

RECEIVED

JUN 23 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

CIA No. 25-000215

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenksi

Case No. 25-ALJ-04-0022-AP

SOUTH CAROLINA DEPARTMENT
OF CORRECTIONS

Respondent

v.

Abam D. Brawley

Appellant

MOTION FOR PRELIMINARY INJUNCTION
S.C. Civil Rule 65 / Summary Judgment S.C. Civil Rule 56

Pro Se
Mr. Abam D. Brawley
Wateree Cor. Inst.
P.O. Box 189
142 Statefarm Rd.
Rembert S.C. 29128-0189

TABLE OF CONTENTS

S.C. Court of Appeals
Forum Process order

Table of AUTHORITIES

ii

AVERTMENT OF ISSUES ON APPEAL

page 1

AVERTMENT of the CASE

page 3

Standard of Review

page 5

Imbratio I

page 7

Imbratio II
ADDENDUM
Liability

page 11

CONCLUSION

page 12

Proof of Service

page 13

APPENDIX Affidavit (A) (B)

page 14a

1-23

1-9

The South Carolina Court of Appeals

Abram Braveboy, #284787, Appellant,

v.

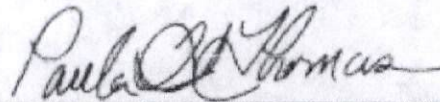
South Carolina Department of Corrections, Respondent.

Appellate Case No. 2025-000715

ORDER

Appellant filed a notice of appeal challenging an order issued by the administrative law court (ALC) concerning whether the South Carolina Department of Corrections (SCDC) improperly denied Appellant access to the courts by refusing to mail documents to the courts. The ALC dismissed Appellant's appeal.

Thereafter, Appellant filed a motion to proceed *in forma pauperis*, in which he alleged SCDC violated his constitutional right to access to the courts. No return was filed. After careful consideration, we grant the motion. *See Ex parte Martin*, 321 S.C. 533, 535, 471 S.E.2d 134, 134-35 (1995) ("Motions to proceed *in forma pauperis* may be granted only when authorized by statute or required by constitutional provisions.").



FOR THE COURT

Columbia, South Carolina

cc:

Abram Braveboy, 284787

Christina Catoe Bigelow, Esquire

FILED
May 28 2025

The South Carolina Court of Appeals

Abram Braveboy, #284787, Appellant,

v.

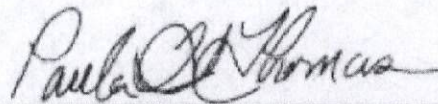
South Carolina Department of Corrections, Respondent.

Appellate Case No. 2025-000715

ORDER

Appellant filed a notice of appeal challenging an order issued by the administrative law court (ALC) concerning whether the South Carolina Department of Corrections (SCDC) improperly denied Appellant access to the courts by refusing to mail documents to the courts. The ALC dismissed Appellant's appeal.

Thereafter, Appellant filed a motion to proceed *in forma pauperis*, in which he alleged SCDC violated his constitutional right to access to the courts. No return was filed. After careful consideration, we grant the motion. *See Ex parte Martin*, 321 S.C. 533, 535, 471 S.E.2d 134, 134-35 (1995) ("Motions to proceed *in forma pauperis* may be granted only when authorized by statute or required by constitutional provisions.").



FOR THE COURT

Columbia, South Carolina

cc:

Abram Braveboy, 284787

Christina Catoe Bigelow, Esquire

FILED
May 28 2025

TABLE OF AUTHORITIES

Case Cites

<u>Allen v. SCDC Supreme Court SC.</u>	S.E.2d 621, 439 S.C. 164 April 5, 2023	<u>Record</u>
<u>Anderson v. Liberty Lobby Inc</u>	106 S.Ct 2505 (1986)	<u>Writ Request</u>
<u>Al-Shabazz v. SCDC</u>	527 S.E.2d 742, 338 S.C. 354 February 14, 2000	25-03841445
<u>Beal v. Hardy</u>	769 F.2d 203 (4th Cir. 1985)	<u>S.C. Appellate</u>
<u>Beyah v. Coughlin</u>	W.R.A. 2nd Circuit F.2d 986, 289 (1986)	<u>Rules</u>
<u>Bounds v. Smith</u>	97 S.Ct. 1491 430 U.S. 817, 52 L.Ed. 272, April 27, 1977	201, 208
<u>Celotex Corp v. Catrett</u>	106 S.Ct 2548 (1986)	<u>J.C. Administrative</u>
<u>Corpton v. SCDC</u>	704 S.E.2d 639, 392 S.C. 361 May 2, 2011	<u>Law Court Special</u>
<u>Deans v. CSX Trans</u>	152 F.3d 326 (4th Cir. 1998)	<u>Appeals</u>
<u>Ex parte Martin</u>	321 S.C. 533, 535, 41 S.E. 2d, 134, 134-35 (1945)	<u>Rule 60, 63</u>
<u>Hancock v. MJO South Mgmt Co.</u>	381 S.C. 326, 673 S.E. 2d 801 (S.C. 2009)	<u>SCDC policy</u>
<u>Harrell v. Russell</u>	236 F.Supp.2d 526 (M.D. NC 2002)	<u>GA 01.03</u>
<u>Jennings-Dill Inc v. Israel</u>	SCCA 442 S.C. 48, 847 S.E. 2d 201 January 26, 2024	
<u>Lane v. New York Life Insurance Company</u>	S.C. S.Ct. 145 S.E. 146, 147 S.C. 333 October 19, 1928	
<u>Lebanon v. Blue Cross + Blue Shield</u>	349 S.C. 356, 563 S.E.2d (2002)	
<u>Lord v. Dard J Enterprises Inc.</u>	407 S.C. 544, 757 S.E.2d 695 (S.C. 2014)	
<u>Mudren et al Bryant v. Babcock chr. Inc</u>	321 S.C. 123, 638 S.E.2d 650 (2006)	
<u>Mason v. New York</u>	501 U.S. 446, 111 S.Ct. 2444 (1991)	
<u>J.C. Control Conservation League v. S.C. Dept of Health + Environmental Control</u>	669 S.E. 2d 848 2008	
<u>Sea Board Airline Ry v. Atlantic Coast Line R.Co</u>	38 S.C. 472 71 S.E. 59 April 1911	669 S.E. 2d 848 2008 669 S.E. 2d 848 2008 (S.C. App 2018)

S.C. CONSTITUTION

Article 1 § 2 S.C. Constitution
 Article 1 § 3 S.C. Constitution
 Article 1 § 15 S.C. Constitution

U.S. CONSTITUTION

1st Amendment
 8th Amendment
 14th Amendment

S.C. Statutes

§ 1-11-460
 § 1-23-660
 § 8-1-80
 § 14-1-50
 § 15-78-20(b)
 § 16-9-60
 § 16-4-340(2)(B)
 Rule 86(c)
 § 16-17-460
 Rule 65
 § 34-3-65

FEDERAL CONGRESSIONAL LAW

18 USC § 371
 18 USC § 1201, 1702
 18 USC § 3271
 28 USC § 1746
 28 USC § 2254

AVERMENT of ISSUES ON APPEAL

The Appellant victim mount usual language in the names preambles. In a Step 1 Grievance that was present Day in favor of The Rule 65 Preliminary Injunction Abram D. Brantley, Smoking Ban v. South Carolina extreme Denial of Access to the courts SCDC policy GA 0603 Legal MAIL Robbery. Instead of condemnation by the victim to lock up, in a CURA 18 USC § 3771 Criminal victim Rights Act procedure to the U.S. Court of Appeals. The victim Appellant under Duress, complied gave first pages of Writ of Mandamus Petition to Business sector Mr. Barber, October 30, 2024, supra grievance followed. On April 8, 2025, without watered Legal Stamp, post office mark date, by Infractor Mr. Furman who was Co-star with Mr. Barber in Step 1 Grievance Litigious Act received from State of South CAROLINA Administrative Law court Edgar A. Brown building 1205 Pendleton Street, Suite 224 Columbia S.C. 29201. An Egregious NON EVIDENTIARY ORDER by Administrative Law Judge J. Phillip Leshi. The Ledger FIRST Synopsis gave atrocious "March 31, 2025 filed Motion to SUPPLEMENT" the Record for Liability / Rule 54 Demand for Judgment requesting \$3 million in compensatory and \$7 million in punitive damages. When on March 30, 2025 via Christina Cabel Bigelow Esquire, Lauren Stevens Staff Attorney SCDC Division of Legal Counsel, and Compliance, Cheron Hess Administrative Coordinator office of General Counsel gave signature on motion to Dismiss NO Rule 56(c), 65 Affidavit subjecting themselves under the penalty of perjury Personal Knowledge. Anderson v. Liberty Lobby, Celest x Corp v. Cadrett. The Immediate Reply was due to mockery violation of Axiom Rules Precedent Governing Law for ALL U.S. Judicial Forums procedure supra "SUPPLEMENT" for the "PREJUDICE" Preliminary extraordinary circumstance motion February 25, 2025 mailroom Wednesday February 26, 2025, official capacity for GENERAL COUNSEL SOUTH CAROLINA DEPARTMENT OF CORRECTIONS, Compensating, Punitive, foreseeability, Awareness duration, and attempt to conceal the "Motion for preliminary Injunction, S.C. Civil Rule 65 / Summary Judgment S.C. Civil Rule 56 ALC Special Appeals Rule 60, 63. Enclosed Appendix Affidavit (A) Attachments (1-23) Essential evidence of Impede offense supra NON EVIDENTIARY Appalling. WHEN DENIAL of Mail Transit to court. IS ALREADY MAJOR PREMISE of TORT for magna culpa lesser LIABILITY Responsibility. There is NO WAY THEY RESPOND IN SUCH... ELLIPSIS. OMISSION THERE'S NO Preliminary INJUNCTION S.C. Civil Rule 65 / Summary Judgment Civil Rule 56 ALC Special Appeals Rule 60, 63. The Result preterLegal 18 USC § 1701, 1702 obstruction mail correspondence. Therefore unjust fundamentally UNFAIR DECISION. AN ARTIFICE CHEAT faced with conspiring Bitter. Except for the "ENTIRE RECORD" fundamentally FAIR S.C. Administrative Law court, NO Sea Spade Sea Petition INVESTIGATION, for "SUPPLEMENT" motion explanation. Which should NOT RECEIVE ANOTHER CHANCE. This HONORABLE COURT CAN MAKE the Just Preliminary Complains v. SCDC Decision Being too Universal STUNNING JAW DROPPING. Deliberate Indifference VACANT OF STATE LIBERTY RIGHT TO DUE PROCESS Article 1 § 3 S.C. Constitution, 14th Amendment U.S. Constitution, Article 1 § 9, S.C. Constitution Quick SPEEDY FULFILLED, CONCRETE. IRONCLAD CURF... "Remedy" for the FIRST LIABILITY proposition pg. 8

