

In this 13<sup>th</sup> year of the 2<sup>nd</sup> millennium, ~25<sup>th</sup> day of the 9<sup>th</sup> Lunar Cycle(September) aka 09/25/2013.

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

CASE NO.: 2012-CP-23-6148/6149  
Appellate Case No.: 2013-001488

RECEIVED

SEP 30 2013

SC Court of Appeals

SUNTRUST BANK,

Respondent,

Vs.

BILAL ABDULLAH AND LATOYA ABDULLAH.

Appellate(s)

RESPONSE TO RESPONDENTS' MOTION TO DISMISS

**For the Record, On the Record, and Let the Record show that We are, *Al-Bilal Nasid Abdullah and LaToya Abdullah* in Propria Persona; *Always Appearing Specially*: being that **Petitioner Reserves ALL Rights, WITHOUT PREJUDICE**;(see U.C.C. 1-308, 1-103 and 1-203 codified in §§36-1-207, 36-1-103 and 36-1-203, S.C Code Ann. 2012) and states that I retain all of my rights and *Liberties* at all times and in all places: **nunc pro tunc**(now for then) from the time of my birth and forevermore. Also, I retain my rights not to be compelled to perform under any contract or commercial agreement that I did not enter knowingly, voluntarily and intentionally. And furthermore, I do not accept the liability of the compelled benefit of any unrevealed contract or commercial agreement. I am not ever subject to silent contracts and have never knowingly or willingly contracted away my sovereignty. ***It is presumed that all crimes are commercial by contract only as per 27 CFR §72.11.*****

*"The trial judge should inform a pro se litigant of the proper procedure for the action he or she is obviously attempting to accomplish."* Breck v. Ulmer, 745 P.2d 66, 75 (Alaska 1987).

***All requests by the Court have been met within the rules.***

In construing a statute, its words must be given their plain and ordinary meaning without resorting to subtle or forced construction to limit or expand the statute's operation. Adkins v. Comcar Industries, Inc., 323 S.C. 409, 475 S.E. 2d 762 (1996).

The burden falls with the Appellants to acquire a transcript and the Appellants move the Court to proceed without the transcript.

The Respondent's excessive requests for extensions to file the reply brief shows further attempt to commit fraud on the court for this frivolous motion and unnecessary delay, pursuant to SCRAP RULE 269. These acts are an attempt to stultify the court and present barratry. Any further attempts by the Respondents are to be presumed **VIOLATIONS of Due Process, Rules of the Court(s) and Substantive Rights secured by the United States Constitution and South Carolina Constitution**; therefore, We submit this Response, being an enjoyment and exercise of Our unconditional and Constitutionally - Secured Rights to timely and speedily enforce **Due Process of Law**.

"Propria, pleadings are not to be held to the same high standards of perfection as practicing lawyers. See Haines v. Kerner 92 Sct 594, also See Power 914 F2d 1459 (11<sup>th</sup> Cir1990), also See Hulsey v. Ownes 63 F3d 354 (5th Cir 1995). also See In Re: HALL v. BELLMON 935 F.2d 1106 (10th Cir. 1991)."

**United States Constitution (Bill of Rights) Amendment VII**

In suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise reexamined in any court of the United States, than according to the rules of the common law.

Legal maxim: "*Unjust is State power where the law is either uncertain or unknown.*"

Legal maxim: "*Equality is equity.*"

Petitioner Reserves ALL Inalienable RIGHTS afforded under the **Bill of Rights**, the **Universal Declaration of Human Rights**, the **Organic Constitution for the United States of America** and the **Organic Constitution for the State of South Carolina** without Prejudice.

