

**APPELLANT'S REPLY TO RESPONDENT'S RETURN TO
APPELLANT'S MOTION FOR EXTENSION OF TIME AND
CLARIFICATION ON RECORD OF APPEAL**

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 29 2013

SOUTH CAROLINA COURT OF APPEALS

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As the case file shows the Appellant has already filed a Record of Appeal with Proof of Service. The doctored documents in question will be added via Supplemental Record under Rule 212, with other potential documents to be included too. This will all be determined by the rulings on the pending motions and why an extension of time is needed before finalizing the Record of Appeal.

The Appellant contacted the Respondent to inform them that #20 and #22 on Respondent's Designation Of Matter To Be Included In The Record On Appeal could not be included in the Record On Appeal because they did not comply with Rule 210(c), as neither were present on the docket or in the case file during the rendering of the lower courts order(s). The Respondent's attorney, Debbie Durban, stated in her affidavit submitted to this court that she

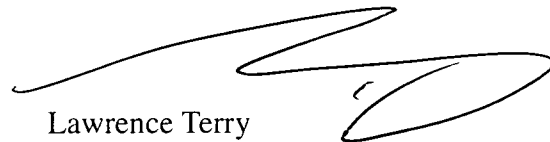
contacted the Clerk of Court on February 20, 2013 to correct the multiple mistakes she made five months prior. The surreptitious alterations to material evidence and the lower court docket were made on February 22, 2013. This trickery was done without a motion or an order instructing the Clerk of Court to do so **AND without notice to the Appellant.**

Based on the previously stated dates of alterations it is evident that the proposed documents were not present during the rendering of the lower court's orders and therefore cannot be included in the Record of Appeal. When brought to the Respondent's attention they vigorously argued against the expunging of those surreptitiously altered documents. The Appellant is represented Pro Se and understands the seriousness of the court rules and procedures. The Appellant could rightfully proceed with completing the Record of Appeal with the deletion of the documents that were not presented to the lower court but out of precaution for the Respondent I felt it was more appropriate to motion this court for clarification.

The documents supplied with the motion prove that Allen University and Debbie Durban received notice of the issues with their filings and multiple failures to act or respond at least five months prior to their surreptitious alterations to evidence. The Appellant would be truly prejudiced if the spurious documents are allowed to remain. This Appeal is strongly based on the material facts that the Respondent failed to reply to the Amended Complaint and by their failure to respond to the Initial Requests For Admissions all were deemed admitted. If the doctored documents were allowed to remain the bulk of the Pro Se Appellant's properly filed documents in the lower court would now be voided. That is not fair or right.

Therefore, the Appellant respectfully requests Sanctions on Debbie Durban and/or Allen University as deemed proper by the court, and relief through having the Clerk of Court instructed to remove the surreptitiously altered motions, and to rule on this Appeal in favor of the Appellant and against the Respondent.

July 29, 2013



Lawrence Terry
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Appellant, Pro Se

**PROOF OF SERVICE OF APPELLANT'S REPLY TO RESPONDENT'S
RETURN TO APPRLANT'S MOTION FOR EXTENSION OF TIME
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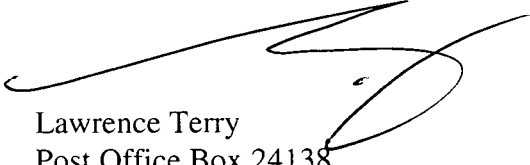
Lawrence Terry,

Appellant.

PROOF OF SERVICE

I certify that I have served copies of the Motion For APPELLANT'S REPLY TO RESPONDENT'S RETURN TO APPRLANT'S MOTION FOR EXTENSION OF TIME AND CLARIFCATION ON RECORD OF APPEAL 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 29, 2013.

July 29, 2013


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