Within Preliminary motion do ALC. Now the supra "SUPPLEMENT" DEMAND Rule 54
JUSTIFIED DILATORY INJUNCTION IS NOT THIS CASE. HIS MAIL WAS PROTECTED as a Natural
LIBERTY PROPERTY RIGHT. SO Instant prima facie. After scanning first pages Handwritten Petition
APPROVAL from Phantom employee General counsel to OBLITERATE Access to the court right
October 30, 2024, for CANNOT 10-14 debit postage mail Due to HANDWRITTEN PETITION
Emotional Intangible, Tangible INJURY. Due to the FIRST HAND FACTS. ASTRONOMICAL
Magnitude EXTREME DENIAL AGAIN. Rule 65 has established Abram D. Braucbay has
suffered will suffer immediate, irreparable harm without injunction (2) more than likelihood
of success on the [ENTIRE] examine merits. (3) He has NO ADEQUATE remedy at LAW
Besides Preliminary Injunction, supra COMPTON proclaims May 28, 2005 Forma Payper's
ORDER for this Initial Brief MOTION for preliminary Injunction J.C. Civil Rule 65/
Summary Judgment J.C. Civil Rule 56 within J.C. Court of Appeals was the Badge to
Due Process by the Honorable court, knowing Redress is WARRANTED. The victim Appellant
movant Fecht TRUE Administration of JUSTICE once this APPEAL is Examined and
GRANTED. The Appellant is Appreciative. An END to him and his family from being victimized. NO
Human should have their legal mail Robbed out of mail box of a citizen or of a
pre-citizen inmate. Malevolent Artifice of Treacherous Unusual punishment, DENIAL of
Fundamental constitutional Right Article I & 15 J.C. constitution, 8th Amendment U.S. constitution.

AVERTMENT of the Case

The Appellant victim Grievant Plaintiff once more April 8, 2025, received shocking to Legal procedure in this case NOT Astonishing dealing with the Genuine Material Facts that cannot be disputed. The Appellant retrieved S.C. Administrative Law Court order S. Phillip Lentini Acting Judge. "IT IS HEREBY ORDERED that the Department Motion to Dismiss is GRANTED and this appeal is hereby DISMISSED. IT IS SO ORDERED. According to Due Process the next step Honorable S.C. court of Appeals. Record displays Pellucid and Decision... NO... The Acting Judge S. Phillip Lentini, DID NOT GET NEXUS Forthissimo Proof of SCDC policy GA 01.03 VIOLATION Access to the courts Extreme DENIAL. Wednesday February 26, 2025, The Appellant Plaintiff, placed in the Federal State Postage Authority Mr. Furman TWO MOTIONS Document Exhibits 1-23 Attachments "Motion for preliminary Injunction S.C. Civil Rule 65/Summary Judgment S.C. Civil Rule 56 ALC Special Appeals Rule 60, 63" One for S.C. Administrative Law Court Edgar A. Brown Building 1205 pendleton St. Suite 224 Columbia S.C. 29201. The other office of General Counsel 444 Broad River P.O. Box 21787 Columbia S.C. 29221-1787. The Two documents Reveal of the ORDER, NOT one motion was sent Postage Transit and NOT ONE MOTION WAS filed after being retrieved via mail. Due to such on March 2, 2025 Office of General Counsel filed these Motion to Dismiss. Supra grant by LAWMAN S. Phillip Lentini for Dismissal. The Appellant plaintiff knew according to Axiom S.C. Civil Rule 56(c), and S.C. Civil Rule 65 "Ignorant" to the "OMISSION" of Imperative priority motions. There is no way the Appellee Defendant made mockery of the court by sending this PRIVOLOUS, Jargon with no genuine issue of material fact to combat with personal first hand knowledge to PRECLUDE Summary Judgment in FAVOR of Appellant plaintiff Grievant. On March 31, 2025, The Appellant Added liability due to such attempt to Despoil pilage. Filed Motion to Supplement the Record for Liability/Rule 54 Demand for Judgment requesting \$13 million in compensatory and \$7 million in punitive damages. These missing disappearance of Clamderhine priority Legal mail motions violating their liberty Essential Right constitutional

Article 1 § 2, 3 S.C. Constitution, 1st, 14th Amendment U.S. Constitution Due Process. Begs
the question does anyone within the state of South Carolina have any elementary lay
person legal understanding concerning Access to THE COURTS for the Reasons of Furrer/Barber
HANDWRITTEN Petition to David Copperfield missing motions. From on November 30, 2023 CURA
criminal victim Rights Act procedure 18 USC § 3771 U.S. District Court 22-54 Habeas Corpus
Greenville S.C. U.S. District Court Alexandria VA U.S. Court of Appeals designated phone call
Tony Webb (804)-916-2700 according to congressional law. The Appellant plaintiff in Emotional
Distress, Anguish on November 18, 2024, the Appellant had to send through GENERAL MAIL
R.S. 11 [SEE ^{Appendix Attachment} Attachment (6)] his petition to his mother Dorothy Burgess just to get the ordered documents
to the U.S. District Court Greenville S.C. he didn't have necessary funds or got postage prior,
Due to malicious conspiracy. October 30, 2024. IMMEDIATE GRIEVANCE was filed step 1
NO. WRIT-0150-24 Stamped. Warden Beckwith, Associate Warden Waukey, Associate Warden Long
"Office of GENERAL COUNSEL" assisted in the CURA Appellant process November 25, 2024,
committed conspiracy denying the Grievant Action requested. Step 2 grievance November 26, 2024
On December 18, 2024, official capacity Deputy Director of operations signature NOT legible
colluded with warden's guilt signed by Appellant 1-9-25 for Justice 1-12-25 Notice of
Appeal. SEE AFFIDAVIT (A) ATTACHMENTS (1-23). The Actual copy of
"Motion for preliminary Injunction S.C. Civil Rule 65/ Summary Judgment S.C. Civil Rule 56
ALC Special Appeals Rule 60, 63" AVOIDMENT OF THE CASE.

STANDARD of Review

S.C. Court of Appeals May 28, 2025, order Forman Pappas grant costs All expenses
initial Brief/Motions Rule SCACR Ex parte Martin 321 S.C. 533, 535, 41, D.E. 2d, 134, 134-35
(1995) S.C. Code § 1-23-610, § 18-1-10, SCACR 20 Right to Appeal Civil Rule 65 preliminary
Injunction Shingis-Dill, Inc v. Israel 442 S.C. 48, 197 S.E. 2d 201 January 24, 2024 for
sound discretion to protect the rights of moving party... sufficient to support prima facie
"moving." Cumpton v. SCL 392 S.C. 361, 709 S.E. 2d 639 May 2, 2011 "To preserve status quo
and prevent irreparable harm to the party requesting it." Sea broad Marine Ry. v. Atlantic
Coast Line R.Co. 88 S.C. 477 71 S.E. 39 April 25, 1911 "Where an application for an injunction
is refused without stating any reason, the only question arising on appeal is whether, upon the
complaint and its supporting affidavits and upon the return and its supporting affidavits,
there is a prima facie showing warranting an injunction." [If the Honorable Court decides
lapse of time] Structural Genuine Issue of material fact that CANNOT BE REFUTED under
Governing Law Civil Rule 56(c) Summary Judgment MUST BE ACCEPTED due to OMISSION
MAJING MOTIONS, for preliminary Injunction 2/25/25 within GENERAL COUNSEL, Administrative
Law Court Ledger Entire RECORD. S.C. case 51-11-460 LIABILITY JURISDICTION AUTHORITY
SCRACT 208 (a)(1)(2)(3)(4) Priority Image.

Summary Judgment stage the moving party has the initial responsibility of informing the court
of the basis for its motion, and identifying those portions of the pleading, discoveries answers to
interrogatories and admissions on file together with affidavits "If any which the moving
party believes demonstrate the absence of a genuine issue of material fact." Anderson v. Liberty
Lobby Inc 502 S.Ct. 2005 (1991) Woodson v. DCE Properties Ltd 406 S.Ct. 517, 705 S.E. 2d 428
(2004) Rule 56(c) SCACR, According for the purpose of Summary Judgment, a material fact is a
fact that might affect the outcome of the case under the governing law, more over only
disputes over facts that might affect the outcome of the case under the governing law will
properly preclude the entry of Summary Judgment, importantly factual disputes that are
irrelevant or unnecessary should not be counted or even considered during the Summary
Judgment stage at all, Anderson, supra at 2005. In determining whether any triable issues of fact
exist the court must favorably to the non moving party, Martin v. New York 501 U.S. 222, 115 S.Ct.
2004 (1991) Lord v. Dand Enterprises Inc. 402 S.C. 504, 757 S.E. 2d 605 (S.C. 2004)

Inasmuch while the evidence of the non-moving party is to be believed, and all justifiable inferences must be drawn in the non-movant's favor, a party cannot create a genuine dispute of material fact through mere speculation or amputation of inferences, Reese v. CTR Trans, 150 F.3d 326 (4th Cir. 1998) Beal v. Hardy 769 F.2d 213 (4th Cir. 1985) It must be amplified that, during the Summary Judgment stage credibility determinations, the weighing of the evidence, and the drawing of legitimate inferences from the facts are jury functions, and not those of the court Anderson supra at 2513. Likewise in applying the preponderance of the evidence burden of proof standard, the non-moving party is only required to submit a mere scintilla of evidence in order to withstand a motion for Summary Judgment, Hancock v. Wood South Mgmt Co. 381 F.C. 326, 673 F.E.2d 801 (F.C. 2004) what is more Summary is not appropriate where further inquiry into the facts of the case is desirable to clarify the application of law. Lanham v. Blue Cross & Blue Shield, 344 F.C. 376, 363 F.E.2d (2002) Summary Judgment is a drastic remedy it should be cautiously invoked to ensure a party is not improperly deprived of a trial on disputed factual issues Madison ex rel Bryant v. Babcock Ltr. Fne. 321 F.C. 123, 638 F.E.2d 670 (2006). In deed if a jury could return a verdict in the non-movant's favor there is a genuine issue of material fact in dispute, which requires a trial Anderson supra at 2513. Likewise the threshold question for the court during this stage is whether the evidence is so one sided, that one party must prevail as a matter of law Harrell v. Percell, 236 F. Supp. 2d, 526 (M.D. N.C. 2002) critically Federal Rule 56(c) FRCP, provides that when a motion for Summary Judgment is made and supported as provided by rule, an adverse party may not rest upon the mere allegations or denials of the pleadings, but his [response], by affidavit or as otherwise provided in this rule, must set forth specific facts showing that there is a genuine issue for trial. If she/he does not so respond Summary Judgment if appropriate shall be entered against him (Lotex Corp v. Catrett) 106 S.Ct. 2348 (1986)

Imbratio I

It is Genuine Issue of material FACT The victim Appellant's Due course Administrative Procedure ACTUAL has been OBSTRUCTED, IMPEDED. Kiosk Reference REQUEST 25-03841945 2/24/25 3:16 PM identified received by mailroom Furman. "Imperative Legal Mail Administrative Law Court delay. NEED mail transit. Thank you 2/24/25 7:08 AM sent "MOTION for preliminary Injunction J.C. Civil Rule 65/ Summary Judgment J.C. Civil Rule 56 ALC Special Appeals Rule 60, 63" Administrative Law Court GENERAL COUNSEL OFFICE. Disappearance of PRIORITY VITAL LEGAL MAIL For Adjudication of matter in Appellant Behalf when mailroom/Business sector are Responsible for Denial of Access to the court GA 01.03 JDC policy WITHHOLD/CONTRIBUTE Preliminary Injunction Summary Judgment is WARRANTED as a matter of Governing LAW.