I declare UNDER PENALTY OF PERJURY within the laws of the UNITED STATES CODES that the information herein is true and correct to the best of my own personal knowledge and honorable intent; and presented as Evidence 'for the record'. I furthermore state that I am reserving my right to 'Present' own 'Proper Self' by Sovereign Right, and Affirmed to the best of my knowledge and belief. ***So Help Me God Allah(SWT)!***

WHEREFORE Petitioner *moves and demands the Court to ENTER AN ORDER* declaring that **All UNCONSTITUTIONAL** (misrepresented) Bills of Exchange: CITATION issued under Color of Authority, to be '**Dismissed**', '**Abated**' and **expunged from the Record, with prejudice**; being null on its face and merits based upon the **forementioned grounds and Authorities** presented to the Court as well as herein; and also *moves this Honorable Court to enter an Order adjudging the Respondent(s) liable for the suffered damages to Accused redressing money damages of Thirty Thousand U.S. Dollars* in lawful money to Redress the grievances from the presumed Violations of DUE PROCESS, Violations of the Rules of Court and the

UNCONSTITUTIONAL Restraint of my Liberty, together with such other and further relief as the Court may deem reasonable and just under the circumstances. Legal maxim: "Courts are for the people to command the power of the State." Since Petitioner **do not waive any rights; Petitioner do not transfer power of attorney; and Petitioner do not willingly consent to any 'quasi-judicial' public trial or hearing in any 'colorable' tribunal/venue or non-Article III, unconstitutional jurisdiction.**

A response is required within ten(10) days upon receipt of this Petition. If no response is received, the Petitioner will presume the UTC #1978-LCQ dismissed with prejudice.

*Notice to Agent is Notice to Principal. Notice to Principal is Notice to Agent.*

**CERTIFICATE OF SERVICE**

UNDER PENALTY OF PERJURY within the law of the UNITED STATES CODES, I HEREBY CERTIFY that a true and correct copy will be furnished by U.S. mail delivery to: **South Carolina Supreme Court Clerk**, Post Office Box 11330, Columbia, South, Carolina 29211; **Paul B. Wickensimer, Greenville County Clerk of the Court**, Courthouse, 305 E North Street, Greenville, SC 29601; **Sheila M. Bias- Richardson Plowden & Robinson, P.A.**, P.O Drawer 7788, Columbia, SC 29202; **State of South Carolina Attorney General, The Honorable Alan Wilson**, Rembert Dennis Building, 1000 Assembly Street Room 519, Columbia, South Carolina 29211; **the United States Department of Justice - United States Attorney General**, 950 Pennsylvania Ave., N.W., Washington, D. C. 20530-0001; and **South Carolina Secretary of State**, 1205 Pendleton Street, Suite 525, Columbia, South Carolina 29201

I Am: Bilal Abdullah

**Bilal Abdullah**, Ex Relatione BILAL ABDULLAH  
Non-Assumpsit – All Rights Reserved, Without Prejudice:  
c/o 7 Landing Lane  
Simpsonville non-domestic near (29681)-9999  
South Carolina united States of America

**IN THE NAME OF THE ALMIGHTY!!!**

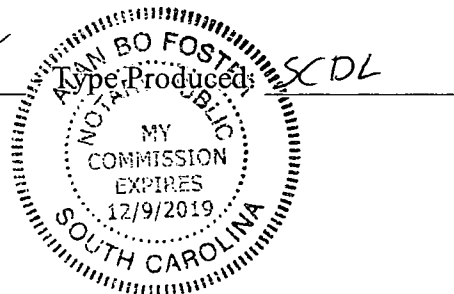
**NOTARY PUBLIC**

In the State of **South Carolina**, County of **Greenville**

BEFORE ME personally appeared Al-Bilal Nashid Abdullah, affirmed and subscribed in my presence this 25 day of September, 2013.

[Signature]  
Notary Public

Personally Known \_\_\_\_\_ OR Produced Identification



In this 13<sup>th</sup> year of the 2<sup>nd</sup> millennium, ~25<sup>th</sup> day of the 9<sup>th</sup> Lunar Cycle(September) aka 09/25/2013.

**The Supreme Court of South Carolina**

Suntrust Bank, Respondent,

v.

