there is clear and convincing evidence that Respondent's failure to reply to discovery requests, including the Request for Admissions, also violated Rules 1.1 and 1.3. See Matter of Solomon, 307 S.C. 1, 413 S.E.2d 808 (1992) (finding misconduct where attorney failed to respond to requests for admissions so they were deemed admitted and judgment was granted against client). If the Respondent claims she turned over all discovery matters in this case an associate, Debbie Durban still retained control of the case and it was her responsibility to ensure any associate was appropriately responding to discovery requests. Rule 407, SCACR, Rule 5.1 (responsibilities of the supervisory lawyer).

My requests for sanctions are based many things under SCACR 407 including:

"RULE 3.4: FAIRNESS TO OPPOSING PARTY AND COUNSEL

A lawyer shall not:

(a) unlawfully obstruct another party's access to evidence or unlawfully alter, destroy or conceal a document or other material having potential evidentiary value. A lawyer shall not counsel or assist another person to do any such act;

(b) falsify evidence...

Comment

[1] The procedure of the adversary system contemplates that the evidence in a case is to be marshaled competitively by the contending parties. Fair competition in the adversary system is secured by prohibitions against destruction or concealment of evidence, improperly influencing witnesses, obstructive tactics in discovery procedure, and the like.

[2] Documents and other items of evidence are often essential to establish a claim or defense. Subject to evidentiary privileges, the right of an opposing party, including the government, to obtain evidence through discovery or subpoena is an important procedural right. The exercise of that right can be frustrated if relevant material is altered, concealed or destroyed. Applicable law in many jurisdictions makes it an offense to destroy material for purposes of impairing its availability in a pending proceeding or one whose commencement can be foreseen. Falsifying evidence is also generally a criminal offense. Paragraph (a) applies to evidentiary material generally, including computerized information.”

Referring to Rule 3.4, it is unlawful to alter a document and based on the Case History provided to this court it is clear the Debbie Durban meticulously eluded the SCCRP, court’s eye, and the Appellant’s by waiting until the lower court’s order was finalized and the Appellant filed his Notice of Appeal then contacting the Clerk of Court. Debbie Durban and Allen University knew of these issues for 5 months and knowingly did not act. Knowing her actions could amount to fraud upon the court the Respondent still convinced the clerk of court to alter documents having potential evidentiary value and that would change the complete dynamics of this case. Under *Rule 8.4 Misconduct;*” [1] *Lawyers are subject to discipline when they violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so or do so through the acts of another, as when they request or instruct an agent to do so on the lawyer's behalf.*” The Appellant referred to the altered documents numerous times during the proceedings and the changes were made without notice to the Appellant thereby leaving the Appellant truly prejudiced. Rule 3.4 mentions “Fair competition”. It is quite apparent that based on Debbie Durban’s secretive actions fair competition could not be achieved. There is no way possible that an experienced lawyer would think that by changing the material facts of pending proceedings it would not result in possible sanctions being handed down against them. Debbie Durban’s conduct interferes with the judicial proceedings, exhibited disrespect for both courts, and hampered the Appellant in handling his case.

RULE 4.1: TRUTHFULNESS IN STATEMENTS TO OTHERS

“In the course of representing a client a lawyer shall not knowingly:

(a) make a false statement of material fact or law to a third person;

Misrepresentation

[1] A lawyer is required to be truthful when dealing with others on a client's behalf, but generally has no affirmative duty to inform an opposing party of relevant facts. A misrepresentation can occur if the lawyer incorporates or affirms a statement of another person that the lawyer knows is false. Misrepresentations can also occur by partially true but misleading statements or omissions that are the equivalent of affirmative false statements."

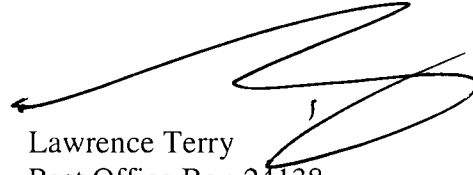
In the Initial Brief Debbie Durban proudly stated that, "Allen notes that apparently the clerk of court initially filed the renewed motions with Appellant's fourth lawsuit, rather than the present lawsuit. When brought to the clerk's attention, the clerk refiled the motions with the present action." She proudly made these statements knowing that she was the one who made multiple errors in her case. She attempted to push the blame on the Clerk of Court who properly filed the motions based on the case numbers Debbie Durban specifically wrote. The disrespect shown in her multiple misrepresentations of truth are disappointing to say the least and discredit the process of our justice system. Rule 8.4(a)(d) and (e) also apply to her actions.

