

South Carolina
Court of Appeals

Herbert Alonzo Robinson

Appellant,

v.

Charleston Police Dept.

(CPD),

Respondent-Appellee

Appellate case No. 2013 -
000948

Appellant's Reply
to Respondent Charles-
ton Police Dept. Motion
to Dismiss.

The Appellant above named in Direct Response to Appellee chas. Police Dept (CPD) Motion to Dismiss my Appeal would state: (Appellee-Respondent's Motion dated 7-31-13,

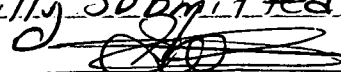
1. The Appellees are attempting to hold I, Appellant, Robinson to the same stringent standards applied to Licensed Attorneys at Law, when the Court under: Gordon v. Leeke, 574 F2d 1147 (4th Cir) states a [LESS] stringent standard is to be used.
2. It is the Appellees design to use [minute] issues to attempt to circumvent my Appeal being Decided on the [Merits], but Dismissed due to Minor Technicalities.
3. I Filed my Notice of Appeal within 10 (ten) days of Judge Nicholson Dismissing my lawsuit and provided this Honorable Court with Proof I served Counsel,

Buyck & Sanders, LLC a copy of the Notice. Appellee was served Timely or Duly. I also when submitting my Brief informed both this Honorable Appellate Court and the South Carolina Court Administration also counsel notice I could not pay the costs for the Transcript due to my Indigency. I also advised the Appellate Court I wish to proceed with my Appeal without pre-payment of fees or In Forma Pauperis.

I believed having done all of the aforementioned and timely submitted the actual lower courts written order of dismissal that I had complied with the Rules of Appellate Court.

If the Court orders me to Re-submit the written order with an AMENDED Notice of Appeal to bring my case to due form I will, to not have my Appeal Dismissed. please see Attachment.

Wherefore, I pray the Honorable Deny Respondent Appellee ~~Chas. Police Dept~~ ^{Chas. Police Dept} Motion to Dismiss. Respectfully Submitted,


Herbert Alonzo Robinson, #288364
Allendale C.F., P.O. Box 1151, Fairfax, SC 29827
Appellate pro se.

8/7/13

South Carolina
Court of Appeals

Herbert Alonzo Robinson,
Appellant
v.

C/A No. 12-CP-10-7056

* Appellate case

Number: 2013-000948

Charleston Police
Dept. (CPD),
Respondant-Appellee

Proof of Service

I, certify I, have this 7th day of
August, 2013, served a copy of my
Reply to Respondent (Appellee) Char.
Police Dept. Motion to Dismiss upon
Respondent, Char. Police Dept. (CPD)
In an Envelope deposited in the
United States Mail, properly Addressed,

To: G. Wade Cooper

Buyck & Sanders, LLC

P.O. Box 2424

Mt. Pleasant, SC 29465

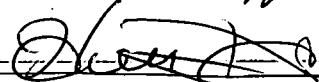
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AUG 14 2013

SC Court of Appeals

8/7/13

Attorney for Defendant Appellee



Herbert Alonzo Robinson 298364

Fairfax, SC

Allendale C.F., POB 1151, Fairfax, SC

Appellant, prose

29827

Appellate Case No. 2013-000948

Aug. 7, 2013

To: Ms. Kitchings, clerk

S.C. Court of Appeals

1015 Sumter Street

Box 11629, Columbia, SC 29211

RE: Robinson v. Chas. Police Dept.

Dear Ms. Kitchings: How are you man.
Please find enclosed my Proof of Service
and Reply to Respondent, Charleston Police
Dept. Motion to Dismiss, for Filing.

Thank you,

Herb

Herbert Alonzo Robinson
#298364 - Allendale C.I.
P.O. Box 1151, Fairfax, SC

29827

Appellant - prose

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AUG 14 2013

SC Court of Appeals