Bilal Abdullah and Latoya Abdullah, Appellants,

Of Whom Bilal Abdullah is Petitioner

Appellate Case No.: 2013-001488

Lower Court Case Nos.: 2012-CP-23-6148 and 2012-CP-23-6149

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SEP 30 2013  
**SC Court of Appeals**

**VERIFIED LEGAL NOTICE(Affidavit)**

**Request for Clarification**

\*Certify a Question of Great Public Importance.  
For The Record, To Be Read Into The Record:

*\*Cannon v. Commission on Judicial Qualifications, (1975) 14 Cal. 3d 678, 694*

*Acts in excess of judicial authority constitutes misconduct, particularly where a judge deliberately disregards the requirements of fairness and due process. (also see Excess of Jurisdiction Rule pursuant to Black's Law Dictionary 9<sup>th</sup> Edition)*

*"If any question of fact or liability be conclusively presumed against him, this is not due process of law, Zeigler v. Railroad Co., 58 Ala. 599."*

In response to your misrepresented assumption that my Affidavit(s) was "frivolous", let the record show, it was an exercise of RIGHT: therefore, the nature of the filing is of great importance do to the court and its assigns **VIOLATIONS of Due Process, Rules of the Court(s) and Substantive Rights secured by the United States Constitution and South Carolina Constitution** as detailed below. The COURT and its ASSIGNS are presumed to have performed acts that Threatens the Liberty and Pursuit of Happiness of the accused Natural Person. *Attempts at calling presentments "frivolous" without specifically rebutting the particular claim, or claims, deemed "frivolous" will be indeed itself "frivolous" and prima facie evidence that shall be used accordingly; since the assertion of our Rights to Life, Liberty and Pursuit of Happiness being abridged is NOT a matter to be stultified.*

**FACTUAL ALLEGATIONS**

1. A Motion to Compel Discovery was filed with the court; and
2. Several Legal Notices were filed with the court that was never addressed as if being IGNORED. *See Exhibit A and Exhibit B.*
3. A "Judicial Notice" and "Financial Statement" was presented on June 12, 2013; which the 'Judicial Notice' does not appear to be filed when checking status Online. *Exhibit C*
4. I have continued to get delays from the filing clerks when filing my documents that prejudice my defense to the case further abrogating our Liberty to access the courts;
5. Having to return several days after attempting to file my docs the filing clerks continue to delay the process when I was well within the rules. *See 18 U.S.C. §241 and §242.*

6. My Judicial Notice was never responded to by the lower court, by “*receipt of written notice of entry of the more complete order or judgment*”, is presumed violations of Due Process. See SCRCF Rule 203(b) (1)

In an effort to settle this matter in the most efficient manner possible, I can accept your offer/order upon providing proof of claim(written opinion) of all the following conditions:

1. That rules of the court was not violated?
2. That the filing clerks tactics are not **tampering with Evidence and Obstruction of justice** upon my case, pursuant to **SECTION 30-1-140**?
3. The court failure to address my Judicial Notice was not a violation pursuant to SCRCF Rule 52(b)?
4. That the acts by the court by not acknowledging general material issues presented to the court on record and verbally in court, did not further prejudice the case and exhaust time for us to receive proper Due Process?
5. That the court did not ignore the rules of discovery that was lawfully issued?
6. That the court did not act impartial further causing harm to my case pursuant to **42 U.S.C. §1985 and 42 U.S.C. §1986**?

**Legal maxim: “Unjust is State power where the law is either uncertain or unknown.”**

The constitutional requirement of due process and the safeguarding of the liberty of the citizen against deprivation through the action of a state embodies the fundamental conceptions of justice which lie at the base of the civil and political institutions in the United States. *Mooney v. Holohan*, 294 U.S. 103, 55 S.Ct. 340, 79 L.Ed. 791 (1935).

That actionable cause is the treatment of a non-lawyer pro se litigant as a distinct "class-based subject" of the Court, wherein denial of equal protection of the laws and denial of due process was clearly the product of bias and prejudice of the Court. See *Griffen v. Breckenridge*, 403 U.S. 88, 102 (1971).

The U.S. Supreme Court in *Griffen* emphasized 1985(3) legislative history was directed to the prevention of deprivations which shall attack the equality of rights of American citizens; that any violation of the right, the animus and effect of which is to strike down the citizen, to the end that he may not enjoy equality of rights as contrasted with his and other citizens' rights, shall be within the scope of remedies... Id. at 100.

