

S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211-1629

Re: Bryan v. SEC, 2013-000760

Dear Clerk,

Respondent's Counsel S. Johnson & her co-employees are denying ^{my} meaningful & adequate access to the Courts. Per EXHIBIT #2 (all EXHIBITS attached) GA-01.03 §9.2 allows an I/M to receive legal books within one working day every day if they have a Court deadline. See EXHIBIT #14 General Counsel do not deny this. The problem is General Counsel find ways to deny it. Per EXHIBIT #5 General Counsel refer me to the warden. Why when it's their job!!! See EXHIBIT #3 the warden is confused! Per EXHIBIT #7 & #1 I wrote General Counsel on 5/21/13 per my 5/28/13 deadline, they ~~deny~~ ^{denied} me access by tactically waiting to the deadline ^{to} past, to reply. See EXHIBIT #6 their 6/14/13 reply. Per EXHIBIT #8, #9, & #10, I wrote directly to Counsel S. Johnson, Counsel in this case two others, with a copy of EXHIBIT #4 showing a Court deadline. Per EXHIBIT #14 they wrote back saying I am too early. Please note Per EXHIBIT #6 I was ^{to} late!!!

Per EXHIBIT #10, I am writing to Counsel in this case requesting that policy GA-01.03 §9.2 be followed & the ten days don't start until Respondent starts to follow it. Per EXHIBIT #11 I am being denied computer access!

WHEREFORE, I pray this Court order Counsel S. Johnson to ensure policy GA-01.03 §9.2 is followed & the ten days do not start until they start following the policy.

7/09/13, SC
dated
cc: S. Johnson/Counsel

Without prejudice,
X. T. Bryan, all rights reserved,
T. Terrell Bryan
#254538, SMU-TB19, MCCI
386 Redemption Way
McCormick, SC 29899

RECEIVED

JUL 12 2013

SC Court of Appeals

Responses and Replies

5:12-cv-03439-TMC-KDW Bryan
v. Cartledge

KDW-Inmate

U.S. District Court

District of South Carolina

Notice of Electronic Filing

The following transaction was entered by Pruitt, Steven on 5/17/2013 at 1:59 PM EDT and filed on 5/17/2013

Case Name: Bryan v. Cartledge
Case Number: 5:12-cv-03439-TMC-KDW
Filer: L Cartledge
Document Number: 43

Docket Text:

RESPONSE in Opposition re [39] MOTION for Sanctions Response filed by L Cartledge.Reply to Response to Motion due by 5/28/2013 (Attachments: # (1) Certificate of Service)(Pruitt, Steven)

5:12-cv-03439-TMC-KDW Notice has been electronically mailed to:

Steven Michael Pruitt spruitt@mcdonaldpatrick.com, lbrooks@mcdonaldpatrick.com

5:12-cv-03439-TMC-KDW Notice will not be electronically mailed to:

T Terell Bryan
#254638
McCormick Correctional Institution
386 Redemption Way
McCormick, SC 29899

EXHIBIT
#1

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP-dcecfStamp_ID=1091130295 [Date=5/17/2013] [FileNumber=5575344-0] [5571d2e989039d9df9f70bcca6cb3ed8f8516ce9802b5edbf4624530208e47ff875dce0ba7fee9e6eb707e649d61bb30008f656c7c19d8e177368ce237be7c2]]

Document description:Certificate of Service

2/20/2013 10:00 AM

GA-01.03

9. MAXIMUM SECURITY UNIT (MSU), SPECIAL MANAGEMENT UNIT (SMU); INMATE ACCESS TO THE LAW LIBRARY: To ensure equal access to the courts, inmates in Special Management Unit (Pre-Hearing Detention, Security Detention, Protective Custody, Safekeeper) and the Maximum Security Unit will be authorized to request and receive law materials from the law library in their cells as follows: (No law materials will be maintained in an SMU or in the MSU, however Warden's may allow the SMU or MSU to maintain current copies of commonly requested SCDC Policies/Procedures for use by inmates. The Warden must ensure that these copies are properly updated with appropriate changes.) (3-4256)

9.1 When an inmate is placed in the Security Management Unit (Pre-Hearing Detention, Security Detention, Protective Custody, Safekeeper) *s/he will have access to a copy of the reference packet prepared by the Office of General Counsel titled "How to Use the Law Library."* When an inmate is placed in the Maximum Security Unit, the inmate will be given a copy of this reference packet.

9.2 An inmate may, at any time, complete an SCDC Form 9-2, "Law Book Request," to request up to three (3) law book(s) or SCDC policies/procedures. It is the inmate's responsibility to date this form. Verbal requests will not be sufficient. The Officer or staff member receiving the request will write the date and time that s/he was given the same on the SCDC Form 9-2, "Law Book Request." Within three (3) working days (Monday through Friday with holidays excluded), the institutional Librarian/designee will ensure that the inmate receives up to three (3) of the books or SCDC policies/procedures that the inmate requested on the SCDC Form 9-2, "Law Book Request," provided that the books or policies/procedures are available *and are not restricted*. (NOTE: Books and policies/procedures will be distributed on a first-come, first-served basis. Restricted policies/procedures will not be provided to inmates.) These books/materials will come from the institutional satellite and/or core law library and will be delivered to the inmate after the library has closed for the evening/weekend. [NOTE: If the inmate can demonstrate a pending court deadline, the books will be delivered to his/her cell within one (1) working day (Monday through Friday with holidays excluded).] With the approval of the Warden, law clerks may be allowed to deliver and pick-up law books from the SMU. Once the book has been brought to the inmate, this date and time will then be indicated on the SCDC Form 9-2.

EXHIBIT #2

9.3 If the inmate requires further assistance in completing the "Law Book Request" or in locating information kept in the law library, s/he may request additional assistance from the Librarian or his/her designee.

9.4 The inmate will be permitted to keep the law materials for one (1) evening. In the morning, prior to the law library opening, the institutional Librarian or designee will return to the unit, and the inmate will be required to return the materials. (NOTE: If the materials are delivered to the inmate on a Friday evening and if the library is closed for the weekend, s/he may be permitted to keep the books until Monday morning. Likewise,

RECEIVED

JUL 12 2013

SC Court of Appeals

A/Warden Parker
T. Terrell Bryan
mcl:1

REQUEST

6/24/13
254638
SMU-319

To: Shanika K. Johnson,

Per the court's bailiff's letter to me "cc:" to you, I have ten days to correct the deficiency, & the ct's order gives me 15 days to pay filing fees, quoting Ex Parte Martin. I need to research the Martin case & study the SCACR. I request that you contact the law library, per GA-01.0389.2 & tell them to deliver the books to me within one working day.

I request: Ex Parte Martin, 471 S.E.2d 134 (1995).
① SCACR

cc: A/Warden Parker.

Re T.T. Bryan # 254638

I have not received a "cc" copy from the Court or from you, concerning your legal work.

Are you aware of the Law Library computer on SMU? You may do your legal research on the Law Library Computer on SMU.

REVIEWED

JUN 27 2013

ASSOCIATE WARDEN
PROGRAM & SERVICES
MCCORMICK CI

[Signature] A/W 6/27/13

EXHIBIT
#3



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CAROLYN TAFT GROSBOLL
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

June 17, 2013

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, Illinois 60601-3103
(312) 793-1332
TDD: (312) 793-6185

Mr. T. Terrell Bryan
#254638, SMU-B19, MCCI
386 Redemption Way
McCormick, South Carolina 29899

RE: M13228 - T. Terrell Bryan, movant, v. Lundbeck, Inc., et al. Supervisory Order

Dear Mr. Bryan:

This will acknowledge receipt of your letter on June 6, 2013. In response to your request, you will find enclosed with this letter a copy of Illinois Supreme Court "Rule 383. Motions for Supervisory Orders".

Further, your *pro se* motion by movant for a supervisory order, filed May 22, 2013, is currently pending decision by the Court. The Court will be considering your motion during the 2013 September Term of Court, and you will be advised by mail of the Court's decision when it is announced thereafter.

Very truly yours,

Carolyn Taft Grosboll

Clerk of the Supreme Court

CTG:wb
Enclosure

EXHIBIT
#4

**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
OFFICE OF GENERAL COUNSEL
RESPONSE TO INMATE CORRESPONDENCE**

TO: Inmate Terance Bryan
SCDC #: 254638
INSTITUTION: McCormick CI
FROM: Dayne Haile
DATE: May 24, 2013
RE: Your Correspondence Dated May 22, 2013

EXHIBIT
#5

Inmate Bryan, your correspondence will be forwarded to Warden Cartledge as to your law library access.

S/ Dayne Haile
Dayne Haile

cc: Warden
Inmate Records

Dear Haile,

6/07/13

The office of General Counsel is over the law library not the warden. Warden Cartledge will take no action to see that policy GA-01-03 §9.2 is followed. You have violated Rule 407, SCACR, Rule 3.4 fairness to opposing party & Counsel, your office is representing SCOC is my grievance appeals & your office has instructed person over the law library to deliver law books only once a week.
Please correct your misconduct.

cc: Warden Cartledge

**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
OFFICE OF GENERAL COUNSEL
RESPONSE TO INMATE CORRESPONDENCE**

TO: Inmate Terance Bryan
SCDC #: 254638
INSTITUTION: McCormick CI
FROM: Chris Florian
DATE: June 14, 2013
RE: Your Correspondence Dated May 21, 2013

EXHIBIT
#6

This is past your deadline.

S/



Chris Florian

cc: Warden
Inmate Records

REQUEST

RECEIVED

MAY 22 2013

GENERAL COUNSEL

Chris Florian / SCOC's Staff Attorney
T. Terrell Bryan
MCC

slab 13
254638
smv-b19

To: C. Florian

per EXHIBIT A I have a court deadline due slab 13. per policy GA-DL-0389.2 if I show a court deadline the books are to be delivered within one working day please see that this policy is honored.

cc: Corp. Mktg / Law Library

EXHIBIT #7

RECEIVED

JUN 10 2013

GENERAL COUNSEL

Office of General Counsel
Oran Hale

GENERAL COUNSEL

JUN 10 2013

MAIL ROOM
MCC

JUN 07 2013

RECEIVED

The Department of Corrections has not censored this. Therefore the department does not assume the responsibility for its contents.