Mail Transit a Citizen, Employee of a business corporation, Employees of such entities NEED PRIORITY MAIL Transit. Especially firms Penal systems Institutions NEED Legal MAIL TRANSIT CORRESPONDENCE. The victim Appellant in a Criminal victim Rights Act Wait of Madam Justice procedure NEEDED this simple Elementary Lawful Legal process 1st Amendment Freedom liberty of State, Interest Right. Due Process LAW VIOLATION comprehension problem HANDWRITTEN petition The Appellant knows as well as the staff the US District court is in Policy GA 01.03 w/ LEGAL MAIL priority destruction. On October 30, 2024, Furman mailroom Baker Business sector COLLUDED with the Authority of a Scientist. Baker decided to make sure mailroom OBSTRUCTION was committed "NO HANDWRITTEN PETITION AUTHORIZED Exclaim. [SEE AFFIDAVIT CAPS] ATTACHMENT (1-23)] The Appellant in Legal Battle knew there was NO WAY there would be an CONTINUUM scheme HEARSAY on February 26, 2025. The Appellant victim, Plaintiff confident to get the LEGAL VITAL MAIL to the Administrative Law Court "TODAY", and GENERAL COUNSEL. 1205 Pendleton Street Suite 224 Columbia S.C. 29204, 4444 Broad River Rd. Columbia S.C. 29221-1787. He sent on circa Kiosk Request 25-03841945 7:08 AM "Imperative Legal mail Administrative Law Court TODAY" February 26, 2025. The Appellant argues, it this a coincidence meram-webster Dictionary Refines - a situation in which events happen at the same time in a way that is not planned or expected. Was at that point in Time for the Appellant to expect these Two PARAMOUNT MOTIONS in which Any TRUE LAWYERMAN, LAW MAN will decide according to the Standard Review Authority to Preliminary Injunct, Rule, Plead, AUTHORIZE, DETERMINE COMPLETE, and SETTLE this Extraordinary Circumstance case in the victim Appellant Favor

TO EVANESCE. According to Article 1 & 3 U.S. Constitution, 14th Amendment U.S. Constitution, just look forward to TWO MOTIONS for Abstract Judgment to DEMATERIALIZED or Did the Warden's office staff, Business sector, Director office of operations, GENERAL COUNSEL office in SYNDICATE, decide to VANDERBILT These LEGAL ACCESS TO THE COURT DOCUMENTS to Abandon from Guilt COINCIDENCE or... CONSPIRACY merriam Webster Dictionary - a secret plan made by two or more people to do something that is harmful or ILLEGAL IMPROPER § 15-28-70(b) moral Turpitude Encumbrance unprofessional impropriety § 16-9-310 nefarious scheme. The court must DECIDE between These Two Terms this case has the CRYSTALLIZE TERM for ENTIRE RECORD DEMAND. IN ORDER FOR THE Administrative Law Court JUDGE J. Phillip Leski to JUSTLY DETERMINE. OMISSION merriam Webster Dictionary something that has not been included or done SHOULD NOT HAVE BEEN DONE.

A Federal OFFENSE 18 USC § 1701, (1702) was quoted to Barber October 30, 2024. This Honorable Court CANNOT CRIMINAL CONTEMPT CONSPIRE to Agree with NO ENTIRE WHOLE RECORD. To make SOUND Fundamentally FAIR, Carnage of JUST Reasonable, Tenable, INCONTROVERTIBLE, INDISPUTABLE, IRREFUTABLE, LEGISLATIVE AUTHORITY GENUINE MATERIAL PART Rule 56(c), Rule 65 preliminary under Penalty of perjury trial by VINDICATION Record Procedure.

Ita Lex Scripta Est S.C. code § 1-23-610(B)

"The REVIEW of the Administrative Law Judge under MUST be confined to the "RECORD" The Court may not substitute its judgment for the judgment of the Administrative Law Judge as to the weight of the evidence on questions of fact. The Court of Appeals may affirm the decision or REMAND THE CASE for further proceedings, or, it may REVERSE or MODIFY the decision if the substantive rights of the petitioners have been PREJUDICED because the finding conclusion or Decision is:

- (a) IN VIOLATION OF CONSTITUTIONAL OR STATUTORY PROVISIONS... OFFENSE UNDER procedural codes
- (b) IN excess of the statutory authority of the agency or FDC policy violation... genuine
- (c) made upon unlawful procedure... pre-legal omission, NO ENTIRE RECORD substitute without Evidence... genuine
- (d) affected by other error of law... legitimate conspiracy
- (e) clearly erroneous in view of the reliable, probative and substantial evidence on the WHOLE RECORD... Bona fide
- (f) Arbitrary or Capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion... TRUE

VINDICATE PAIN ANGUISH IRREPARABLE HARM WITH ONLY ONE DECISION
FROM THE WHOLE RECORD. REVERSE, INJUNCT, AND MODIFY according to the
March 21, 2025 " MOTION TO SUPPLEMENT THE RECORD FOR LIABILITY / Rule 54 Demand
FOR JUDGMENT, THAT WAS SENT DUE TO COMPREHENSION OF RIGHTLY CONSTRUCTED LAW
RULE 56 (G) AS ERROR OF JUDICIAL PROCEDURE PROCESS. PREJUDICE
AFFECTS SUBSTANTIVE RIGHTS HAVE BEEN ANNIHILATED STATE LIBERTY MOCK. SEE AFFIDAVIT
AFFIDAVIT (B) ATTACHMENT (9).

Administrative Law Judge J. Phillip Lezki should get an REMAND, but the
Appellant is Afraid, Fearful The mail might NOT GET TO ITS DESTINATION GENERAL COUNCIL
MIGHT INTERCEPT. THIS COURT NEEDS MUST, OUGHT ITS ESSENTIAL AN REQUIREMENT THE SAME POST
OFFICE SERVICE FOR SABOTAGE; LEGAL SABOTAGE COULD BE INVOLVED. THE ADMINISTRATIVE JUDGE MUST
NOT GET THE CHANCE WITH THIS DRASTIC CASE. THIS HONORABLE COURT BY LAW REQUIRE
MUST MAKE AN PRELIMINARY INJUNCTION. Al-Shabazz PRELIMINARY AUTHORIZATIVE PRONG
S.C. CODE § 1-11-460 FOR REDRESS LIABILITY SEE Allen v. JCOC SUPREME COURT, 886 S.F. 2d 671, 439
S.C. 164 APRIL 5, 2023. Al-Shabazz - "Denial" OF THE INMATES DUE PROCESS... PRELIMINARY INJUNCTION
Al-Shabazz DENIAL OF [FEDERAL] STATE CREATED LIBERTY INTEREST TO BE ENTITLED TO RELIEF
FOR THE "DENIAL" OF HIS [MAIL TRANSMIT] DUE PROCESS RIGHTS - PRELIMINARY INJUNCTION RULE 65
[SEE AFFIDAVIT (A) PRIMA FACIE MOTION FOR PRELIMINARY INJUNCTION FEBRUARY 25, 2025]
Al-Shabazz - ADMINISTRATIVE DECISION BY SCA WOULD BE REVIEWED ONLY FOR A "DENIAL" OF THE
INMATES DUE PROCESS RIGHTS... Preliminary Adjudication, Genuine Issue OF MATERIAL FACT THE
"TORTFEASORS" CANNOT BE RESPONSIBLE AS MALE FACTORS BY COMMITTING MORE OFFENSES FOR CONTEMPT
OMITTING ESSENTIAL SUBSTANTIAL EVIDENCE ACCORDING TO TRIBUNAL STARE DECISIS PROCEDURE AND NOT
BE HELD MORE LIABLE. WITH A PHONE CALL TO WARDEN DON BECKWITH OFFICE TO ENSURE. THE
APPELLANT'S MOTHER MR. CROTTY BURGESS AS WELL. THE P.G.A. BIOLOGICAL MOTHER OF THE COMPENSATORY
PUNISHMENT FOR YOUR SON IS FINALIZED. JUSTICE FOR MR. ABRAHAM D. BRAUNBOY IS TANGIBLE NO ONE
WILL INTERFERE WITH THIS LEGAL LAWFUL PROCEDURE TO VINDICATE Bonds v. Smith

92 Oct. 1991 430 U.S. 817, 52 L. Ed. 2d 1471 ^{April 27} DENIAL Access to the courts. This is genuine issue of material fact that cannot be responded to. The Atties General Counsel in CUSA process can NOT DENY the WHOLE, ENTIRE, TOTAL Record. Read, examine the missing but received "Motion for preliminary Injunction J.C. civil Rule 65/ Summary Judgment J.C. civil Rule 56 ALC Special Appeals Rule 60, 63 2/25/25 NO Scintilla can be given of any Essential substantive Factual Evidence to PRECLUDE Appellant victims Ruling, Elipsis NEVER IMPEDE AGAIN... more than substantial.

"Substantial Evidence when considering the record as a whole would allow reasonable minds to reach the same conclusion as the Administrative Law Court and is more than a mere scintilla of EVIDENCE."