CONCLUSION

Debbie Durban had approximately 5 months to motion the court for relief but instead strategically chose to wait until after the lower court made a final judgment and after the Appellant filed his Notice of Appeal. She did this knowing that when the Appeals Court viewed the docket it would indeed show all the proper motions to support her claims that she did timely respond to the Request for Admissions and Amended Complaint. Debbie Durban knows the Appellant made all of his decisions including filed motions, arguments, and affidavits based on what the circuit court docket stated. Appellant did not discover that the motions were altered until 6/14/2013. Debbie Durban is a well respected Partner at one of the nation's most prestigious law firms and well aware of the court's rules and sanctions. Based on her actions she committed fraud upon the Court in bringing the altered evidence forward in the Court of Appeals with the intent to deceive all. The Notice of Appeal was filed on 2/19/2013. The fraudulent issues at hand occurred on 2/22/2013. Based on Rule 205 of the SCACR this court has complete jurisdiction over this issue and with the occurrences happening after the Notice of Appeal being filed, these issues could not have been brought before the lower court.

Therefore, the Appellant respectfully requests this court place sanctions on Debbie Durban and/or Allen University as deemed proper and also instruct the Clerk of Court to remove the altered motions.

July 5, 2013

A handwritten signature in black ink, appearing to be 'Lawrence Terry', written over the printed name and address.

Lawrence Terry
Post Office Box 24138
Columbia, South Carolina 29224
(803) 414-0760
Appellant, Pro Se

Exhibit F

Richland County Common Pleas
CASE HISTORY FOR CASE 2012CP4004857

Lawrence Terry vs Allen University

FILED DATE: 7/16/2012

CASE TYPE CP/Personal Injury 350

STATUS: Appeal

JUDGE:

CASE PARTIES:

Plaintiff Terry, Lawrence

Defendant Allen University

Plaintiff Pro Se Terry, Lawrence
P O Box 24138, Columbia, SC 29224

Defendant Attorney Durban, Debbie Whittle
PO Box 11070, Columbia, SC 29211

CASE HISTORY FOR CASE 2012CP4004857

Allen University

Age: Unknown
DL#:

DOB: Unknown
SSN: 000-00-0000

COST	ORIGINAL	BALANCE DUE	DISBURSED	PAY PRIORITY
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Total:

DATE	TIME	EVENT DESCRIPTION
7/31/2012	12:12 PM	Motions to Show Cause, For Sanctions, and To Dismiss
8/1/2012	12:00 AM	COCMORENO recorded the following Case Note: Certificate of Service
8/8/2012	3:06 PM	Motion For Protective Order
10/3/2012	12:12 PM	Filing recorded: Memorandum in Opposition to Plaintiff's Motion For Reconsideration of Court's Order Dismissing Case, Certificate of Case
10/3/2012	12:00 AM	COCMORENO recorded the following Case Note: Memorandum in Opposition to Plaintiff's Motion For Reconsideration of Court's Order Dismissing Case, Certificate of Case
2/22/2013	12:00 AM	COCMORENO recorded the following Case Note: Certificate of Service

Print Date: 06/14/2013
Print Time: 9:54:59AM
Requested By: COCRYAN

**Richland County Common Pleas
CASE HISTORY FOR CASE 2012CP4004857**

Lawrence Terry vs Allen University

CASE TYPE CP/Personal Injury 350

JUDGE:

STATUS: Appeal

FILED DATE: 7/16/2012

CASE PARTIES:

Plaintiff Terry, Lawrence

Defendant Allen University

Plaintiff Pro Se Terry, Lawrence
P O Box 24138, Columbia, SC 29224

Defendant Attorney Durban, Debbie Whittle
PO Box 11070, Columbia, SC 29211

CASE HISTORY FOR CASE 2012CP4004857

Terry, Lawrence

Age: Unknown
DL#:

DOB: Unknown
SSN: 000-00-0000

COST	ORIGINAL	BALANCE DUE	DISBURSED	PAY PRIORITY
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Total:

DATE	TIME	EVENT DESCRIPTION
7/16/2012	11:11 AM	Filing recorded: Request/Request for Production of Documents
7/16/2012	11:11 AM	Filing recorded: Request/Request for Admissions
7/16/2012	4:02 PM	Filing recorded: Summons & Complaint
7/16/2012	4:08 PM	Filing recorded: ADR/Alternative Dispute Resolution (Workflow)
7/16/2012	4:14 PM	Filing recorded: Affidavit
7/16/2012	4:15 PM	Filing recorded: Interrogatories
7/18/2012	8:49 AM	Filing recorded: Amended Coversheet For Non Jury
7/20/2012	11:31 AM	Motion For An Expedited Non Jury Trial Date
7/20/2012	1:21 PM	Motion/Motion Filing Fee
7/26/2012	9:00 AM	Filing recorded: Verification/Verified

