

**RECEIVED**

SEP 12 2024

S.C. SUPREME COURT

No. 23-2220

(3:22-CV-03973-MGL)

IN THE

SUPREME COURT OF THE UNITED STATES

McKinley Wright Jr. — PETITIONER  
(Your Name)

vs.

South Carolina Department of Employment and Workforce — RESPONDENT(S)  
SEFA Transportation Inc. The Supreme Court of South Carolina, The South Carolina  
Court of Appeals State of South Carolina administrative law court; Steven A. Jordan  
attorney for the South Carolina Department of Employment and Workforce  
Grant M. Wills, Attorney for SEFA Transportation Inc.

U.S. Court of Appeals For the Fourth Circuit Court  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

McKinley Wright Jr.  
(Your Name)

918 S. Midway Hwy,  
(Address)

Johnsonville, SC 29555  
(City, State, Zip Code)

843-625-9386  
(Phone Number)

## JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was July 29, 2024.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: July 19, 2024, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A \_\_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

The date on which the highest state court decided my case was October 7, 2022.  
A copy of that decision appears at Appendix \_\_\_\_\_.

A timely petition for rehearing was thereafter denied on the following date: October 7, 2022, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A \_\_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

IN THE  
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix \_\_\_\_\_ to the petition and is

- reported at United States Court of Appeals  
for Fourth Circuit; or,  
 has been designated for publication but is not yet reported; or,  
 is unpublished.

The opinion of the United States district court appears at Appendix \_\_\_\_\_ to the petition and is

- reported at U.S. District Court of SC; or,  
 has been designated for publication but is not yet reported; or,  
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix \_\_\_\_\_ to the petition and is

- reported at The Supreme Court of South Carolina; or,  
 has been designated for publication but is not yet reported; or,  
 is unpublished.

The opinion of the South Carolina Court of Appeals court appears at Appendix \_\_\_\_\_ to the petition and is

- reported at The Administrative Law Court; or,  
 has been designated for publication but is not yet reported; or,  
 is unpublished.

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

Yes  No If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form?  Yes  No

If yes, how much? \_\_\_\_\_

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

Yes  No

If yes, how much? \_\_\_\_\_

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

*I am the only one working in the house, some days I am not able to work, due to weather conditions or personal reasons.*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 3, 2024

McKinley WRIGHT JR  
(Signature)

No. 23-2220

(3:22-cv-03973-MGL)

IN THE  
SUPREME COURT OF THE UNITED STATES

McKinley Wright Jr. — PETITIONER  
(Your Name)

South Carolina Department of Employment and Workforce, SEFA  
Transportation Inc. <sup>VS.</sup> The Supreme Court of South Carolina; The South Carolina  
Court of Appeals; State of South Carolina Administrative Law Court;  
Steven A. Jordan, Attorney for the South Carolina Department of Employment  
and Workforce; Grant M. Willis **PROOF OF SERVICE** Attorney for SEFA Transpo  
Inc.

I, McKinley Wright Jr., do swear or declare that on this date,  
September 3, 2024, as required by Supreme Court Rule 29 I have  
served the enclosed MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*  
and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding  
or that party's counsel, and on every other person required to be served, by depositing  
an envelope containing the above documents in the United States mail properly addressed  
to each of them and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

U.S. Court of Appeals For the Fourth Circuit  
1100 E. Main Street, Suite 501 Richmond, Virginia  
23219

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 3, 2024

McKinley Wright Jr.  
(Signature)

## LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

## RELATED CASES

No. 23-2220  
(3:22-cv-03973-MGL)

1

September 3, 2024

United States District Court District  
of South Carolina  
Clerk's Office  
901 Richland Street  
Columbia, South Carolina 29201

The Supreme Court of South Carolina  
Patricia A. Howard, Clerk of Court  
Post Office Box 11330  
Columbia South Carolina 29211

South Carolina Court of Appeals  
Jenny Abbot Kitchings, Clerk  
Post Office Box 11629  
Columbia, South Carolina 29211

State of South Carolina Administrative  
Law Court  
Edgar A. Brown Building 1205 Pendleton St,  
Suite 224 Columbia, SC 29201

South Carolina Department of Employment  
and Workforce  
P.O. Box 8597  
Columbia South Carolina 29202

No. 23-2220  
(3:22-cv-03973-MGL)

2

September 3, 2020

South Carolina Department of  
Employment and Workforce  
P.O. Box 8597

Columbia South Carolina 29202

Attn: Attorney Steven A. Jordan Jr.

Fisher & Phillips LLP

1320 Main Street Suite 750

Columbia South Carolina 29201

Attorney Grant M. Willis

Attorney for SEFA Transportation, Inc.

SEFA Transportation Inc.

217 Cedar Rd.

Lexington, South Carolina 29073

**STATEMENT OF THE CASE**

**REASONS FOR GRANTING THE PETITION**

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1. The petitioners have shown that the proposed change is in the public interest and that the current regulations are outdated and inefficient.

2. The proposed change will reduce the burden on businesses and individuals, while maintaining the necessary regulatory framework.

3.

No. 23- 2220  
(3:22-cv-03973-MGL)

September 3, 2020

My name is McKinley Wright Jr., and the reason why I am doing a Petition for a Writ of Certiorari is, because it was unjustified the way SEFA Transportation fired me during the pandemic. And all the federal courts and local courts know the evidence that SEFA presents doesn't match the case but they're agreeing to the lie. And took all of my civil rights from me and overlooked the evidence I wrote in the letter to them. Because the supervisor for SEFA Cory Robinson called me on March 12 of 2020 and told me to go by Winyah Star Plant to pick up a load of bad wet ash to take to Oakridge landfill junkyard. And I went to Winyah Star Plant to pick it up. The trailer he told me to get was not my trailer, it was already loaded.

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September 3, 2024

And when I hooked my truck to it, and went and got on the scale to weigh it before I took it on the highway it had 99,740 in the trailer.

The trailer was overweight and I called Cory Robinson the supervisor, and told him, he needed to talk to the people at Winyah Star Plant over loading the trailer with the bad wet ash,

and wanting us to pick it up and take it to Oak Ridge landfill whenever they call us to do it. So I

went back to the pad to dump some out of the trailer to get it to the right weight. The right weight would be 79,500

or either 80,200. And I called Cory Robinson the supervisor and all he told me was to write my time down when I get back to the SEFA plant in Georgetown. So on

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3.

September 3, 20

the 13<sup>th</sup> of March 2020,  
I took the load of bad wet  
ash to OakRidge landfill  
junkyard and when I got  
there, the loader was pushing  
the bad wet ash up, and  
he told me to bring my  
truck closer to him so I  
can dump the bad wet  
ash out for him. And when  
I went to lift the bed  
to dump the bad wet ash  
out, the truck turned  
over on the right side of me.  
And I called Cory Robinson  
the supervisor and told  
him what happened. And  
he told me he was coming  
to me because none of  
SEFA Supervisors knew  
where OakRidge landfill  
was at before Cory got to  
me, Tommy from St. George  
plant came to me first and  
he looked at the truck  
and trailer and told me  
it looked like whoever loaded

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September 3, 2024

the truck put too much bad wet ash on oneside of the trailer to cause the truck to turn over. And Tommy did not know that I had told Cory about the truck being overloaded, and he already knew what caused it to turn over. And Jody Neuroth came to me next the Safety man for SEFA And he looked at it and told me that the ground was leveled where I was dumping the bad wet ash out. And Cory Robinson the supervisor came to me next, and he told me to write my report. And I wrote my report and gave it to Cory Robinson the Supervisor like he said. And on Sunday evening, Cory Robinson the Supervisor called me back and told me he needed to write another report on what happened because he

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September 3, 20  
gave Jody Neuroth the safety  
man my report. and I told  
him I had already gave  
him my report. And he wrote  
a report behind my back  
to Billy Bronson and Tiffinany  
Peak that I was unsafe  
on the job and drove  
SEFA truck unsafe. And  
they fired me all because  
of a lie. Saying that I  
did not report the overweight  
truck, to any SEFA supervisor.  
And lied to South Carolina  
Unemployment and Workforce  
saying I had a misconduct  
on the job. Denied my  
unemployment benefits and  
I was hurt on the job at  
the same time and denied  
my workers comp. And  
cancelled my medical insurance  
during the pandemic all  
because of a lie And attorney's  
Steven A. Jordan and Grant M.  
Wills know that the evidence  
doesn't match, and the judges