Judicial Notice is discretionary. With Judicial Cognizance, the judge is BOUND to act: See Black's Law, 6th Ed, pg 847

Petitioner Reserves ALL Inalienable RIGHTS afforded under the **Bill of Rights**, the **Universal Declaration of Human Rights**, the **Organic Constitution for the United States of America** and the **Organic Constitution for the State of South Carolina** without Prejudice. See *UCC 1-308*.

**S.C. Const.(2012) Art. 1 SECTION 1** “*Political power in people.— All political power is vested in and derived from the people only, therefore, they have the right at all times to modify their form of government..*”

*Where rights secured by the Constitution are involved, there can be no rule-making or legislation, which would abrogate them. Miranda v. Arizona 384 US 436, 125.*

I declare UNDER PENALTY OF PERJURY within the laws of the UNITED STATES CODES that the information herein is true and correct to the best of my own personal knowledge and honorable intent; and presented as Evidence 'for the record'. I furthermore state that I am reserving my right to 'Present' own 'Proper Self' by Sovereign Right, and Affirmed to the best of my knowledge and belief. *So Help Me God Allah(SWT)!*

*Notice to Agent is Notice to Principal. Notice to Principal is Notice to Agent.*

**CERTIFICATE OF SERVICE**

UNDER PENALTY OF PERJURY within the law of the UNITED STATES CODES, I HEREBY CERTIFY that a true and correct copy will be furnished by U.S. mail delivery to: **South Carolina Supreme Court Clerk**, Post Office Box 11330, Columbia, South, Carolina 29211; **Paul B. Wickensimer, Greenville County Clerk of the Court**, Courthouse, 305 E North Street, Greenville, SC 29601; **Sheila M. Bias-Richardson Plowden & Robinson, P.A.**, P.O Drawer 7788, Columbia, SC 29202; **State of South Carolina Attorney General, The Honorable Alan Wilson**, Rembert Dennis Building, 1000 Assembly Street Room 519, Columbia, South Carolina 29211; **the United States Department of Justice - United States Attorney General**, 950 Pennsylvania Ave., N.W., Washington, D. C. 20530-0001; and **South Carolina Secretary of State**, 1205 Pendleton Street, Suite 525, Columbia, South Carolina 29201

I Am: *Bilal Abdullah*

**Bilal Abdullah**, Ex Relatione BILAL ABDULLAH  
Non-Assumpsit – All Rights Reserved, Without Prejudice:  
c/o 7 Landing Lane  
Simpsonville non-domestic near (29681)-9999  
South Carolina united States of America

**IN THE NAME OF THE ALMIGHTY!!!**

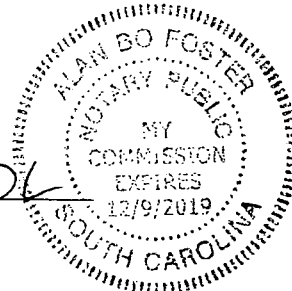
**NOTARY PUBLIC**

In the State of **South Carolina**, County of **Greenville**

BEFORE ME personally appeared Al-Bilal Nashid Abdullah, affirmed and subscribed in my presence this 25 day of Sept, 2013.

*[Signature]*  
Notary Public

Personally Known \_\_\_\_\_ OR Produced Identification ✓ - Type Produced: SC DL



# EXHIBIT A

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS  
CASE NO.: 2012-CP-23-6148/6149

SUNTRUST BANK,

Plaintiff,

Vs.

BILAL ABDULLAH AND LATOYA ABDULLAH.

Defendant

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SC Court of Appeals

**LEGAL NOTICE**

A "Judicial Notice" and "Financial Statement" was submitted on June 12<sup>th</sup>, 2013. The financial statement was filed in the system on June 18<sup>th</sup> but the 'Judicial Notice' does not appear to be filed when checking status Online. **Clearly an attempt to not take 'Judicial Notice' is an attempt to deny Due Process of Law and possibly Obstruct Justice. Pursuant to South Carolina Rules of Evidence 201(d), the court shall take Judicial Notice:** NOT for the Courts to tamper and misrepresent it, being that Tampering with Evidence is a Federal Violation, and a clear corruption of the fiduciary duties of all Court Officers/Public Servants. Furthermore, *the Courts* refusal to process the 'Judicial Notice' is an attempt to a violation of My Constitutional secured RIGHTS of Due Process.