Terrell Bryan
TS-19, MCC

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REQUEST TO STAFF MEMBER

RECEIVED
JUN 27 2013
GENERAL COUNSEL

TO: NAME: Chris Florian / SCDC's staff Attorney	TITLE:	DATE: 6/24/13
INMATE'S NAME: T. Tecell Bryan	SCDC #: 254638	
INSTITUTION: MCC I	LIVING QUARTERS: SMU-119	

To: C. Florian,
Per EXHIBIT #4, attached - 6/17/13 letter from the S.Ct. of Ill., I have a court deadline due about September 2013. I have to file an amendment. I need additional computer access & law books access. Per policy GA-01.033A.2 if I show a court deadline the books are to be delivered within one working day.

Please see that this policy is honored.

cc: D. Tatarstky / General Counsel

EXHIBIT
#8

DISPOSITION BY STAFF MEMBER:

DATE:	SIGNATURE:
-------	------------

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REQUEST TO STAFF MEMBER

RECEIVED
JUN 27 2013

GENERAL COUNSEL

TO: NAME: Shanika K. Johnson / SCDC's Staff Attorney	TITLE: Staff Attorney	DATE: 6/24/13
INMATE'S NAME: T. Terrell Bryan		SCDC #: 254638
INSTITUTION: MCCI		LIVING QUARTERS: SMU-B19

To: Shanika K. Johnson,
Per the Court's 6/21/13 letter to me "cc:" to you, I have ten days to correct the deficiency, & the Ct.'s order gives me 15 days to pay filing fees, quoting Ex parte Martin. I need to ~~for~~ research the Martin case & study the SCACR. I request that you contact the law library, per GA-01.0359.2 & tell them to deliver the books to me within one working day.

I request: Ex parte Martin, 471 S.E.2d 134 (1995)
& SCACR

cc: A/Warden Parker

EXHIBIT
#9

DISPOSITION BY STAFF MEMBER:

DATE:	SIGNATURE:
-------	------------

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REQUEST TO STAFF MEMBER

RECEIVED
JUN 27 2013

GENERAL COUNSEL

TO: NAME: O. TATARSKY / General Counsel	TITLE:	DATE: 6/24/13
INMATE'S NAME: T. Terrell Bryan	SCDC #: 254638	
INSTITUTION: MCC-II	LIVING QUARTERS: SMV-B19	

To: C. Florian,
Per EXHIBIT #4, attached - 6/17/13 letter from the S.Ct. of Ill.,
I have a court deadline due about September 2013. I have to file an amendment. I need additional computer access & law books access. Per policy GA-01.0339.2 if I show a court deadline the books are to be delivered within one working day.

Please see that this policy is honored.

cc: O. Tatarsky / General Counsel

EXHIBIT #10

DISPOSITION BY STAFF MEMBER:

DATE:	SIGNATURE:

REQUEST

Lt. Thompson/Lt. Terry
Teren Bryon
MCCI

6/10/13
254538
SP11-B19

To: Lt. Thompson/Lt. Terry

I request to use the Computer, I've been denied for the last 3 weeks. I have court deadlines.

I am requesting that night shift handle this.

Cc: Capt. Stevens

EXHIBIT
#11

**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
OFFICE OF GENERAL COUNSEL
RESPONSE TO INMATE CORRESPONDENCE**

TO: T. Terell Bryan
SCDC #: **254638**
INSTITUTION: McCormick CI
FROM: Office of General Counsel
DATE: July 1, 2013

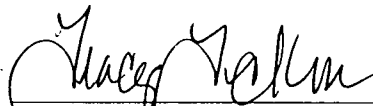
I received your request to staff member forms dated June 24, 2013 addressed to Chris Florian and David Tatarsky requesting additional computer access and access to the law library per policy G.A. -01.03.

I have also received your request to staff member form dated June 24, 2013 addressed to Shanika Johnson requesting a copy of Martin v. State, 321 S.C. 533, 471 S.E.2d 134 (1995).

I have reviewed policy G.A. -01.03 § 9.2. There is no provision for extended computer access or extended access to the law library. Additionally, the provision provides for materials to be delivered within one working day if there is a pending court deadline. A pending court deadline is defined as a court deadline of 30 days or less. Your documentation indicates that your deadline is September 2013. Therefore, your deadline is not within the 30 day or less requirement.

Additionally, I have attached a copy of the Martin case for your review.

If you have further questions or concerns, please contact the office.



Tracey Tucker

EXHIBIT
#14



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMTER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

July 02, 2013

Terence Terrell Bryan, 00254638
McCormick Correctional Institution
386 Redemption Way
McCormick SC 29899

EXHIBIT #16

Re: Terrell Bryan v. SCDC (12)
Appellate Case No. 2013-000760

Dear Counsel:

Upon reviewing your motion to stay, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The required filing fee has not been submitted. The correct filing fee is \$25. Failure to provide the filing fee will result in the motion not being considered by this Court.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Shanika Kenyetta Johnson