Print Date: 06/14/2013
Print Time: 9:35:50AM
Requested By: COCTRIBBLE

CASE HISTORY FOR CASE 2012CP4004857

8/10/2012	10:11 AM	Filing recorded: Amended Complaint For Negligence and Intentional Infliction
8/10/2012	3:34 PM	Filing recorded: Service/Affidavit Of Service on Allen University
8/13/2012	12:00 AM	COCMORENO recorded the following Case Note: Amended Complaint For Negligence and Intentional Infliction of Emotional Distress
8/17/2012	2:17 PM	Filing recorded: Statement of Additional Facts For Motion For An Expedited No
8/17/2012	2:18 PM	Filing recorded: Reply to Defendant's Motions to Show Cause, For Sanctions, a
8/20/2012	12:00 AM	COCMORENO recorded the following Case Note: Reply to Defendant's Motions to Show Cause, For Sanctions, and to Dismiss
8/20/2012	12:00 AM	COCMORENO recorded the following Case Note: Statement of Additional Facts For Motion For An Expedited Non-Jury Trial Date
8/27/2012	10:50 AM	Motion For Summary Judgment
8/27/2012	4:54 PM	Motion/Motion Filing Fee
8/28/2012	11:25 AM	Filing recorded: Motion For Protective Order
8/28/2012	11:28 AM	Filing recorded: Renewed Motion to Show Cause, For Sanctions, and to Dismiss
9/11/2012	9:51 AM	Filing recorded: Brief in Support of Motion For Summary Judgment
9/11/2012	10:35 AM	Filing recorded: Affidavit of Default
9/14/2012	8:39 AM	Motion/Motion Filing Fee
9/14/2012	2:30 PM	Motion For Default Judgment
9/17/2012	12:00 AM	COCGUNTER recorded the following Case Note: Form Order This Casue of Action is DISMISSED with prejudice. Plaintiff May Appeal, but may not file another cause of action regarding this matter with this court.
9/17/2012	1:59 PM	Form Order This Casue of Action is DISMISSED with prejudice.
9/18/2012	8:43 AM	Motion/Motion Filing Fee
9/18/2012	9:34 AM	Motion For Reconsideration on Order to Dismiss
9/19/2012	11:36 AM	Filing recorded: Affidavit of Plaintiff
9/19/2012	11:37 AM	Filing recorded: Brief in Support of Motion For Reconsideration on Order to D
9/20/2012	12:00 AM	COCMORENO recorded the following Case Note: Brief in Support of Motion For Reconsideration on Order to Dismiss
9/21/2012	12:00 AM	COCMORENO recorded the following Case Note: Memorandum of Law in Support of Motion For Reconsideration on Order to Dismiss
9/21/2012	9:37 AM	Filing recorded: Memorandum of Law in Support of Motion For Reconsideration o
9/24/2012	12:00 AM	COCMORENO recorded the following Case Note: Additional Statements of Fact in Support of Motion For Reconsideration on Order to Dismiss
9/24/2012	11:57 AM	Filing recorded: Additional Statements of Fact in Support of Motion For Recon
10/4/2012	12:00 AM	COCMORENO recorded the following Case Note: Reply to Defendant's Memorandum in Opposition of Plaintiff's Motion For Reconsideration
10/4/2012	2:38 PM	Filing recorded: Reply to Defendant's Memorandum in Opposition of Plaintiff's
10/8/2012	8:48 AM	Filing recorded: Brief In Reply To Defendant's Memorandum in Opposition to Pl
10/9/2012	12:00 AM	COCMORENO recorded the following Case Note: Brief In Reply To Defendant's Memorandum in Opposition to Plaintiff's Motion For Reconsideration
12/11/2012	12:00 AM	COCMORENO recorded the following Case Note: Additional Statements of Facts in Reply to Defendants Memorandum In Opposition of Plaintiff's Motion For Reconsideration
12/11/2012	4:41 PM	Filing recorded: Additional Statements of Facts in Reply to Defendants Memora
12/13/2012	10:06 AM	Filing recorded: Memorandum of Law in Support of Motion For Default Judgment
2/11/2013	10:44 AM	Form Order Plaintiff's motion for Reconsideration is DENIED.
2/19/2013	10:42 AM	Filing recorded: Notice of Appeal
2/22/2013	12:00 AM	COCGUNTER recorded the following Case Note: Renewed Motion to Show Cause, For Sanctions, and to Dismiss Plaintiff's Amended Complaint, Certificate of Service
2/22/2013	12:00 AM	COCGUNTER recorded the following Case Note: Renewed Motion to Show Cause, For Sanctions, and to Dismiss Plaintiff's Amended Complaint, Certificate of Service