**This is not only a violation of the United States Constitution;** it is also a violation of the **South Carolina Constitution. As Officer(s) of the Court**, you and your assigns are bound, and have taken a solemn Oath(s) to uphold and Support the Constitution for the United States Republic and the South Carolina Constitution (See Article VI of the US Const. and SC Const.). Refusal to take 'Judicial Notice' is construed to deny me 'Due Process' and is a 'Colorable Act'. This act constitutes "Perjury of Oath." These violations result in additional lawful remedies or actions filed against those violating Officers of the Court, Under United States Code Of Law, Title 18 and Title 42. Offenders may be sued in their Official and private capacities. The Law always gives a remedy.

**WHEREFORE**, Defendant moves the Court to take Judicial Notice of all precedents presented herein and enter an Order to Vacate Summary Judgment declaring the subject transaction rescinded and all such other relief as Defendant may prove entitled. I enter this 'Judicial Notice' as Evidence, and demand that it be taken without tampering by any unauthorized persons, SO HELP ME GOD.

**\*\*\*I expect to see the Judicial Notice on the docket within five (5) days to show acknowledgment that judicial notice has been taken, or it will be presumed tampering with Evidence. If not posted redress will be sought.**

I declare under penalty of perjury under the law of the UNITED STATES CODES that the above is true and correct to the best of my own personal knowledge and honorable intent. **SO HELP ME GOD!!!**

**Notice to the Agent is Notice to the Principal – Notice to the Principal is notice to the Agent.**

**CERTIFICATE OF SERVICE**

UNDER PENALTY OF PERJURY under the law of the UNITED STATES CODES, I HEREBY CERTIFY that a true and correct copy will be furnished by U.S. mail delivery to: **South Carolina Supreme Court Clerk - Daniel E. Shearouse**, Supreme Court of South Carolina, P.O. Box 11330, Columbia, SC 29211; **Paul B. Wickensimer, Greenville County Clerk of the Court**, Courthouse, 305 E North Street, Greenville, SC 29601; **S. Nelson Weston, Jr. - Richardson Plowden & Robinson, P.A.**, P.O Drawer 7788, Columbia, SC 29202; **State of South Carolina Attorney General, The Honorable Alan Wilson**, Rembert Dennis Building, 1000 Assembly Street Room 519, Columbia, South Carolina 29211; **ACLU of South Carolina - Executive Director: Victoria Middleton**, P.O. Box 20998, Charleston, SC 29413-0998.

I am: Bilal Abdullah

Bilal Abdullah:

**In Special Appearance under Threat, Duress and Coercion**

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C/ 7 Landing Lane

Simpsonville Non-Domestic near (29681)-9999

South Carolina united States of America

***IN THE NAME OF THE ALMIGHTY!!!***

**NOTARY PUBLIC**

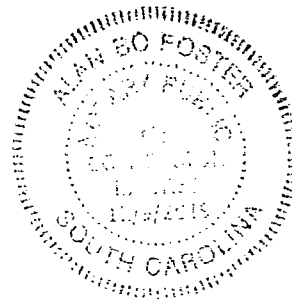
In the State of **South Carolina**, County of **Greenville**

BEFORE ME personally appeared Bilal Abdullah, affirmed and subscribed in my presence this

24<sup>th</sup> day of June, 2013.

[Signature]  
Notary Public

Personally Known \_\_\_\_\_ OR Produced Identification  - Type Produced: SCDL



# EXHIBIT B

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS  
CASE NO.: 2012-CP-23-6148/6149

SUNTRUST BANK,

Plaintiff,

Vs.