J.C. Coastal Conservation League v. J.C. Dept of Health + Environmental Control
669 F.2d 899 2008 WL 4693075 (J.C. App. 2008)

NO FIRST HAND Under Oath Personal Knowledge Affidavit to Combat
NO CONSIDERATION for Legal Jurisprudence, Rectitude, Ethical Triumph in
a J.C. Civil Rule 56(c), 65 Structural Procedure

The GENERAL COUNSEL according to the Appellant's Supplement SCOC

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS as an Entirety S.C. code of law 51-11-460

[SEE AFFIDAVIT B Attachment 9]

The AGGREGATE QUANTUM

\$ 3,000,000.00	\$ 7,000,000.00
Three million	SEVEN million
COMPENSATORY	REACTIVE
FOR TORTIOUS	LIABILITY
Equity rights	errors

For this Honorable Court of Equity ^{S.C. code} § 14-1-50 Regular execution under S.C. code § 15-78-5000 by RIGHT OF VICTIM Appellant. Due to S.C. code § 15-78-2000 now immune from suit PROVEN that Employee conduct was NOT WITHIN the scope of their official duties and that it constituted ACTUAL FRAUD, ACTUAL MALICE, INTENT TO HARM, and CRIME involving Moral Turpitude MISCONDUCT S.C. code § 8-1-50. This Preliminary INJUNCTION Summary Judgment that Respondent CANNOT CONTEST MUST CONCEDE PERFECT TO PERMANENT DAMAGES FOR GOOD AND FAIR CONFERENCE LAMB v. NEW YORK LIFE Insurance company S.C. SC 147 S.E. 146, 147, S.C. 353 October 19, 1928

This A D D E M P L U M will BE According to Ex. Figure Two § 1-11-460 Imbralia II

\$ 20,000,000.00

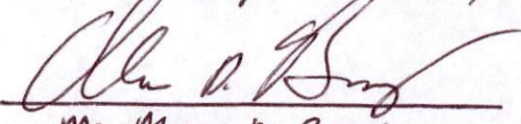
" A MAXIMUM OF TWENTY MILLION DOLLARS " S.C. code § 34-3-65 Arrest Debt obligation for FINANCE of SCOC must upon order of Forum discuss with the victim plaintiff. Appellant will can concerning the disbursement Attribution of Finance to establish accounts wire transfer with desired Financial Transfer Institutions, Wells Fargo Private Bank to establish Swiss wire conduit Deposit accounts. As Deem fit by Plaintiff. The plaintiff needs the court's Clearance authority with Institution Authorities if still present incarcerated, P. O. A. Dorothy Bugger must be apposed (803)-351-8460 as well for completion of Debt obligation."

May it BE DONE upon Tabula Rasa now Etched in Ledger on circa Day of our

LORD

6/17/25

DATE


 Mr. Abraham D. Brueck

CONCLUSION

1st Amendment U.S. constitution, Article 132 S.C. constitution DEMANDS THE RIGHT of the people regardless of Penal incarceration to Lawfully Petition the government, any Department thereof for redress of GRIEVANCES. The S.C. or any public school for some reason S.C. Department of corrections Wateree Corr. Institutional mailroom staff, Business sector, Warden's office SCDL Director office of Operations, GENERAL COUNSEL, DID NOT RECEIVE this comprehension. The school system Failed the Tortfeasors, therefore a Receiptful plan seeking NOUICIOUSLY to violate such Fundamental Authority, Access to the courts is Access to Justice. To approve or GENERAL COUNSEL an congressional procedure only to DISALLOW the Law of the LAND constitutional Right. The substantial essential Evidence was predecelegally DENIED conspired by these Scientists Deniers. Whole Record antiquity of Truth has now BEEN RIGHTFULLY placed in JUSTICE HANDS. Treaculent unprofessionalism CANNOT CONTINUE... PUNISHMENT to INQUIRERS. NONFACTOID GENUINE MATERIAL FACT FIRST HAND KNOWLEDGE ELIPSIS PREJUDGE SHALL NOT IN SUMMARY BE TAKEN AWAY. Respondent has NO AFFIDAVIT penalty of perjury, personal Knowledge, MUST CONCEDE, ORDER PROCUREMENT MUST BE DONE. Beyah v Coughlin U.S.C.A. 2nd circuit ⁽¹⁹⁸⁶⁾ Fed 986, 189 Stenorian witness. ALSO TRUE FORUM S.C. court of Appeals LAW COMMANDER. ORDER VINDICATION for Mr. Abram D. Brawley and Family. This is Accession Due Process.

THE STATE OF SOUTH CAROLINA
In THE Court of Appeals

APPEAL From RICHLAND COUNTY
Administrative Law Court

Sebastien Phillip Leath

Case No. 2025-000715

State of South Carolina Respondent
Abram D. Brueby v. Appellant

PROOF of Service

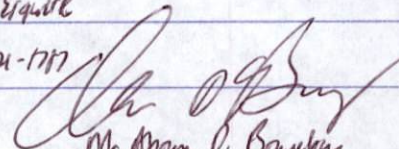
I certify that I have served the Motion for Preliminary Injunction SC Civil Rule 67 / Summary Judgment SC Civil Rule 56 "Appendix B" (1) (b) Attachments 1-25, 1-9. By depositing a copy of it in the United States mail, postage pre paid, 6/17/25, addressed

Administrative Law Court
Edgar A. Brown Building
1207 Pendleton Street Suite 204
Columbia SC 29208

J.C. Court of Appeals
Jenny Abbott KIRKHEWIT
Clerk P.O. Box 11624
Columbia S.C. 29211

office of
GENERAL COUNSEL
Christian C. Boynton, Esquire
P.O. Box 21717
Columbia S.C. 29221-1717

CONTENT TRUE AND CORRECT
28 USC 5174b


Mr. Abram D. Brueby
P.O. Box 119 Barn 2-5-B
Lynchburg Correctional
Reformatory J.C. 29126-0184

THE STATE OF SOUTH CAROLINA
In THE COURT OF APPEALS

A P P E N D I X

APPEAL FROM RICHLAND COUNTY

ADMINISTRATIVE LAW COURT

Sebastian Phillip Lenki

§ 16-9-10
penalty

CASE NO. 2025-000715

A F F I D A V I T
(A) (B)

1-23

1-9

Entry within COURT LEDGER ESSENTIAL EVIDENCE Affidavits under
Penalty of perjury 28 WCL 1746 personal Knowledge Attachments [1-23] [1-9]
For Preliminary INQUIRY/Summary Judgment Article 203 S.C. Constitution
14th Amendment U.S. Constitution Due Court and Process of Law

Alonzo D. Brantley
204227
Western CI Burn 2-5-B side
Highway 261 P.O. Box 189
Rembert SC 2928-0189

State of South Carolina

Mr. Abram D. Bowley
Appellant

v.

S.C. Department of Corrections
Respondent

S.C. Court of Appeals

Case No. 2025-000715

AFFIDAVIT

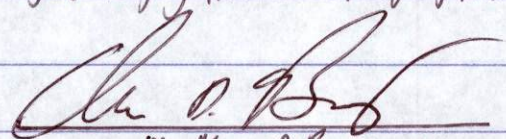
(A)

I, Mr. Abram D. Bowley, declare under the penalty of perjury, I am the Appellant, Plaintiff in this hereto captioned case with personal knowledge of the facts, and being competent to testify forthwith this Affidavit to support my motion for Permanent Preliminary Injunction/ Summary Judgment.

I. The motion that on Wednesday February 26, 2025, Into the hands of Mailroom personell Furman Kiosth Reference No. 25-03841945 7:08 AM MANDATORY, REQUISITE RECORD. That motion for preliminary Injunction. S.C. Civil Rule 65/ Summary Judgment S.C. Civil Rule 56 ACC Special Appeals Rule 60, 63. The very copy that was the Administrative LAW COURT S. Phillip LenSKI, Abstract Judgment obligation for preliminary Injunction GRANT. General counsel CONCERN TO TALENT CASE. The MOTIONS sent "Disappeared" COLLUSION to obstruct with already factual October 30, 2024, General counsel agreement SCDC Beckett personell as witness. After scanned pages of Retikin Barber Business to GENERAL counsel. Feb 26. Denying 18 W.C. § 1701. (1702) postage mail to Article 1 & 2 S.C. Const, 1st Amendment U.S. Const. Access to the courts GA0103 Court Entity U.S. District Court. LIABILITY mailroom Furman, Business sector Barber. Warden office Don Beckett, AW Long, AW. Wackley, Director of Operations, GENERAL COUNSEL SOUTH CAROLINA DEPARTMENT OF CORRECTIONS Entirely. Unprofessionalism Deliberate Indifference, Gross Negligence, Awareness, foreseeable official capacity, DEMANDS for Permanent preliminary injunction. S.C. Code § 15-78-20(b), § 15-11-460 1-23 Attachments

Pursuant to 28 W.C. § 1746, I declare under the penalty of perjury that the foregoing is true

6/17/25
DATE



Mr. Abram D. Bowley #280275
Wadlee Corr. Inst. Room 2 Room 5
8200 State Farm Rd. P.O. Box 188
Clemson S.C. 29628

STATE OF SOUTH CAROLINA

Mr. Abram P. Bradley

Appellant,

v.

S.C. Department of Corrections

Respondent.

ADMINISTRATIVE LAW COURT

CASE NO.

"Motion for preliminary Injunction

S.C. Civil Rule 65 / Summary Judgment

S.C. Civil Rule 56 ALL Special Appeals

Rule 60, 63"

AVERMENT OF THE ISSUES ON APPEAL

[Preliminary Injunction Authority]