Richland County
Fifth Judicial Circuit
Public Index Search



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Lawrence Terry vs Allen University

Case Number: 2012CP4004857
Case Type: Common Pleas
Status: Pending
Disposition:
Original Source Doc:
Judgment Number:

Court Agency: Richland County Common Pleas
Case Sub Type: Personal Injury 350
Assigned Judge:
Disposition Date
Original Case #:

Filed Date: 07/16/2012
File Type: Non-Jury

Disposition Judge:

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Actions

Name	Description	Action Type	Begin Date	Completion Date
Terry, Lawrence	Request/Request for Production of Documents	Filing	07/16/2012 - 11:11:06	
Terry, Lawrence	Request/Request for Admissions	Filing	07/16/2012 - 11:11:40	
Terry, Lawrence	Summons & Complaint	Filing	07/16/2012 - 16:02:55	
Terry, Lawrence	ADR/Alternative Dispute Resolution (Workflow)	Filing	07/16/2012 - 16:08:57	
Terry, Lawrence	Affidavit	Filing	07/16/2012 - 16:14:37	
Terry, Lawrence	Interrogatories	Filing	07/16/2012 - 16:15:03	
Terry, Lawrence	Amended Coversheet For Non Jury	Filing	07/18/2012 - 08:49:52	
Terry, Lawrence	Motion For An Expedited Non Jury Trial Date	Motion	07/20/2012 - 11:31:19	
Terry, Lawrence	Motion/Motion Filing Fee	Amount	07/20/2012 - 13:21:42	
Terry, Lawrence	Verification/Verified	Filing	07/26/2012 - 09:00:54	
Terry, Lawrence	Motions to Show Cause, For Sanctions, and To Dismiss	Motion	07/31/2012 - 12:12:07	
Allen University	Amended Complaint For Negligence and Intentional Infliction	Filing	08/10/2012 - 10:11:01	
Terry, Lawrence	Service/Affidavit Of Service on Allen University	Filing	08/10/2012 - 15:34:46	
Terry, Lawrence	Statement of Additional Facts For Motion For An Expedited No	Filing	08/17/2012 - 14:17:13	
Terry, Lawrence	Reply to Defendant's Motions to Show Cause, For Sanctions, a	Filing	08/17/2012 - 14:18:16	
Terry, Lawrence	Motion For Summary Judgment	Motion	08/27/2012 - 10:50:25	
Terry, Lawrence	Motion/Motion Filing Fee	Amount	08/27/2012 - 16:54:34	

Exhibit D



Fifth Judicial Circuit Public Index Search

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Lawrence Terry vs Allen University

Number: 2012CP4004857	Court Agency: Richland County Common Pleas	Filed Date: 07/16/2012
Case Type: Common Pleas	Case Sub Type: Personal Injury 350	File Type: Non-Jury
Status: Dismissed	Assigned Judge:	
Disposition: Dismissed by Court - not Rule 40J	Disposition Date: 09/17/2012	Disposition Judge: Manning, L Casey
Source Doc:	Original Case #:	
Number:		

