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SOUTH CAROLINA
COURT OF APPEALS

Terence L. Rush,
Appellant,

Trial Court Case No. 2020 CP360506
Appellate Case No. 2021 - 000317

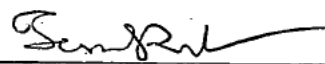
v.

Michael B. Stribble, Individually and in
his Official capacity as Sergeant at the
Newberry County Sheriff's Office, et al.,
Respondent(s).

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MAR 04 2024
SC Court of Appeals

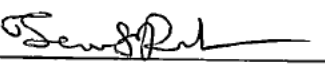
NOTICE OF MOTION AND MOTION REQUESTING LEAVE OF COURT TO
TAKE DEPOSITIONS UPON WRITTEN QUESTIONS

Appellant, Terence L. Rush, COMES before this Honorable Court giving
notice of his intention to file a motion requesting Leave of Court to take
depositions upon written questions of respondent, Michael B. Stribble.


Terence L. Rush

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I place a correct copy of this document in the hands of
a Wakulla Corr. Inst. - Mail Room official to be delivered to: Riley Pope & Laney, LLC.,
2838 Devine Street, Columbia, S.C. 29205, Elizabeth Pope, Clerk of Court Newberry
County Court of Common Pleas, P.O. Drawer 10, Newberry, S.C. 29108, and to the South
Carolina Court of Appeals, Jenny Abbott Kitchings, Clerk, Post Office Box 11629, Columbia,
S.C. 29211 by U.S. Postal Mail delivery on this 27th day of February, 2024.


Terence L. Rush, Sui Juris,
% RUSH, TERENCE L., # E03490
Wakulla Corr. Inst. - Main
110 Melaleuca Drive
Crawfordville, FL 32327

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SC Court of Appeals

Terence L. Rush,
Appellant,

Trial Court Case No. 2020CP3660506

Appellate Case No. 2021-000817

v.

Michael B. Stribble, Individually and in
his Official capacity as Sergeant at the
Newberry County Sheriff's Office, et al.,
Respondent(s).

MOTION REQUESTING LEAVE OF COURT TO TAKE DEPOSITION UPON

WRITTEN QUESTIONS.

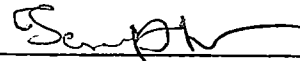
Pursuant to South Carolina Rules Civil Procedure (SCRCP) Rule 27 (b), SCRCP Rule 31, and SCRCP Rule 30, the Appellant, Terence L. Rush, Request Leave of Court to take Deposition Upon Written Questions to Respondent, Michael B. Stribble, Individually and in his Official capacity as Sergeant at the Newberry County Sheriff's Office. The Appellant stipulates that Michael B. Stribble can respond to the questions under penalty of perjury with a signed jurat oath before a notary public or deputy Clerk of Court that the answers to the written deposition are truthful, accurate, trustworthy and his own.

Respondent, Michael B. Stribble the Individual and the Sergeant in his Official Capacity as a Sergeant at the Newberry County Sheriff's Office can be reached and subpoenaed ^D for being deposed at his attorney's address of Riley Pope & Laney, LLC., 2838 Devine Street, Columbia, S.C. 29205. The Respondent shall have 30 days to respond and return, submitting his answers under notary seal and annexing original documents to the Court and copies of these requested documents pertaining to the written questions back to this Honorable Court and Appellant.

The substance of the Respondent's deposition the Appellant expects to elicit revolve around his probable cause for the date in question, statements or opinions of fact, the
i. Subpoena for deposing Michael B. Stribble enclosed.

application of law to fact, and documents available for copying and inspection with regard to his probable cause for the date in question with regards to this case. The Appellant seeks to preserve the information and whereabouts of documents that might be lost or destroyed due to the length of time it is taking to receive justice for defending the Constitution of the United States Fourth Amendment against any and all threats be they foreign or domestic, which is the Appellant's right as a citizen of the United States of America and any state of this Union which he may reside.


WHEREFORE, the Appellant is seeking this Honorable Court to grant his motion and issue an order ^② allowing deposition to be taken upon written questions ^③ in the manner and under the conditions stipulated and as are prescribed by the rules of SCRPC.



Terence L. Rush, Sui Juris

CERTIFICATE OF SERVICE

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Terence L. Rush, Sui Juris,
% RUSH, TERENCE L., #E03490
Wakulla Corr. Inst.- main
110 Melaleuca Drive
Crawfordville, FL 32327

- 2. Proposed Order of Court
- 3. Written Question enclosed

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Terence L. Rush,
C/O RUSH, TERENCE L. #E03490
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110 MELALEUCA DRIVE
CRAWFORDVILLE, FL 32327

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