The Appellant victim migrant, in mental anguish, sub justice striking by general concerning Major Cuba upon SCDC Welfare personal capacity employee former mailman got held de te Duane Barber Establisging J.C. rule 51-23-350 (A)(5)(c) Jurisdiction violation of the State Liberty Due Process Article 15 3 S.C. Constitution 14th Amendment interest essential GA 0603 Access to the Courts Right 14 Amendment, Article XII 2 211 Const Supd 12/18/24 Erroneous Decision County v Smith 430 U.S. 817, 97 S.Ct. 1441 2 L.Ed. 2d 72 (1978) AL-Shabazz v State 338 S.C. 354, 576 S.E. 2d 527 S.E. 2d 742 754-57 (2000) Article 15 15 S.C. Constitution 8th Amendment U.S. Const. Cruel unusual punishment. The Appellant in Extrajudicial RATE CROSS DENIAL...for... POSTAGE MISC Fairly Ma Vabu "HANDWRITTEN PETITION." Barber, while conducting a congressional 18 WLS 5711 criminal victim Right Act procedure from 12/17/23 until present day. Wade Beckwith welfare entire OVERSIGHT Staff along with the non opposition Actual Atty General Counsel AUTHORIZED MANDATORY CURA Madam's phone call Superior case Manager Tony Webb (804) 916-2702 U.S. Court of Appeals 4th Circuit, Witness General Counsel themselves excluding whenever gave authority to conspire against postage according to Mr. Barber for "HANDWRITTEN PETITION" 11/30/24 Barber while Appellant under Duress retrieve first pages of petition from General Counsel. Essential Affidavit Attachments of Evidence Genuine material fact under penalty of PERJURY Personal Knowledge. Fine numero Works Electronic Request Reference / best record 12-50017 Inmate Requests quote to Business Sector Barber (PWC 51201. This Appellate procedure DEMAND Civil Rule 65 IMMEDIATE Preliminary Injunction Cumpton v SCDC 342 S.C. 361, 204 S.E. 639 5/2/11. Axiom Civil Rule 56 structure Abstract ADJUDICATION without General Counsel consent when agreed with Supremacy Clause Article VI sec (2) procedure legally lawfully CURA And then pre-legally unlawfully conspire with Business Sector 15-71-70(b) Mr. Barber 42 WFS 2000 dd-0 (2/12) 10/30/24. Wade office even midroom Summary Judgment MUST BE ENFORCED to STOP 1 Grievance ACTION REQUEST Barber GRANT SCDC Form 11.04 corrective ACTION 4.4.2, 4.4.4, 020 unprofessional conduct, unethical conduct 090 negligence in carrying out professionalism 180 willful misconduct Intentional Improper Behavior willful waste disregard 170 Institutionalization failure to be cooperative with supervisor. The victim Appellant migrant should NEVER BE PREJUDICE so send his mother by general mail actual legal MAIL when GA. 0103 11/11/24 Court Satiny W. District Court with PROTECTOR JUST for postage. Appellate 1 Added. Injunctive decision substantial Evidence of elementary Law. Equals prospective Respite Inoperable Hum if NO preliminary Injunction is solicited NO Appeal can be done by respondent Extrajudicial Injunction W/ AUTHORITY. official capacity maintenance. egregious Denial J.C. Code 5-24-1-200 100,000.00 Negligence Reckless Indifference. SA Atc Rule 56 Necessary paper for Justice. ALL Decision cannot be returned Respondent HAD NO substantial EVIDENCE or controlled by some error of Law S.C. Code 56-23-60.

AVERTMENT of the CASE

The Appellant victim Grievant Plaintiff, from circa November 30, 2023 6:35pm Manning Pre-Release Center has been pending in a CRIMINAL VICTIM RIGHT HABEAS CORPUS PROCEDURE CONGRESSIONAL LAW 18 USC 3771 (Jack April 8, 2024, Administrative Transfer to Waterce Corn Institution Manifest arrival the difficulty with simple state and Federal Elementary procedure has been continuously hindered, impeded by unprofessional Action employee former mailroom. See U.S. Court of Appeal 28 USC 457 record. Kink not Mr. within Body. And the business sector since arrival Mr. Barber being in conspiracy maliciously to execute impropriety misconduct deliberate Indifference. See Appendix Affidavit Attachments. On October 30, 2024, the myriad of violations had come to an Egregious Appalling Encumbrance. Due to NOT having the necessary funds, requisite 10-14 Debit form was required for legal postage. The LATE PERSON NEARZOUS DENIAL OF MANDATORY ACCESS TO THE COURT SCOC policy STATE liberty Essential Right constitutional Article 182, 3, SC constitutional 1st, 14th Amendment Due Process. After former Denial of Postage PS 16.08 11.1, 11.1, GA 01.03 16.1 for "Legal MAIL" Debit 10-14 SCOC form once again Business sector Barber called upon to solidity violation. Mr. Barber upon agreement of policy, pertaining to postage went another FALLACY REASON to DENYING Appellant access... Petition cannot "BE HANDWRITTEN." IN shock THE APPELLANT WAS TOLD to give documents of petition to Mr. Barber for SCANNING TO AUTHORIZED RECORD consent FOR U.S. COURT OF APPEALS Supervisor CASE MANAGER Phone call Tony Webb (804-916 2200). To SCOC GENERAL COUNSEL, GENERAL COUNSEL according to Mr. Barber MUST RECEIVE documents for "CLEARANCE," to mail Imperative COURT ORDERED SCOC policy, congressional, Legislative state constitutional Article 1824 Appendix. Authorized Entity Petition. The Appellant in Emotional Distress, Anguish being wronged quoted 18 USC 81201 complied. The officer within Room 2 would be Becker gave reply from GENERAL COUNSEL. On October 30, 2024, in conspiracy the Appellant received on no from ANONYMOUS Shadow Co Scientist of General counsel. November 18, 2024, the Appellant had to send through CLEARANCE MAIL #5.11 (See Warden response step 1) his petition to his mother Dorothy Burgess just to get the needed documents to the U.S. District Court Greenville SC. he didn't have necessary funds prior ² Due to Malicious conspiracy -

NO 10-14 Form use. Base shocking to the universal sense of Justice Extreme Denial of Access to the courts Due process Rights. On 10/30/24 Immediate grievance was submitted. 11-4-24 Step 1 Grievance NO WRCT-0150-24 Stamped filed, Warden Beckwith who assisted Grievant WRCT Appellant in process on 11-25-24 sided with conspiracy. On 11/25/24 Haste Step 2 Grievance was entered stamped 11/26/24. On 12-18-24 official capacity Deputy Director of Operations signature NOT Legible colluded with ostensible guilt, signed by Appellant 1-9-25 for Justice 1-12-25 Notice of Appeal. Do NOT PERMIT 3rd Failing Review.

Structure of Review

Administrative Law court Civil Rule 65 preliminary Injunction. The Structure of Genuine Issue of material fact that CANNOT BE REFUTED (2022 RULE 56C). Summary Judgment MUST BE ACCEPTED due to Ledger Record within General Counsel kiosks records as well as Warden's office watered correspondence for 18 USC § 3771 Article 1 § 24 U.S. Const WRCT Legal procedure that was ADHERED. Such JUSTICE PRECEDENCE IS AUTHORITY. Special Appeals Rule 60 (15) (C), Rule 63 Any motions filed shall be in written form and shall state the grounds for relief and the relief sought. Summary Judgment Stage the moving party has the initial responsibility of informing the court of the basis for its motion, and identifying those portions of the pleading, deposition, affidavits to interrogatories and admissions on file, together with affidavits, "if any," which the moving party believes demonstrate the absence of a genuine issue of material fact. Anderson v Liberty Lobby, Inc 477 U.S. 242 (1986), Wrotham v. Ole Properties LLC 406 S.W.2d 517, 353 S.W.2d 428 (2014), Rule 56(C) FRCP. Accordingly, for the purpose of Summary Judgment, a material fact is a fact that might affect the outcome of the case under the governing law, more or only disputes over facts that might affect the outcome of the case under the governing law will properly preclude the entry of Summary Judgment, importantly factual disputes that are irrelevant or unnecessary should not be counted or even considered during the Summary Judgment stage at all. Anderson supra at 2510. In determining whether any dispute of fact exists the court must view the evidence and all reasonable inferences that may be drawn from the evidence in light most favorable to the non-moving party. Mason v. New York, 501 U.S. 476, 111 S.Ct. 2414 (1991); Lord v. D and J Enterprises, Inc 407 F.2d 594, 27 S.W.2d 687 (S.C. 2014). Inasmuch as the evidence of the non-moving party is to be believed, and all justifiable inferences must be drawn in the non-moving party's favor, a party cannot create a genuine dispute of material fact through mere speculation or conjecture of inferences; Beas v. CJK Trans, 152 F.3d 326 (4th Cir. 1998); Beas v. Hardy, 769 F.2d 213 (4th Cir. 1985). It must be emphasized that, during the Summary Judgment stage, credibility determinations, the weighing of the evidence, and the drawing of legitimate inferences from the facts are jury functions, and not those of the court. Anderson supra at 2513. Likewise, in applying the preponderance of the evidence burden of proof standard, the non-moving party is only required to submit a mere scintilla of evidence in order to withstand a motion for Summary Judgment. Hancock v. MHD South Mgmt. Co. 381 F.3d 326, 673 S.E.2d 381 (S.C. 2009) what is more Summary Judgment is not appropriate where further inquiry into the facts of the case is desirable to clarify the application of law. Cashman v. Blue Cross + Blue Shield, 374 S.C. 356, 63 S.E.2d (2008). Summary Judgment is a drastic remedy it should be cautiously invoked to ensure a party is not improperly deprived of a trial on disputed factual issues. Medison ex rel Bryant v. Bychucki (Gr. Inc) 371 S.C. 623, 638 S.E.2d 610 (2007). In deed if a jury could return a verdict in the non-moving party's favor, there is a genuine issue of material fact in dispute, which requires a trial. Anderson supra at 2515. Like wise the threshold question for the court during this stage is whether the evidence is so one-sided that one party must prevail as a matter of law. Harrell v. Powell, 236 F.3d 526 (4th Cir. 2002) critically states, Rule 56(C) FRCP provides that when a motion for Summary Judgment is made and supported as provided by rule, an adverse party may not rest upon the mere allegations or denials of the pleading, but his [response], by affidavits or as otherwise provided in this rule, must set forth specific facts showing that there is a genuine issue for trial. If she does not so respond Summary Judgment if appropriate shall be entered against him. Celotex Corp v. Citicredit Inc 477 U.S. 317 (1986).

It is Genuine Material Fact The VICTIM Appellant has been and continues to be in ALLIANCE with Appellee Respondent I.C. GENERAL COUNSEL concerning the Criminal Victim Rights Act procedure 18 USC 3771, Article 2824 I.C. Constitution that was granted by Justice Wadsee office Central Counsel Office, Leads Kiosk Requests, Ledger prior to IMPEDANCE of ACCESS TO THE COURTS CAL0103 VICE Policy, Preliminary INJUNCTION CANNOT BE REFUSED.

Samuel Withstan A Treatise on the Law of CONTRACTS "A contract is a promise, or set of promises, for breach of which the law gives a remedy, or the performance of which the law in some way recognizes as a duty... law does in fact attach legal obligation. Black Law Dictionary
This Exceptional circumstance of "CONTRACT" between the FLUSTIAN of conflict due to deliberate Malicious Indifferent conspiracy ICE Wadsee enforced maximum Forman, Business/Solo-phishing to the universal case of Justice to have a Mandatory Federal, State adopted legal procedure for legal phone call to CASE Supervisor MANAGER Tony Webb, Dist. court of Appeals 18 USC 3771 Rule 21(d) for Requisite Policy

Ita Lex Scripta Est, "A Petition for Writ of Mandamus asserting the rights of a crime victim pursuant to 18 USC 3771 (a) (3) shall bear the caption "PETITION FOR WRIT OF MANDAMUS PURSUANT TO 18 USC 3771 CRIME VICTIM RIGHTS" Before filing such a petition, the petitioner must notify the court of Appeals that such a petition will be filed and must arrange for IMMEDIATE SERVICE of the petition on the relevant parties. Such notification must be by TELEPHONE call to the office of the clerk during normal office hours (804-96-2204). A failure to comply with these requirements will adversely affect the court's ability to decide the petition within 72 hours as required by 18 USC 3771 (d) (3)." PROBATIVE IMPETUS VALUE.