BILAL ABDULLAH AND LATOYA ABDULLAH,

Defendant

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SEP 30 2013

**SC Court of Appeals**

**VERIFIED LEGAL NOTICE**

Pursuant to SCRCP Rule 203(b) (1), *“When a timely motion for judgment n.o.v. (Rule 50, SCRCP), motion to alter or amend the judgment (Rules 52 and 59, SCRCP), or a motion for a new trial (Rule 59, SCRCP) has been made, the time for appeal for all parties shall be stayed and shall run from receipt of written notice of entry of the order granting or denying such motion. When a form or other short order or judgment indicates that a more full and complete order or judgment is to follow, a party need not appeal until receipt of written notice of entry of the more complete order or judgment.”*

Apparently, I am still waiting on a response to my Motion for Judicial Notice, see Rule 52(b) presented to the lower court; where I was coerced to file my notice of appeal as if the time was approaching expiration. Their pass response or actions appeared as if they were not going to answer. In support, being that the filing clerk manager, Sandra Mansel, mention to me verbally on several occasions that she was not going to file my document as I was well within the rules of the court. These actions of hers were displayed upon me since the opening of the case. After I had already filed the Notice of Appeal, she later called indicating she had to deliver the Judicial Notice to the Judge and she had made a mistake. She stated to me the Judge is not going to answer because of the Notice of Appeal; however according to the rules, the court shall answer the Judicial Notice. These acts further prejudice the case and exhaust time for us to receive proper Due Process. Their response or actions shall prevent the appeal if the lower court response is adherent to the rules.

**The Judicial Notice has still not been posted on the docket. This act will be presumed as tampering with Evidence and Obstruction of justice.**

**WHEREFORE**, Defendant moves the Court to take Judicial Notice of all precedents presented herein and enter an Order to Vacate Summary Judgment declaring the subject transaction rescinded and all such other relief as Defendant may prove entitled. A response from the appellate court shall not be necessary upon a response from the lower court within ten (10) days upon receipt. I demand that it be taken without tampering by any unauthorized persons, SO HELP ME GOD.

**Notice to the Agent is Notice to the Principal – Notice to the Principal is notice to the Agent**

I declare UNDER PENALTY OF PERJURY under the laws of the UNITED STATES CODES that the above is true and correct to the best of my own personal knowledge and honorable intent. **SO HELP ME GOD!!!**

**CERTIFICATE OF SERVICE**

UNDER PENALTY OF PERJURY under the law of the UNITED STATES CODES, I HEREBY CERTIFY that a true and correct copy will be furnished by U.S. mail delivery to: **Jenny Abbott Kitchings, Clerk of Court, P.O. Box 11629, Columbia, South Carolina 29211; Paul B. Wickensimer, Greenville County Clerk of the Court, Courthouse, 305 E North Street, Greenville, SC 29601; S. Nelson Weston, Jr. - Richardson Plowden & Robinson, P.A., P.O. Drawer 7788, Columbia, SC 29202; State of South Carolina Attorney General, The Honorable Alan Wilson, Rembert Dennis Building, 1000 Assembly Street Room 519, Columbia, South Carolina 29211; ACLU of South Carolina - Executive Director: Victoria Middleton, P.O. Box 20998, Charleston, SC 29413-0998.**

I am: *Bilal Abdullah*

**Al-Bilal Nashid Abdullah, Authorized Representative**  
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c/o 7 Landing Lane  
Simpsonville non-domestic near (29681)-9999  
South Carolina united States of America

***IN THE NAME OF THE ALMIGHTY!!!***

# EXHIBIT C

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS  
CASE NO.: 2012-CP-23-6148/6149

SUNTRUST BANK,

Plaintiff,

Vs.

BILAL ABDULLAH AND LATOYA ABDULLAH.

