

Margie Brown

Vs

State of South
Carolina

FILED

2024 SEP -6 PM 1:06

JULIE J. ARMSTRONG
CLERK OF COURT

BY: MSS

RECEIVED

Aug 30 2024

SC Court of Appeals

RECEIVED

Sep 06 2024

SC Court of Appeals

2022A1010202600

MOTION TO APPEAL COURT OF APPEAL DECISION

The Defendant Margie Brown is filing this appeal on the grounds of negligence, racism and extreme prejudice. 18. US 242.18.US 1986 18.US 1985 #3 The Defendant was denied Due Process. Jenny Abbott Kitchings conspired to deprive the Defendant of her Civil Rights.

#1. At all times relevant the defendant filed Notice of Appeal on Aug 9/2024 at 10:40 am. With Charleston County Clerk of Court. Charleston County Court were closed for 72 hours during storm Debbie. On Aug 8/2024 The Defendant phone calls went directly to voicemail. The Defendant was calling the Court of Appeals during Business hours. The Defendant emails to the Court of Appeal to asking for clarification about the if, Charleston residents would be given additional time to file documents, seeing as though the courts were closed. The Defendants phone calls and emails were never returned.

#2. At all times relevant on or around Aug 17/2024 the Defendant received an informed delivery form USPS. Alerting her that she had mail from the court of App On Aug 19/2024 the Defendant contacted the Court of

Appeals at or around 1:15. The Defendant was informed the Jacqueline was the case manager assigned to the case. The Defendant asked to speak with Jacqueline. The Defendant was informed that Jacqueline was out to lunch. The Defendant Stated that her PO BOX was compromised because the keys were stolen. She would not be able to retrieve her mail. The Defendant asked if her mail could be sent by email. The plaintiff spoke with Shelby. Shelby informed the Defendant to email a letter to the Court of Appeals. ON Aug 19/2024 The Defendant emailed a letter requesting her mail be sent by email.

#3. At all times relevant on Aug 19/2024 the Defendant called the court pf Appeals back at or around 2PM. Asking to speak with her case manager. The Defendant received the voicemail. The Defendant left a detailed massage, requesting a call back. The call was never returned. The Defendant spoke with Shelby. Shelby stated Jacqueline had left for the day. The Defendant stated she had sent the letter vi email. Shelby stated that the Court of Appeals had received the Defendant email. Shelby emailed the Defendant a copy of the deficiencies letter. Dated Aug 16/2024. The letter stated that there was issue with the Proof of Service. The Defendant never received a deficiencies in regards to the Notice of Appeal.

#4. At all times relevant The Defendant corrected the Proof of Service within the 15 days that was mandatory by the Court Of Appeals. on Aug 20/2024 The Defendant served the Proof of Service on Charleston County Clerk of Court at 9:00 AM. The Defendant emailed a copy of the Proof of Service to the Court of Appeals at 9:33 AM. The Defendant called the Court of Appeals asking to speak with her case manager. The Defendant was told that she was out of the office. The Defendant asked to leave a massage on the voice mail. The Defendant called the Court of Appeals back and asked if the Proof of Service had any deficiencies. The Defendant was told no. The Defendant asked if there was any other issues with the case. The Defendant was told no.

#5. At all times relevant on Aug 22/2024 the Defendant contacted the court of Appeals asking to speak with her case manager. The Defendant was told she was not available. The Defendant asked could she leave a voice mail. The Defendant call was never returned. The Defendant called the Court of Appeals Back the Defendant asked to speak with her case manager supervisor. A woman with alleged name Stormy alleged. She was Jacqueline supervisor, the Defendant aske if there was any deficiencies with the Proof of Service. Stormy said no. The Defendant asked if there were any other issues with the case Stormy said no.