INVESTIGATIVE LEADER KIOSK REQUESTS GENERAL COUNSEL WARREN BELLWITH COMMENT 6-18-24 Show 10/30/24 FOR LEGAL PROCEDURE ADHERENCE CASES PELLUCID AUTHORIZED AGREEMENT CONTRACTS FOR OUR PROTECT PETITION REGARDLESS OF "HANDWRITTEN" STATE OF NOJ. (GENERAL COUNSEL HAS NO CONTRAVERT PERTAINING TO PROCEDURE THAT BEGAN AT MANNING THE RELEASE CENTER ESSENTIAL EVIDENCE PRIOR THIS WORK PAY ZAFRA LEADILTY KIOSK REFERENCE RECORD

- Manning the Release Ref No. 23-03324001 mail 1/30/23 6:35 PM, 12/17/23 (020724) Response 12/23/23 9:50 AM
- Ref No. 23-03346568 mail 12/24/23 12:06 PM
- Ref No. 24-03355674 mail 1/3/24 9:16 AM 1/4/24 11:05 PM
- Ref No. 24-03381612 mail 1/25/24 9:42 AM 1/26/24 (066024)
- Ref No. 24-03380341 mail 1/24/24 10:10 PM 1/25/24 9:41 AM
- Ref No. 24-03410204 mail 2/20/24 9:57 PM 2/21/24 9:41 AM
- Ref No. 24-03415184 mail 2/26/24 8:02 AM 2/27/24 1:36 PM
- Ref No. 24-03417241 mail 2/23/24 7:06 AM 2/23/24 1:31 PM
- Ref No. 24-03575659 mail 1/29/24 2:14 PM 1/30/24 6:29 AM
- Ref No. 24-03513757 mail 1/29/24 1:55 PM 1/29/24 2:30 PM

11:27 AM Ref No. 24-03536551 CRIME 1/10/24 "CA-0103 Accus. to the COURT to whom IT MAY CONCERN OPERATIONS/PROCEDURE W/ COURT OF APPEALS FOR 4th Circuit Rule 21(a) Petition for Writ of Mandamus pursuant to 18 USC 3771 Crime Victim Rights Supremacy Clause VII sec (2) Heed to the courts due course and proceed w/ Law 17th Amendment Before FILING such a petition the petitioner must NOTIFY THE COURT OF APPEALS that such a PETITION WILL BE FILED, AND MUST ARRANGE for IMMEDIATE SERVICE of THE PETITION on the relevant parties such NOTIFICATIONS must be by TELEPHONE call to THE OFFICE of THE CLERK during normal office hours (804)-96-2204 This authority is for scheduling such mandatory phone call according to Supp Appx. Clearance with the institution must be done 28 USC 517c. Trial at COURT. RESPECTFULLY SUBMITTED STATE 6th Amendment PROTECT PERSONA.

RETRIBUTIVE DATE 6/17/24 3:34 PM AUTHOR (02758) "NOTIFIED THE WARDEN THAT YOU ARE ASKING FOR A LEGAL CALL IN THE FUTURE WITH YOUR OWN LIT."

REF NO 24-03545753 PROCEEDINGS 6/18/24 8:05 AM

WARDEN BECKWITH, NEXUS LEGAL 24-03536551

6-17-24 3:34 AM AUTHOR 02758 SPOKE TO YOU ON COURT DAY 6-15-24 CONCERNING CARLOS ABRAHIM BY YOUR AUTHORITY WAS GIVEN INSTRUCTIONS TO SEND THE REQUEST FOR COURT ADVISE THE COSTS FOR ME INTO CRIMINAL VICTIM RIGHTS ACT (CVR) 1771. Wit of Mackinac. Fee on Welfare in Circuit Court of Appeals rule 21 extraordinary writ (CVR) 1771 CURA. Wt. COURT OF APPEALS 4th DISTRICT 1100 COMMERCE STREET RICHMOND VA 23219 PHONE NO. (804)-966-2700 (Clerk of US COURT OF APPEALS (Part from name) truly appreciate your assistance in this matter. THIS extraordinary circumstance bearing GOOD (CASE SITUATION) IS COMPLETED BY THE DEPARTMENT OF JUSTICE (Habeas Corpus) 28 U.S.C. 2254 Thank you again for your help

6/19/24 5:20 AM Author (02758)

How long who are you asking to call?

REF NO. 24-03549455 LEGAL 6/20/24 12:08 PM "Warden Beckwith 6/19/24 3:30 PM LEGAL 24-03547654 (02758) Author NEXUS AUTHORIZATION OF ATTORNEY OVERSEER ANNE CAR FOR HABEAS CORPUS PROCEDURE US COURT OF APPEALS 4th DISTRICT 1100 COMMERCE STREET, RICHMOND VA. WHO ARE YOU ASKING TO CALL? LISTEN PLEASE BE ATTENTIVE I DO NOT KNOW THE ACTUAL CLERK NAME OF THE US COURT OF APPEALS 4th CIRCUIT THE CLERK WILL BE REVEALED. HE OR SHE WILL CONDUCT THE NECESSARY PROCEDURE SUPRA THE CLERK HAS AUTHORITY UNDER STATUTE TO MAKE SURE THAT IDENTITIVE CONTENT OF LAW WILL BE GIVEN MYSELF BEING "A VICTIM" THE DEPARTMENT OF JUSTICE WHO BE INVOLVE PEOPLE COULD GET INCARCERATED. THAT IS VERY IMPORTANT INFORMATION CARLOS ABRAHIM TO THE COURT. 18 U.S.C. 371 could be given. THE LANGUAGE OF STATUTE (CVR) 1771 TERMINATION FOR VIOLATION OF OUR REQUEST PLEASE WITH DEFERENCE. SEE THAT THAT PROCEDURE WILL HAPPEN. AGAIN YOU CAN CONFIRM THE CLERK NAME WITH THE JUDGE PHONE NUMBER MOST LIKELY THEY WANT PROVIDE SUCH INFORMATION DUE TO THE GRAVITY OF THE CIRCUMSTANCE. THANK YOU FOR YOUR TIME. IF BOWEN THE CLERK OF COURT II DONT KNOW THE NAME PLEASE FORWARD TO LEGAL ONCE MORE.

REF NO. 24-03564160 LEGAL 7/2/24 8:24 AM

RESPONSE 7/3/24 9:30 AM Author (02758)

REF NO 24-03566072 LEGAL 7/4/24 10:42 AM

7/5/24 8:14 PM Author (02758)

You will need to address your concern at the individual level

REF NO. 24-03577797

VIOLATION 7/11/24 11:29 AM
LEGAL

7/15/24 1:51 PM Author (06967)
Court Appearance this has been addressed and should not happen again. Warden Beckwith
Deborah Jean

REF NO 24-03596326

MAIL 7/30/24 12:17 PM

8/13/24 8:00 PM?

REF NO. 24-03596998

MAIL 7/30/24 8:57 PM

8/13/24 3:00 PM

REF NO. 24-03546326

MAIL 7/30/24 12:17 PM

8/13/24 3:00 PM

The Paramount is "FACTUAL RECORD" FOR "HANDWRITTEN PETITION" PROCEDURE, though "ACTION REQUESTED STEP 1 GRIEVANCE Remedy WAS PARTIALLY DENIED (CIVIL RIGHTS structure 26(C)) WILL BE GRANTED, HINDERANCE due to essential has been removed.

Ubi aliquid impeditur propter unum, eo remota, tollitur impedimentum. When anything is impeded by reason of one thing, when that is removed the impediment is removed.

An extraordinary Remedy MUST HAVE ITS RECOURSE Ubi cessat remedium ordinarium, ibi decurrit ad extraordinarium When a common remedy ceases to be of service, recourse is had to an extraordinary one

SEE Appendix Kfflowitz, MD

It is Genuine Issue of material fact Appalling Board VIOLATION exists pulsating
manufacture of state liberty RIGHT interest. Use Process CA 0103 JUDGE policy denial of LEADS
Postage to POLICY APPENDIX listed U.S. District Court for "HANDWRITTEN WRITTEN" led into
Conspiracy to commit Moral TURPITUDE Barter Business Tech employee Wallace Corr. Inst
Extraordinary PRELIMINARY Injunction Summary JUDGMENT MUST BE GRANTED, under the
GOVERNING LAW.

Impossible, Improbable that an Appellant can have PLENARY Action Request Step 2 Grievance Authority Redress CERTIFIED By the way CONTRACT, BOND, COVENANT IN ABSOLUTE AGREEMENT... WITH "MODERATION." Appellee by title J.C. official GENERAL COUNSEL URANCE Form Worker Correctional Institution employees aided assisted abided by Governing Law Federal Congressional state of J.C. Statutory constitutional Due course. On June 17, 2021, Before Associate Warden Long, Winkley, and Warden Beckwith in person direct TANGIBLE PRESENCE. The Assistance from Essential beyond substantial evidence "Kiosk RECORD Reference," to obtain such CIRCUMV. Is CELEBRATING EX ORTURE IN PRELIMINARY INJUNCTION 18 USC § 3771 Rule 21(c) WRIT of MANDAMUS AGREEMENT. *Epini v. Me* Verba WE MUST SEND GENERAL COUNSEL This Request... The Appellant In title for FACILITY REASON LOGIC Reports Warden Beckwith asked... "We MUST SEND GENERAL COUNSEL THIS REQUEST." A PHONE CALL TO THE U.S. COURT OF APPEALS Clerk for case, MANAGER alignment assistance. The Appellant at the time was preparing according to LAW if necessary packing in U.S. District Court Alexandria VA. for his Writ of Mandamus CIVIL petition Criminal Victim Rights Act. The J.C. GENERAL COUNSEL GAVE THE AGREEMENT, CONTRACT, BOND, COVENANT ABSOLUTE GUARANTEE by approving transmitting warrants for such LEGAL ARTICLE 17 (2) Supremacy CLAUSE PROCEEDURE and NOT COMMITTING 516-9-340 J.C. obstruction offense NOT VIOLATING CA 0103 Access to the courts Department of correction J.C. policy. NOT BREACHING PS 10.08 mail POSTAGE. The APPELLANT WITHIN GENERAL COUNSEL LEDGER Knows Grievant NOT APPELLANT SPEAKS NO PRUDERY. PURSUANT IS NOT THE 1st Amendment right liberty of FAITH by the Appellant. NOTING BY the Grievant Actual Damage state liberty Right Tortman. It a made up waste mockery of the courts TIME. IF JUST AS ALREADY UPON STEP 1 GRIEVANCE Response. Warden Beckwith on FACILITY UPON step 2 Grievance IRRESPONSIBLE DIRECTOR OFFICE Response... FAILURE. Just If the GENERAL COUNSEL DECIDES THAT the Warden OFFICE DID NOT GET THEIR CONSENT. THAT FULFILLING GENUINE MATERIAL FACT ESSENTIAL PROOF FOR PRELIMINARY