Defendant(s)

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SEP 30 2013

SC Court of Appeals

**VERIFIED MOVE FOR JUDICIAL NOTICE**

\*Second Petition for Writ of Error-Demand to Vacate Summary Judgment

***Move for the Court to take Judicial Notice: See South Carolina Rules of Evidence Rule 201: (d) When Mandatory. A court shall take judicial notice if requested by a party and supplied with the necessary information.***

*Bilal Nashid Abdullah and LaToya Abdullah; Appearing Specially*, hereby moves this Court to take Judicial Notice of the following:

1. "Even when there is no dispute as to evidentiary facts, but only as to the conclusions to be drawn from them, summary judgment should be denied." Redwend Limited Partnership v. Edwards, 354 S.C. 459, 581 S.E.2d 496 (Ct. App. 2003).
2. "In cases in which the burden of proof is the preponderance of the evidence, "the non-moving party is only required to submit a mere scintilla of evidence to withstand a motion for summary judgment." Hancock v Mid-South Management Co., Inc., 381 S.C. 326, 331 673 S.E.2d 326, 327 (2009). The scintilla of evidence standard is met "if there is any evidence at all in a case ... tending to support a material issue ...." Henry C. Black; Black's Law Dictionary 1207 (5th ed. 1979) (emphasis added).
3. "Moreover, summary judgment is not appropriate where further inquiry into the facts of the case is desirable to clarify the application of the law." Middleborough Horizontal Property Regime Council of Co-owners v. Montedison, S.p.A., 320 S.C. 470, 465 S.E.2d 765 (Ct. App. 1995).
4. "In determining whether a genuine issue of fact exists, the evidence and all reasonable inferences drawn from it must be viewed in the light most favorable to the nonmoving party" Sauner v. Pub. Serv. Auth. of S.C., 354 S.C. 397, 404, 581 S.E.2d 161, 165 (2003).
5. "Summary judgment is a drastic remedy." Cunningham v. Helping Hands, Inc., 352 S.C. 485, 575 S.E.2d 549 (2003). "Summary judgment should be cautiously invoked so that a litigant is not improperly deprived of a trial on disputed factual issues." 352 S.C. at 391, 575 S.E.2d at 552.
6. "(noting that when ruling on motion for summary judgment, trial judge must consider all of the documents and evidence within the record, including pleadings, depositions, answers to interrogatories, admissions on file, and affidavits). All ambiguities, conclusions, and inferences arising from the evidence must be construed most strongly against the moving party." Schmidt v. Courtney, 357 S.C. 310, 592 S.E.2d 326 (Ct. App. 2003); Bayle v. South Carolina Dep't of Transp., 344 S.C. 115, 542 S.E.2d 736 (Ct. App.

2001); see also Ferguson v. Charleston Lincoln Mercury, Inc., 349 S.C. 558, 563, 564 S.E.2d 94, 96 (2002)

**WHEREFORE**, Defendant moves the Court to take Judicial Notice of all precedents presented herein and enter an Order to Vacate Summary Judgment declaring the subject transaction rescinded with the result that Plaintiff's claim is void and unenforceable and all such other relief as Defendant may prove entitled. I enter this 'Judicial Notice' as Evidence, and demand that it be processed without tampering by any unauthorized persons, **SO HELP ME GOD.**

I declare under penalty of perjury under the laws of the UNITED STATES CODES that the above is true and correct to the best of my own personal knowledge and honorable intent. **SO HELP ME GOD!!!**

**RESPECTFULLY SUBMITTED.**

**CERTIFICATE OF SERVICE**

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Sincerely,

I Am: Bilal Abdullah

**Bilal Abdullah**

In Special Appearance under Threat, Duress and Coercion  
Non-Assumpsit – All Rights Reserved, Without Prejudice:

***IN THE NAME OF THE ALMIGHTY!!!***

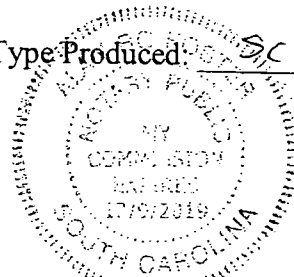
**NOTARY PUBLIC**

In the State of **South Carolina**, County of **Greenville**

BEFORE ME personally appeared Bilal Abdullah, affirmed and subscribed in my presence this 12th day of June, 2013.

[Signature]  
Notary Public

Personally Known \_\_\_\_\_ OR Produced Identification ✓ - Type Produced SCDL



Bill Abdullah  
7 Landing Lane  
Simpsonville, South Carolina 29681

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE  
**CERTIFIED MAIL™**



7013 1710 0000 6712 2257

**RECEIVED**

SEP 30 2013

**SC Court of Appeals**

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