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do too, but are still agreeing with them. On the lie. And the Worker's Comp. attorney E. Hood Temple proved to Allison Nauwbaum and SEFA Transportation that they wrongfully terminated me. And to the South Carolina Worker's Compensation Commissioner at the hearing and it was unjustified how SEFA Transportation fired me in the midst of COVID-19. And I was fired the same day the school sent my daughter home due to COVID-19. And I was hurt on the job at the same time and the doctor was treating me while I was hurt, and they stopped me from seeing the doctor. I went to the doctor on the appointment he told me to come and see him he told me he couldn't see me because SEFA Transportation stopped it. And they denied my

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September 3, 2024

worker's comp. benefits during COVID-19. And lied to the South Carolina Unemployment and Workforce that I had a misconduct on the job. And I had 14 years on the job working for SEFA Transportation for them to have outrageous hate behavior. like that to me, and I didn't do anything wrong but did what the supervisor told me to do. And it was unjustified how South Carolina Unemployment and Workforce believed SEFA Transportation lie and I wrote them several letters telling them the truth and they denied my unemployment benefits during COVID-19 while all of them were getting paid during COVID-19, while I didn't have any money to support my family during COVID-19. That's why I was suing South Carolina

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September 3, 2024

Unemployment and Workforce  
for my benefits they  
denied me during COVID-19  
and that's why I was  
swing SEFA Transportation  
for lost wages and wrongful  
termination. And after  
SEFA Transportation fired  
me, Cory Robinson the  
supervisor for SEFA Transportatic  
called me on March 17<sup>th</sup>  
and told me that it was  
wrong how Tiffany Peak  
and Billy Bronson fired  
me and it was heartbroken  
what they did to me. And  
he was the one that wrote  
the bad report for me to  
be fired. And SEFA Transportation  
Inc. stopped all the trucks  
like I was driving from  
coming into Oak Ridge land fill  
junkyard. and started  
putting the bad wet ash  
on a belt trailer that spins the  
bad wet ash out. They know  
that the bad wet ash caused

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the truck to turn over  
but they couldn't do  
nothing to Santee Coopers  
because they own the  
Winyah Star Plant. So  
they framed me, and lied  
and said I was unsafe  
and fired me because  
I was black. And my  
attorney E. Hood Temple called  
me on a Sunday and told me  
that SEFA Transportation  
Inc. was going to lie and  
say that I was unsafe on  
the job, because they couldn't  
fire me just to fire me.  
And my attorney E. Hood Temple  
double-crossed me for SEFA  
because SEFA bribed him  
after he called and told me  
that and won't tell the truth  
to Steven A. Jordan and  
Grant M. Willis and to the  
Court

Thank You  
McKinley Wright JR

No. 23-2220

(3:22-cv-03973-MGL)

IN THE  
SUPREME COURT OF THE UNITED STATES

McKinley Wright Jr. — PETITIONER  
(Your Name)

VS.  
South Carolina Department of Employment and Workforce, SEFA  
Transportation Inc. The Supreme Court of South Carolina; The South Carolina  
Court of Appeals; State of South Carolina Administrative Law Court;  
Steven A. Jordan, Attorney for the South Carolina Department of Employment  
and Workforce; Grant M. Willis, Attorney for SEFA Transpo  
Inc. — RESPONDENT(S)

I, McKinley Wright Jr., do swear or declare that on this date,  
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commercial carrier for delivery within 3 calendar days.

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U.S. Court of Appeals for the Fourth Circuit  
1100 E. Main Street, Suite 501 Richmond, Virginia  
23219

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 3, 2024

McKinley Wright Jr.  
(Signature)

**CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

McKinley Wright Jr.

Date: 9-3-2024

McKinley Wright Jr  
918 S Midway Hwy  
Johnsonville, S.C. 29555

**Retail**  
  
RDC 99

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JOHNSONVILLE, SC 29555  
SEP 10, 2024

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29211

The Supreme Court of South Carolina  
Patricia A. Howard, Clerk of Court  
Post Office Box 11330  
Columbia, S.C. 29211

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