#6. At all times relevant on Aug 28/2024 the Defendant received an informed delivery from USPS. The Defendant called the Court of Appeals at or 8:40 am the Defendant calls went straight to voice mail. The Defendant contacted the court of Appeals ay or around 4;34 pm. The Defendant spoke with Shelby. Shelby stated the letter was address to attorney Kevin Hales and the courts had sent the Defendant a copy. The Defendant asked Shelby to please email her a copy of the letter. Shelby sent the Defendant a copy of the letter. It was addressed to the Defendant not Attorney Kevin Hales. The letter was dismissal letter. Stating the Notice Of Appeal filed on Aug 5/2024 was not timely served.

#7. The Notice of Appeal was filed on Aug 9/2024 with Charleston County Clerk of Court at 10: 40 am. The Court OF Appeals emailed the Defendant stating that the Court had received the Notice of Appeal. When the Court Of Appeals contacted the Defendant on Aug 16/2024 with the deficiencies letter. For the Proof of Service with instruction on the correction. The Notice of Appeal was not include. The Defendant spoke with multiple Court of Appeals case manager asking if there were any other issues with the case. The Defendant was told no. On Aug/28/2024 the Defendant emailed Shelby about the misleading information. The defendant also sent emails to the Court of Appeals asking to file a complaint. The emails were not returned.

#8. At all times relevant on Aug 29/2024 the defendant called the Court of Appeals at or around 8:53 AM. The Defendant calls were sent straight to voice mail. The Defendant called 803-734-1891 the Defendant reached Jenny Abbott Kitchings the Defendant stated that she was trying to reach her case manager, but her calls were going directly voice mail. The Defendant asked if she could be transferred. Jenny Abbott Kitchings said no, there is nothing we can do for you, and hung up. The Defendant called back. Stating that she had been trying to reach her case manager since Aug 8/2024, and that her case manager had never returned her call. Jenny Abbott Kitchings Stated that the defendants' calls were not returned by her case manager. Because she instructed her not to return the defendant's calls. Why would Jenny Abbott Kitchings do that? Jenny Abbott Kitchings

doesn't know the Defendant personally. Jenny Abbott Kitchings shouldnt have a personal vendetta against the defendant. Jenny Abbott Kitchings maliciously singled the Defendant out and maliciously instructed the Defendant case manger not to assist her with the case. What was Jenny Abbott Kitchings motive for such outrageous behavior? Jenny Abbott Kitchings is a racist and used extreme prejudice deception against the defendant.

FILED

2024 SEP -6 PM 1:06

JULIE J. ARMSTRONG
CLERK OF COURT

BY _____

Morgan BTD

Spencer, Shelby

From: sspencer@sccourts.org

To: brown.margie@aol.com

Mon, Aug 19 at 4:58 PM

Dear Ms. Brown,

Attached is a copy of this Court's letter dated August 15, 2024.

Warmly,

Shelby Spencer

Team Lead - Civil

South Carolina Court of Appeals

1220 Senate Street

Columbia, SC 29201

P: 803-734-1890

E-Filing Email: ctappfilings@sccourts.org

Website: www.sccourts.org

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Deficiency - Deficiency Letter Sent (Proof of Service) (3).pdf

60.1kB

**The State v. Margie Brown**

[brown.margie@aol.com/Inbox](mailto:brown.margie@aol.com/Inbox)

**Spencer, Shelby**

**From:** [sspencer@sccourts.org](mailto:sspencer@sccourts.org)

**To:** [brown.margie@aol.com](mailto:brown.margie@aol.com)

Wed, Aug 28 at 4:37 PM

# Shelby Spencer

Team Lead - Civil  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
P: 803-734-1890  
E-Filing Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
Website: [www.sccourts.org](http://www.sccourts.org)

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Order of Dismissal (8).pdf

86.7kB

Margie Brown

From: brown.margie@aol.com

To: ctappfilings@sccourts.org

Tue, Aug 6 at 4:45 PM

I have a quick question. The notice of appeal for general sessions is form #4 is for sentencing? I don't see a general sessions form for court orders. Would they be one and the same?

