

Randal K. Freeman
8 Warren Ct
Sumter, SC 29150
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(224) 407-1660

August 26th, 2024

Clerk of the Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Motion for Restraining Order and Preliminary Injunction in Randal K. Freeman v. David Bryan Trapp, Case No. 2024OR4310100110

Dear Clerk,

I am writing to you pro se in my capacity as the appellant in the case of Randal K. Freeman v. David Bryan Trapp, bearing Case No. 2024OR4310100110. I wish to bring to the attention of the South Carolina Court of Appeals a motion for a restraining order and preliminary injunction that I have recently filed against the respondent, David Bryan Trapp. This action was taken in the Summary Court of Sumter, South Carolina, and is a direct response to Mr. Trapp's ongoing harassment and intimidation directed at me and my family. It is my belief that these actions are deliberately aimed at pressuring me to abandon my legal pursuit.

A hearing regarding this motion has been scheduled for September 5th, 2024, at 10:00 am. The necessity for this motion arises from Mr. Trapp's repeated violations of my rights and his blatant disregard for the law, specifically under the South Carolina Residential Landlord and Tenant Act, and the statutes concerning harassment and intimidation, including but not limited to S.C. Code Ann. § 16-9-340 (Intimidation of Court Officials, Jurors, or Witnesses) and S.C. Code Ann. § 16-3-1700 (Definitions of Harassment and Stalking).

Importantly, Mr. Trapp's actions of harassment and intimidation have occurred during the pendency of the motions and actions I have submitted to the South Carolina Court of Appeals in my ongoing appeals case. I believe these actions are directly correlated to an attempt to hinder my ability to complete the deadlines and requirements necessary for the appeals process currently in the custody of the South Carolina Court of Appeals. By disrupting my ability to focus on and respond to the Court's directives, Mr. Trapp is seeking to undermine the integrity of the judicial process and prevent me from fully exercising my legal rights.

Specific Incidents of Harassment/Stalking:

- 07/08/2024, 10:12 AM, at 8 Warren Ct, Sumter, SC: Defendant drove by, taking pictures of and harassed the plaintiff's children. Sumter Police Department Report# SPD24004309

- 07/09/2024, 08:45 AM, at 8 Warren Ct, Sumter, SC: Defendant repeated his actions, further intimidating the plaintiff and his family. Sumter Police Department Report# SPD24004309
- 07/10/2024, 10:48 AM, at 8 Warren Ct, Sumter, SC: Continued pattern of harassment by driving by and taking pictures of the appellant's family. Sumter Police Department Report# SPD24004309
- 07/11/2024, 2:46 PM, at 8 Warren Ct, Sumter, SC: Persisted in harassment by driving by and taking pictures of the appellant and his wife outside his property. Sumter Police Department Report# SPD24004309
- 08/12/2024: Actions warranted a violation under SC Law 16-3-1700(A) 1st Degree harassment as per Sumter Police Department report# SPD24004982.
- 08/18/2024: Harassment escalated when Defendant entered the property without notice to fix a sign, in violation of SC Residential Landlord and Tenant Act, Sections 27-40-530(c) and (d). Sumter Police Department Report# SPD24005118
- 08/21/2024: Once again Harassment escalated when Defendant entered the property without notice to move a sign, in violation of SC Residential Landlord and Tenant Act, Sections 27-40-530(c) and (d). He stopped outside the appellant residence for a second time that day pointing directly at the appellants family and took photos of them. Sumter Police Department Report# SPD24005198

The respondent's recent correspondence with the court and Supreme Court justices, which I have included as part of my motion, serves as further evidence of his attempts to interfere with the judicial process. This correspondence, I argue, is part of a broader strategy to harass me into dropping my case, an action that not only undermines the integrity of the judicial system but also violates explicit statutes designed to protect individuals from such intimidation.

Given these circumstances, I respectfully request that the Court of Appeals take cognizance of this motion and the serious allegations it raises. Mr. Trapp's actions not only constitute a direct violation of specific South Carolina laws but also represent a blatant attempt to undermine the legal rights and protections afforded to me.

I am prepared to provide any additional information or documentation the Court may require in relation to this motion. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Randal K. Freeman', written over a horizontal line.

Randal K. Freeman

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

R.Ferrell Cothran, Jr., Circuit Court Judge

Case No. 2024-CP-43-000366

Randal K Freeman, Appellant,

v.

David Bryan Trapp, Respondent.

PROOF OF SERVICE

I certify that I have served the a copy of the Correspondence Letter dated 08/26/2024 Addressed to Clerk of Court of Appeals on David Bryan Trapp by depositing a copy of it in the United States Mail, postage prepaid, on August 26th, 2024, addressed to his attorney of record, J.Benjamin Cahill, 693 N. Guignard Drive Sumter, South Carolina 29150.

August 26th, 2024

/s/Randal K Freeman
Randal K Freeman
8 Warren Ct
Sumter SC 29150
(224) 407-1660