

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
City of Columbia, SC,

Respondent,

v.

Marie Assa'ad-Faltas, MD, MPH,

Appellant.

Appellant's Notice of Supplemental Authority and Motion for Leave to Argue against Precedent.

Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") *pro se* respectfully brings to this Court's attention the U.S. Court of Appeals for the Sixth Circuit's 3 August 2023 *published* decision of *U.S. v. Liggins*, No. 22-1236 (6th Cir. 2023), available formally at <https://www.opn.ca6.uscourts.gov/opinions.pdf/23a0165p-06.pdf> and informally at least at <https://law.justia.com/cases/federal/appellate-courts/ca6/22-1236/22-1236-2023-08-03.html>


Dr. Faltas' initial brief argues that where *federal* due process rights are implicated, *federal* decisions bind, or at least persuade, this Court. As a judge's bias implicates due process, *Liggins* shows how words, even if later withdrawn or clarified, may show bias which violates due process and mandates recusal and new trial.

Otherwise, Appellant hereby seeks leave to argue against precedent to the extent that any precedent had previously held (always without analysis) that counties and municipalities have *inherent* "police power" and thus may *independently of the state* criminalize conduct and prosecute crime. Further, to the extent that precedent, again without analysis, *assumed* that courts "not of record" may exist, Appellant seeks leave to argue against that as is the first issue in her initial opening brief and as further detailed in her initial reply brief.

What may turn out to be a worse scandal than disbarred-Attorney Richard Alexander Murdaugh's insurance fraud and alleged financial crimes, the recent *allegations* of Colloton Clerk-of-Court Hill's misconduct in the recent submission in *State v. Murdaugh* before this Court show the importance of re-examination of the constitutionality (and wisdom) of balkanization of state sovereignty among a multitude of local state actors elected without the vote of *all* the state's people, who *indivisibly* are sovereign.

Dr. Faltas' initial and reply briefs showed how she is **ahead of her time in seeking to advance the law; i.e., the opposite of frivolous**. With that in an *open* mind, this Court should follow *Liggins, supra*, and allow Dr. Faltas to, God willing, be heard *pro se* in oral argument against precedent.

WHEREFORE, this motion should be granted as hereby sincerely sought on 8 September 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 8 September 2023, I served Ms. Jocelyn Baker, 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 Ms. Baker; all God so willing.


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

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SC Court of Appeals