Sent from AOL on Android

On Tue, Aug 6, 2024 at 4:37 PM, Margie Brown

<brown.margie@aol.com> wrote:

I was just making sure the address was correct. Thank you

Sent from AOL on Android

On Tue, Aug 6, 2024 at 3:54 PM, Court Of Appeals Filings

<ctappfilings@sccourts.org> wrote:

There doesn't appear to be anything attached to the email. Please try resending with the attachments.

From: Margie Brown <brown.margie@aol.com>

Sent: Tuesday, August 6, 2024 3:53 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Subject:

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Sent from AOL on Android

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7:50

89%



+180373418...  
Number Verified

TODAY

➤ Outgoing call 10sec  
Aug 29, 8:58 AM

➤ Outgoing call 3sec  
Aug 29, 9:00 AM

➤ Outgoing call 44sec  
Aug 29, 9:03 AM

➤ Outgoing call 1min 25sec  
Aug 29, 9:04 AM

❌ Missed call   
Aug 29, 9:27 AM


➤ Outgoing call 47sec  
Aug 29, 10:46 AM



Call    Video call    Message



TODAY

➤ Outgoing call   
Aug 29, 8:53 AM

10sec

➤ Outgoing call   
Aug 29, 8:54 AM

10sec

➤ Outgoing call   
Aug 29, 8:54 AM



10sec

➤ Outgoing call 


7:24


87%

Search contacts







Older

 1 803-734-1890  
 Aug 19 at 3:07 PM

 1 803-734-1890  
 Aug 9 at 10:44 AM • 00:20

00:00 — 00:20

 Call 1 803-734-1890

 Create new contact

 Add to a contact

 Send a message

 Block number




★ Favorites    ⌚ Recents    👤 Contacts    ✉ Voicemail



➤ Outgoing call   
Aug 19, 12:30 PM

45sec

➤ Outgoing call   
Aug 19, 12:32 PM

7min 58sec

➤ Outgoing call   
Aug 19, 1:56 PM

➤ Outgoing call   
Aug 19, 1:57 PM

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➤ Outgoing call   
Aug 19, 2:10 PM

5min 55sec

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10:36

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- Outgoing call 45sec  
Aug 19, 12:30 PM
- Outgoing call 7min 58sec  
Aug 19, 12:32 PM
- Outgoing call 31sec  
Aug 19, 1:56 PM
- Outgoing call 5min 55sec  
Aug 19, 1:57 PM
- Outgoing call 7sec  
Aug 19, 2:10 PM
- Outgoing call 7sec  
Aug 19, 2:32 PM



Call

Video call

Message



10:37

LTE 74%



+180373418...



Number Verified



Outgoing call 53sec  
Aug 9, 10:36 AM

Outgoing call 1min 18sec  
Aug 9, 10:37 AM

Missed call  
Aug 9, 10:43 AM



Call



Video call



Message



10:35

LTE 74%



18037341890



Outgoing call 10sec  
Aug 28, 8:42 AM

Outgoing call 10sec  
Aug 28, 8:48 AM



Call Video call Message



10:36

Ⓢ LTE 74%



18037341890



↗ Outgoing call <sup>HD</sup>

Aug 21, 4:34 PM

3min 6sec



Call

Video call

Message



10:36

LTE 74%



18037341890



Outgoing call  
Aug 22, 2:00 PM

2min 50sec



Call



Video call



Message



**Sent:** Mon, Aug 19, 2024 at 2:26 PM

**Subject:** Scanned image from CCPL

Reply to: CCPL Public Copier <[do-not-reply@ccpl.org](mailto:do-not-reply@ccpl.org)>

Device Name: KSNC-MFP-ADULT-COPIER

Device Model: MX-3050V

Location: Keith Summey North Charleston Library

File Format: PDF MMR(G4)

Resolution: 300dpi x 300dpi

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STATE OF SOUTH CAROLINA

20222a1010202600

VS

MARGIE BROWN

I Margie Brown state that I am unable to retrieve any mail from my PO BOX 70813 North Charleston, SC 29415. The keys were stolen, I am asking that the Court of Appeals please send any and all notification to my email address brown.margie@aol.com.

Margie Brown  
8/19/2024