INJUNCTION EVIDENCE. HAS NOT MADE THE Circuit Step 1 petition and modified
 Supplement official capacity CA 01.12, 10.2, 10.5 monetary DAMAGES ADMINISTRATIVE LAW
 AUTHORITY PLENARY The General Council Representative or Just Pleasants can see to it
 that the inmate VICTIM Circuit Appellant be released and add him to the staff to conduct
 TRUE legal lawful procedure; on their behalf. For their ACCOMPLICE, the court CANNOT
 comply, with ... LEGAL SUBSTANTIVE TREASONERY SEE Appendix Affidavit NOS 1 and 2

There is NO WAY, CRITICAL Decade COGNITIVE Thinking, or Bar member professing to be
 Sui Juris. Corpora motif as Legal Entity GENERAL COUNCIL CAN SIDE with October 30, 2024
 "Perdition". Access TO THE AUTHORITY ACTUALLY KNOWN COVENANT "WE ARE WITH YOU",
 US COURT OF APPEALS. HANDWRITTEN or Type IT DOES NOT MATTER. PETITION. The Paris Paris
 Treaty, MUST NOT GIVE CONTRADICTORY MANIFESTATION by "Notice of Appeal" Language "FALLACY"
 NO. 3 PERFECT To defend mailroom Furman, Business sector Barber, personal capacity Warden
 Beckwith, official capacity RESPONSIBLE DIRECTOR OFFICE operation. with yet we have
 Record EVIDENCE of CONSENT. But... we must also see... ARTIFICE. SEE Appendix
 Affidavit NO 1 and NO. 2 AGAIN Remember on October 30, 2024, Kinder Barber [document
 of case] after victim, Petitioner, Circuit, Appellant quoted 18 USC § 1701 (Especially since P.O.P.
 ATGC visit Col. J.C. Mc Kurey) "I scanned" Initial FIRST HAND WRITTEN pages to "General Council".
 See Appendix Affidavit NO. 2 An unknown Phantom ACCOMPLICE gave consent to VIOLATE
 Access to the courts when time lapse for scheme throughout Business sector Barber with
 Whimwell, Corporal Beckert Handwritten NOTE after phone call to or from Barber League to
 516-17-410 J. Lucade after 440 days and counting worth of Evidence now incontrovertible. DEFICIT SEE
 Appendix Affidavit NO. 2

Genuine material fact CLAIM, BOSTERLOW NO TIME This case bring face sub judice
 MUST BE SETTLED OUTSIDE of the Bound v. Smith 430 U.S. 812, 817, 87 L.H. 2d 72 (1978)
 PRECEDENT DEMANDS. There is NO SCANTILLA of DEFENSE for S.C. GENERAL COUNCIL THE ALLY in
 FACTUAL Bona fide CONTEXT. The AM track locomotive of Justice has NOT DEPARTED FACTUAL mailroom
 7

personal Mrs. Furman, Business sector Barber, personal capacity Warden Beckwith,
 Official capacity RESPONSIBLE DIRECTOR OFFICE OPERATION, CANNOT Respond Grievance No.
 WRCT-0150-24 Stamped 11/4/24 Action Requested FROM LIAISON ALL SCIENTISTS WERE SOON
 ADM they unprofessional 020. NEGLIGENT in carrying out professionalism 040, Willful
 Intentional Improper work in disregard 120. FAILED to cooperate with law/policy violating
 superior from a \$ 3,00 account few dollars short to can't use 10-14 debit form to car, the car
 because HANDWRITTEN Petition criminal above equals L I A B I L I T Y

The Step 1 Grievance for the Grievant has Always BEEN a CERTIFICATE. TENABLE COURT
 Administrative Debt instrument Gift. Malicious Furman Foreseeability compensatory \$ 5,000.00 positive
 \$1250.00 Fort Foster Business sector Barber compensatory \$ 10,000.00 positive \$ 5,000.00. Due to reasonable
 S.C. Agent employment periodic payments every three months Initial \$ 1,000.00 after \$ 500.00
 until SOLVENT FINALITY. Personal capacity Warden Beckwith Initial \$ 3,000.00 after \$ 500.00 in the

Upon South Carolina Department of Correction INMATE GRIEVANCE form STEP 2 11/26/24
 filed Stamped unknown non legible signature Deputy Director office of Operation OFFICIAL CAPACITY
 DUE to LAPPER cognitive elementary guilt upon subemployee's Essential Evidence SEE Appendix
 Affidavit Land 2. Director office DID NOT glance at the Adjudicative Electronic, manual Record
 for JUSTICE FORESEEABLE. COMPENSATION \$ 100,000.00 Positive \$ 25,000.00 Initial aggregate

The Grievant VICTIM mother Rodney BURGESS had to send the legal mail W. # 107806
 paid \$ 11.40 priority mail with tracking # 9505 5117 6028 4335 864450. To the Appendix
 listed GA 01.03 W. District Court Entity. Director office DID NOT EVEN CALL W. Court of
 APPEALS to confirm "HANDWRITTEN PETITION" APPLICATION Supervisor Care manager Tony Webb
 phone no. (804)-916-2200 upon Step 2 Grievance with quoted 18 W.C. 5(2)(c), (1702) obstruction of mail
 globally. Warden Beckwith knowledge Apprehend with care his responsibility as the institutional
 Authority collecting overall mental state health, Anguish Street J.C. case 515-18-22(b) Debbanck
 Indifference. Also for family being victimize supra foreseeable compensatory \$ 25,000.00 positive
 probandi met.

CONCLUSION

When Samuel Williston spoke ledgered an "Treatise on the Law of CONTRACTS". He DID NOT ENVISION a CORPORATION who has Agents employees under POLICY vow. To NOT "perform" the Elementary basis of PARAMOUNT legal access to the courts. To have knowledge of an Administrative Federal VI Amendment Article 1 & 2 J.C. constitution Retition criminal VICTIM RIGHTS ACT procedure. The entire Warden Watersee Staff Long, Wackley, and Beckwith received Clearance from the Attorney Bar members GENERAL COUNSEL who CANNOT EVEN PATHOM a Defense because by RECORD ESSENTIALLY... Their part of the Appellants Legal staff. Civil Rule 65 preliminary Injunction is Extrajudicial, these facts law properly executed are exceptional. To prevent POSTAGE "HANDWRITTEN PETITION" wound, of Any Missouri Agent from repeating such caricature nefarious violation, punitive Damages... MUST take place mailman Furman, and Business/ Financial Sector Barber supra official capacity Irresponsible Legality Director office operations. Circuit has concrete his case to the only Salem Redress. Appellant is Circuit state liberty RIGHT has been ANNHILATED... INJUNCTION in FAVOR, for SCOC CONTRACT obligation DEMANDS IT. JUSTICE. Due Process will NOT BE DENIED AGAIN.

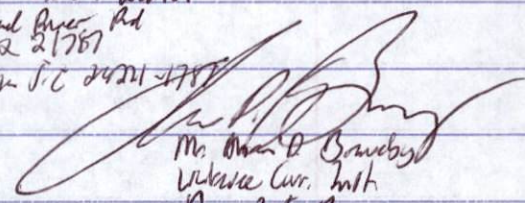
Proof of Service

I Abram D. Brueby certify that I have served "Motion for preliminary Injunction S.C. Civil Rule 65/ Summary Judgment S.C. Civil Rule 56 A.C. Special Appeals Rule 60 63". To infra by Republishing a copy of it in the United States mail, postage pre paid on 2/25/25

Administrative Law Court
1205 Resurrection Street
Suite 204 Columbia SC 29201

and

Office of General Counsel
4400 Bond Street Rd
P.O. Box 21767
Columbia S.C. 29201-1767



Mr. Abram D. Brueby
Vikawa Cur. Intk
Room 2-T-B
Respect J.C. 24128

General Counsel Respondent in *Alto Ego Makin Jide*, CANNOT PRECLUDE Preliminary Injunction, from being Enforced. General Counsel Respondent CANNOT OBTAIN Abstract Ruling or Doppelganger Adversary having NO malice, Trick, or mitigate Reverse Judgment in Summary with personal Knowledge. Firsthand Affidavit, subjecting oneself as denominator (beneath) under penalty of perjury. Knowledge is present. [SEE General Counsel Record Affidavit NO. 1 and NO. 2] but if any confirms such step by step. Actual Knowledge to Defend TORT from Exordium Policy / Law criminal offense Gross Wanton Denial Access to the courts to the other without *qua potestas* Affecting authoritative officials. Culpable will be the film due to violation of oath CONTRACT obligation, NO Genuine issue of material fact can prevent Summary Judgment Rule 56(c) Axiom for the Grievant Appellant, victim see Beyah v. Coughlin WCA^{2nd} circuit 789 F.2d 986 May 2, 1986 SEE Appendix Affidavit NO. 1 and NO. 2 with Attachments 1-10

There will be NO Special Appeals ALC Rule 60, Reply BRIEF IF GENERAL COUNSEL DECIDES TO COMMIT PERJURY 28 USC § 1746 I.C. Code § 16-9-10. Substantive RIGHTS of the Appellant have been PREJUDICED because the finding, conclusion and decision is in

violation of Constitutional and statutory provisions
 In excess of the statutory authority of the agency
 made upon unlawful procedure
 affected by other error of Law
 Clearly erroneous in VIEW of the reliable, probative, and
 substantial evidence on the whole Record.

Cupicious and characterized by abuse of discretion and clearly unwarranted exercise of discretion.

ADMINISTRATIVE LAW COURT

SA RULE 60 (c)

A P P E N D I X

LENSKI

WRCT 0150-24

Entry within COURT LEDGER ESSENTIAL EVIDENCE Affidavits under penalty of perjury 28 W.C.S. 1246 personal knowledge Attachments (1-10) For Preliminary Jurisdiction/Summary Judgment Article 1 & 3 N.C. Constitution 14th Amendment U.S. Constitution Due Course and Process of Law

AFFIDAVIT

ATTACHMENTS

No. 1 and No. 2

(1 - 10)

Abram D. Browne ²⁸⁴²⁸⁷
Watree Ct Room 2-5B Side
Highway 261 P.O. Box 189
Ramblet S.C. 29128-0189

State of South Carolina

ADMINISTRATIVE LAW COURT
CASE NO. WRCL 0150-24

Mr. Abram D. Bracey

Appellant

v.

