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**Dec 02 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Judge

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Trial case No. 2022-CP-04-01976  
Appellate Case No: 2023-000045

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Appellant's Initial REPLY Brief:

Addendum Of: Cross Claim case: 2019 001742

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Danny L. Ivester, Sr., Appellant,

v.

EYZC RE, LLC, Respondent.

December 2, 2024

Appellant's Initial REPLY Brief:

To: The Honorable Jenny A. Kitchings, Clerk.

Appellant, First serves: Kingdom of YHWH God & Son.

1. Appellant, All *RIGHTS* Reserved: UCC 1-308 in 1-103.6, other.  
Enters Within Admiralty: Saving to Suitor, Title 28 1333 (1).

Appellant's Cross Claim:

South Carolina Supreme Court case: 2019 001742.

**TIME**: All *RIGHTS* Reserved, **Want of form (a) 1789**.

2. Respondents are unintelligible with their facts that are NOT relevant & misleading in their Initial brief. The Magistrate court has admitted lack of jurisdiction with this matter. Therefore ALL & any of respondents brief are **NULL & VOID**. And so the order of The Honorable J. Cordell Maddox Jr., Circuit Judge, in respect & that this appeal is from. Lack of jurisdiction voids all claim or orders from onset of this matter. The relevant **fact** is: **Defraud** by SC state agents on Appellant & The S.C. & U.S. Constitutions.

See: The Honorable Sandra Day O'Conner in the case of New York v. United States, 505 U.S. 144 (1992) Summary: Constitution **does NOT** protect state sovereignty **for benefit** of states **or** government as political entities or **officials** governing the states. To the **contrary**: Constitutions divide authority **for** protection **of individuals**. Miranda v. Ariz., 384 U.S. 436 at 491 (1966). Main v. Thiboutot, 100 S. Ct. 2502 (1980), Griffith v. Frazier, [S.C.] 12 U.S. 9, 8 Cranch 9, 3 L. Ed. 471. (1814), Thompson v Tolmie, 2 Pet. 157, 7 L. Ed. 381; (1829), Reid v. Covert, 354 U.S. 1, 1 L. Ed. 2nd. 1148 (1957), Elsner v. McComber, 252 U.S. 189 at 207. (1920)

3. Appellant states, so in relevant fact that this case is now criminal by Repondents & their agents moreso than civil. So: Addendum to Appellant's Cross Claim: The agents / actors in perjury of oath within are separate suits. Consequently criminal federal charges of fraud, abuse of process with intent of felony fraud, collusion, & Conspiracy against Rights of the Appellant in violation of Title 18 USC sec 241. Also felony under color of law, deprivation of RIGHTS, insurrection & rebellion against the Constitution of U.S. crimes of domestic terrorism & defrauding state acts / statutes in violation of Title 18 USC sec 242.

4. Conclusion: Evidence of Relevant facts by Appellant to this court have shown in all EYZC Respondents & their judicial agents have NO CLAIM over Appellant's Standing TITLE as lawful owner, by & in Common Law. Fault lies with State of SC & Anderson County agents @ legalism & constructive fraud upon humanity or other.

“ The Constitution is a written instrument. As such its meaning does not alter. That which it meant when adopted, it means now.”

South Carolina v. United States, 199 U.S. 437, 448 (1905).

Appellant: Demands Common Law & procedural due process of Constitutional LAW 5<sup>th</sup> Amend-, denied by unlawful Takings and Before any hearing or compensation offer, YET REQUIRED. end.

## Jurisdiction

U.S. & S.C. Constitutions; Explicitly: Preamble & Bill of RIGHTS.

**In: Common Law;** Within Admiralty, Savings to Suitor, & Rem.

Title 28 U.S.C. 1333 (1) or 1337, 1331, 1332. USC Title 42, 1982 – 83 – 85 – 86 – 88. **South Carolina 15-67-100, Jury.**

Want of Form: (a) " Judiciary Act of September 24, 1789.

Title 18 USC, 241, 242.

Foreign Sovereign Immunity act.

Uniform Commercial Code: 1-308, 1-103.6. 3rd: Sovereign: Hooven

Supra 1945. 28 USC 2284 (b), (2), (3). 28 U.S.C 1343. Title 18, Part

1, Chapter 63, § 1341: Frauds and swindles, UCC 2-201 stands

**Citing:** Timbs v Indiana: 586 U.S. 17-1091 (2019). And: Tyler v Hennepin Co. Minn:

598 U.S. 22-166 (2023) & all citings therein. Appellant under duress due to lack of

equal protection & procedural due process by heighten pleadings, while Plaintiff has

prove **nothing in fact** of claim or affidavits (?). So applies: Malum in se, by: Bill of

pain & penalty upon the Appellant. U.S. Const- Art I, Sec 9 (3), States Art I, Sec 10.

Explicitly: To all in claim or judgment: Penalty of perjury applies.

Appellant: **first serves:** The Sovereign Kingdom of YHWH God & Son.

Christian appellation Danny L. Ivester, Sr. is: The only true owner of

The property c/o 211 Hwy 17, Piedmont, S.C. of Un-Inalienable Rights.

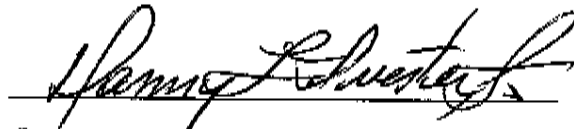
The Secured party and ONLY: Party of **interest** and **Holder** in due

course, UCC 1-308. Pertains to all: Psalms 37, Jn 8:32, Jude 1:9.

All rights reserved.

UCC 1-308, 1-103.6.

Date: Dec 2, 2024



[In Propria Persona, Sui juris:  
All at God's grace & guide

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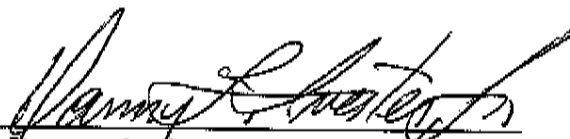
CERTIFICATE OF SERVICE

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Appellant in good faith & **truth**, maintains that he has served Initial REPLY Brief upon Respondents Initial Brief - other, dated Oct 3, 2024. Appellant also has sent pre paid By US Postal, copies to The Honorable Jenny Abbott Kitchings, Clerk, South Carolina Appeals Court, and electronic by fax to Respondents & The Court.

Date: December 2, 2024

[In Propria Persona, Sui juris:  
All at God's grace & guide



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SC Court of Appeals

# Fax

S.C. Court of Appeals

D.L. Vesting Jr.

To: 803-734-1839

From: N/A

Fax: 6

Fax: 864-437-9099

Pages:

Phone:

Dec 2, 2024

Date:

Initial Reply

Subject: