

In The Court Of Appeals

APPEAL FROM GREENVILLE COUNTY COURT OF COMMON PLEAS

Hon. Charles B. Simmons Jr.

C.A. No. 2020-CP-23-00939

Appellate Case No. 2020-001699

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SC Court of Appeals

Kenneth Curtis, Respondent

v.

Cynthia J. Glenn, Appellant

RESPONDENT'S MOTION IN OBJECTION AND MOTION TO DISMISS

Respondent Kenneth Curtis having been served Appellant's Motion to Proceed In Forma Pauperis....


1) Respondent Kenneth Curtis would object to Appellant's Motion to Proceed In Forma Pauperis and demands strict proof thereof of her financial status. Ms. Glenn is an advertised licensed birthing professional with physical offices, as well as a large personal property owner. Glenn is well capable of meeting the complete Court Record and Brief requirements of Appellate Court Rule 210. Her sworn testimony by motion before this Court is quite simply a lie that should not be entertained nor tolerated and this case should be dismissed. If the Court in all largess were to allow Glenn her pauper claim, Respondent motions the Court demand of Glenn production of a Full Financial Record and Disclosure Statement to determine her eligibility

Cynthia Glenn is a vexatious litigant that uses her Pro Se status to badger and punish through lawsuit. Glenn has a vast record of court cases and filings and knows very well the cost and obligations associated with pursuing litigation. Her volumus Pro Se filings cost her nothing while she panders and solicits the power of the court. Glenn has caused enormous costs to the courts as well as to Respondent and now wishes to plead poverty for herself even while claiming "Local work obligations" in her brief as reasoning why she cannot deliver copies.

2) Appellant Cynthia Glenn has not, as required under Rule 210, produced and served a Full Transcript in this case. She seeks to proceed with a "partial" transcript that leaves out huge portions of statements and testimonies specifically referred to in her pleadings. Allowing Glenn to proceed without a full transcript would make it impossible for Respondent Curtis to defend himself or respond to Glenn's claims.

THEREFORE: Respondent Kenneth Curtis Motions the Court to dismiss this case.

Respondent Signature


KENNETH E. CURTIS 2-3-23

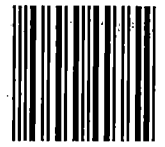
Kenneth E. Curtis, Pro Se

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29661



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SC Court of Appeals

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