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Description	Action Type	Begin Date	Completion
Motion For An Expedited Non Jury Trial Date	Motion	07/20/2012 - 11:31:19	09/17/2012 - 1
Motion/Motion Filing Fee	Amount	07/20/2012 - 13:21:42	09/17/2012 - 1
Verification/Verified	Filing	07/26/2012 - 09:00:54	09/17/2012 - 0
Motions to Show Cause, For Sanctions, and To Dismiss	Motion	07/31/2012 - 12:12:07	09/17/2012 - 1
Amended Complaint For Negligence and Intentional Infliction	Filing	08/10/2012 - 10:11:01	09/17/2012 - 1
Service/Affidavit Of Service on Allen University	Filing	08/10/2012 - 15:34:46	09/17/2012 - 1
Statement of Additional Facts For Motion For An Expedited No	Filing	08/17/2012 - 14:17:13	09/17/2012 - 1
Reply to Defendant's Motions to Show Cause, For Sanctions, a	Filing	08/17/2012 - 14:18:16	09/17/2012 - 1
Motion For Summary Judgment	Motion	08/27/2012 - 10:50:25	09/17/2012 - 1
Motion/Motion Filing Fee	Amount	08/27/2012 - 16:54:34	09/17/2012 - 1
Brief in Support of Motion For Summary Judgment	Filing	09/11/2012 - 09:51:24	09/17/2012 - 0
Affidavit of Default	Filing	09/11/2012 - 10:35:39	09/17/2012 - 1
Motion/Motion Filing Fee	Amount	09/14/2012 - 08:39:55	09/17/2012 - 0
Motion For Default Judgment	Motion	09/14/2012 - 14:30:49	
Form Order This Case or Action is DISMISSED with prejudice	Order	09/17/2012 - 13:59:23	09/17/2012 - 1
Motion/Motion Filing Fee	Amount	09/18/2012 - 08:43:44	
Motion For Reconsideration on Order to Dismiss	Motion	09/18/2012 - 09:34:19	

Fifth Judicial Circuit
Public Index Search

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Lawrence Terry vs Allen University

Number: 2012CP4004857 **Court Agency:** Richland County Common Pleas **Filed Date:** 07/16/2012
Case Type: Common Pleas **Case Sub Type:** Personal Injury 350 **File Type:** Non-Jury
Status: Appeal **Assigned Judge:** **Disposition Judge:** Manning, L Casey
Disposition: Dismissed by Court - not Rule 40J **Disposition Date:** 09/17/2012
Source Doc: **Original Case #:**

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Description	Action Type	Begin Date	Completion
Amended Coversheet For Non Jury	Filing	07/18/2012 - 08:49:52	09/17/2012 - 0
Motion For An Expedited Non Jury Trial Date	Motion	07/20/2012 - 11:31:19	09/17/2012 - 1
Motion/Motion Filing Fee	Amount	07/20/2012 - 13:31:42	09/17/2012 - 1
verification/verified	Filing	07/26/2012 - 09:00:54	09/17/2012 - 0
Motions to Show Cause, For Sanctions, and To Dismiss	Motion	07/31/2012 - 12:12:07	09/17/2012 - 1
* Motion For Protective Order	Motion	06/08/2012 - 13:06:14	[Redacted]
Amended Complaint For Negligence and Intentional Infliction	Filing	08/10/2012 - 10:11:01	09/17/2012 - 1
Service/Affidavit Of Service on Allen University	Filing	08/10/2012 - 15:34:46	09/17/2012 - 1
Statement of Additional Facts For Motion For An Expedited No	Filing	08/17/2012 - 14:17:13	09/17/2012 - 1
Reply to Defendant's Motions to Show Cause, For Sanctions, a	Filing	08/17/2012 - 14:18:16	09/17/2012 - 1
Motion For Summary Judgment	Motion	08/27/2012 - 10:50:25	09/17/2012 - 1
Motion/Motion Filing Fee	Amount	08/27/2012 - 15:54:34	09/17/2012 - 1
* Motion For Protective Order	Filing	08/28/2012 - 11:25:18	[Redacted]
* Renewed Motion to Show Cause, For Sanctions, and to Dismiss	Filing	08/28/2012 - 11:28:42	[Redacted]
Brief in Support of Motion For Summary Judgment	Filing	09/11/2012 - 09:51:24	09/17/2012 - 0
Affidavit of Default	Filing	09/11/2012 - 10:35:39	09/17/2012 - 1
Motion/Motion Filing Fee	Amount	09/14/2012 - 08:39:55	09/17/2012 - 0

**PROOF OF SERVICE OF APPELLANT'S MOTION FOR CONTEMPT
AND SANCTIONS**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2012-CP-40-04857

Allen University,

Respondent,

v.


Lawrence Terry,

Appellant.

PROOF OF SERVICE

I certify that I have served copies of the Motion For APPELLANT'S MOTION FOR CONTEMPT AND SANCTIONS on Allen University by personally delivering the copies of it to his attorney of record, Debbie Whittle Durban, at her office at Post Office Box 11070 Columbia, South Carolina 29211, on July 5, 2013.

July 5, 2013


Lawrence Terry
Post Office Box 24138
Columbia, South Carolina 29224
(803) 414-0760
Appellant, Pro Se

RECEIVED

JUL 05 2013

SC Court of Appeals