AFFIDAVIT

NO.

1

S.C. Department of Corrections

Respondent

I Mr. Abram D. Bracey declare under the penalty of perjury, I am the Appellant in this hereto captioned case with personal knowledge of the facts, and being competent to testify. Forthwith this affidavit to support my motion for preliminary Injunction / Summary Judgment, **INVESTIGATIVE LIABILITY KWIK REFERENCE EVIDENCE** Record. Manning Pre Release Ref No. 23-03324007 mail 4/30/23 6:55 PM, 12/17/23 (020472) Release 12:28 PM 14/22/24 4:50 AM

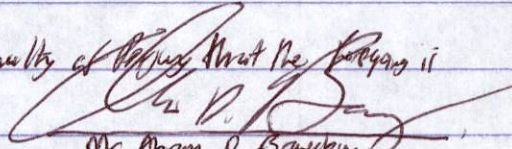
- Ref No 23-03346868 mail 12/29/23 12:06 PM
- Ref No 24-03355674 mail 1/3/24 9:16 AM 1/4/24 11:05 AM
- Ref No. 24-03381612 mail 1/20/24 9:42 AM 1/26/24 (066684)
- Ref No. 24-03380391 mail 1/24/24 10:10 PM 1/25/24 9:41 AM
- Ref No. 24-03410204 mail 2/20/24 9:08 AM 2/21/24 9:41 AM
- Ref No. 24-03415754 mail 2/26/24 8:02 AM 2/27/24 1:36 PM
- Ref No. 24-03413296 mail 2/25/24 7:06 AM 2/27/24 1:35 PM
- Ref No. 24-03523659 mail 5/24/24 2:18 PM 5/30/24 10:24 AM
- Ref No. 24-03513757 mail 5/20/24 1:55 PM 5/21/24 2:30 PM
- Ref No. 24-03536551 LEGAL 6/10/24 11:27 AM 6/17/24 3:34 PM
- Ref No. 24-03548753 PROGRAMS 6/18/24 8:55 AM
- Ref No. 24-03542654 LEGAL 6/19/24 9:59 AM 6/19/24 3:20 PM
- Ref No. 24-03549455 LEGAL 6/20/24 12:08 PM
- Ref No. 24-03564960 LEGAL 7/2/24 8:24 PM 7/3/24 9:30 AM Author (027088)
- Ref No. 24-03566072 LEGAL 7/4/24 10:42 AM 7/7/24 8:14 PM Author (027088)
- Ref No. 24-03577797 writatio. 7/17/24 11:29 AM 7/17/24 1:30 PM Author (064963)
- Ref No. 24-03596326 LEGAL 7/30/24 12:17 PM 8/13/24 3:00 PM
- Ref No. 24-03596495 MAIL 7/30/24 8:37 PM 8/13/24 3:00 PM
- Ref No. 24-03596326 MAIL 7/30/24 12:17 PM 8/13/24 3:00 PM

INOPERABLE ELECTRONIC KWIK REQUEST UNTIL 10/30/24 CLEAVANCE FOR GROUND WATSON NEGLIGENCE GENERAL ACCESS TO THE COURT

This EVIDENCE MANIFESTS COOPERATION ALLIANCE WATSON CORR WATSON OFFICE ASSOCIATED LONG, WACHLEY, and SUPERVISOR BELKWITH, Lt Dingle, Captain Davis GENERAL COUNSEL as Witness. IF WCL 83771 Criminal victim Rights Act CONTRACT TO EXECUTE SOPs Policy GAD.03 and P.10.08 Due Process for the behalf of victim Abram D. Bracey. Preliminary Injunction Rule 65 / Summary Judgment Rule 76 MUST BE ENFORCED

Pursuant to 24 WCL 8106, I declare under the penalty of perjury that the foregoing is TRUE

3/20/25
DATE


Mr. Abram D. Bracey
Watson Corr. Inst. Room 2 Room 5
8700 Statefarm Rd. P.O. Box 109
Rembert S.C. 29108

STATE of South Carolina

ADMINISTRATIVE LAW COURT
CASE NO. WRC# 0180-24

Mr. Abram D. Bravoboy
Appellant

v

S.C. Department of Corrections
Respondent

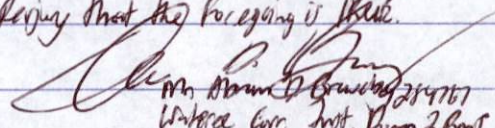
AFFIDAVIT
NO. 2

I Mr. Abram D. Bravoboy declare under the penalty of perjury I am the Appellant in this hereto captioned case, with personal knowledge of the facts and being competent to testify, forthwith this affidavit to support my motion for preliminary injunction/summary Judgment.

1) After Hainous Act Conspiracy mailroom Furman Business/financial sector Barber quote CANNOT forward Postage mail due to "HANDWRITTEN PETITION" the under duress victim gave Demanded first pages of petition to SCDC for another Galaxy reach thinking for already 11/30/23 - present consistent GENERAL COUNSEL LAWYER OFFICE 18 WCS77116 USA procedure on October 30, 2024. Egregious Denial Access to the courts. Already spoken with Supervisor Tony Webb October 11, 2024 (804)-916-2242 U.S. Court of Appeals order to the U.S. District Court Madam Judge Rehn. Due to NO Access to electronic Waste REQUEST to forward to Warden Beckwith Immediately, the victim did a manual 19-11 SCDC Form Request to staff Asking for another phone call due to Denial of POSTAGE via mail Reason CANNOT SEND Rehn because it's HANDWRITTEN U.S. Court of Appeals order was shown to responsible superior Mr. Barber Business Denied 0A0103 Access to the courts and PS 10.08 11.1 "AT THE TOP RIGHT HAND CORNER THE VERY CERTIFIED OFFICIAL RECEIVED GENERAL COUNSEL NOVEMBER 6, 2024 STAMP. PRELIMINARY INJUNCTION MUST BE DONE IN APPELLANT'S FAVOR BEFORE" (attached 1-5)

2) On July 16, 2024 after numerous interactions by mailroom Furman, for some "Rehn's Indifference" discriminatory reason, NO stamps of the legal mail, late getting legal mail in reasonable time without holiday excuse. Calling Business sector Barber for elementary copying of stamped courtroom documents. The victim petition had enough he sent to the U.S. Court of Appeals 4th circuit 1100 E. Main Street Richmond V.A. 23219 concerning his legal procedure NOTICE to Appeal (forma paperis) application "Honorable Clerk The VICTIM After receiving "HINDERANCE" from mailroom Mr. Furman. The victim in month of July same month could not access his electronic WASTE Request system on his Assigned Tablet Mr. Barber Business Sector Authority has that particular function. On August 19, 2024 Stamped Right HAND CORNER RECEIVED August 22, 2024. Warden Correctional Institutional Mailroom 19-11 manual request explaining the help needed after already spoken in person to Mr. Barber concerning the malfunction priority for legal work. 8/22/24 Barber gave a puzzling quote This NEEDS TO BE SENT THROUGH THE "KIOSK" TO LTE. Tablet/Printer Troubled that I include the MDC" not the IMEL or IN. On August 30, 2024 stamped September 11, 2024, the victim sent again a request to Barber for electronic Waste Request access. On 9/11/24 Barber quote I do NOT UNDERSTAND what you are asking for. Please Record Your Request to better explain your question structure. Only to have access one grievance 10/3/24 was submitted about best Denial Access to the courts Attachments 6-9

3) On October 30, 2024, immediate After Gross Warden Denial of Access to the courts from Barber again because of "HAND WRITTEN" documents. The victim sent Directly to General Counsel his complaint via 19-11 Request Form with CERTIFIED RIGHT HAND CORNER RECEIVED November 6, 2024 GENERAL COUNSEL I REPEAT GENERAL COUNSEL PRELIMINARY INJUNCTION NO OFFENSE Civil Rule 65 Judgment GUARANTEED. FOR THE Appellant Grievant State hereby Right violation victim Warden Staff Captain Davis as witness. Two documents that got scanned for General Counsel pre-legal clearance for Postage mailing on 11/30/24. LIABILITY PRELUDE see page 8 of memo/motion Attachments 10

pursuant to 27 WCS 1746, I declare under the penalty of perjury that the foregoing is true.
2/27/25
DATE

Mr. Abram D. Bravoboy 284767
Warden Cor. Inst. Room 2 Room
State State Form Rd. P.O. Box 189
Rambert S.C. 29108

INMATE GRIEVANCE FORM

INMATE COPY

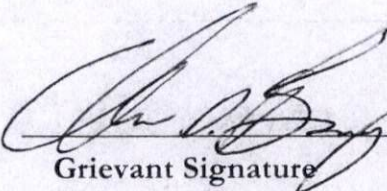
STEP 1

INMATE NAME: <u>Mr. Abram D. Barbey</u>	RECEIVED NOV 04 2024	OFFICE USE ONLY	
SCDC NUMBER: <u>284787</u>		Grievance No. <u>WRT-0150-24</u>	
INSTITUTION: <u>Waterloo</u>		Code: General <u>GP/ML</u>	
HOUSING UNIT: <u>Dorm-2A</u>		Policy _____	
WORK ASSIGNMENT: <u>TA</u>		Disc. Hear. _____	
	BY: <u>[Signature]</u>	Class. _____	
		PREA _____	
		Date Received <u>11-4-24</u>	
		IGC Initials <u>ES</u>	

STATEMENT OF GRIEVANCE (Indicate the date of incident, and if the grievance is a challenge to SCDC Policy, specify which policy. Include supporting documentation and attach answered RTSM or Kiosk reference number.)

CA 01.12, 13.3 necessary info,

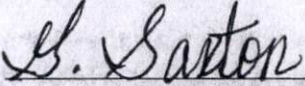
The Grievant avers, on 10/29/24 Mr. Furman mailroom personnel was not CLEAR concerning SCDC policy "LEGAL" correspondence to "EMERGENCY" U.S. District Court. According to Furman there was a need for Mr. Barbey "Business" to Authorize FELLOW Inmate Legal mail understanding Due process postage. 10/30/24 Barbey DID NOT approve of Legal IMPERATIVE Federal COURT ORDER AUTHORIZATION to receive postage, due to HANNOVARTON Petition. Involving violation of FEDERAL STATE liberty right and existing policy CA 01.03, 16.1, PR 10.08, 11.1, 11.1.1. Denying the mental anguish, emotional distress, proximate harm under duress victim, Grievant, Article 1824 J.C. constitution 16 USC 3771 criminal victim rights Access to the "COURTS" Mailing MUST BE PROMPT DUE 2 COURT ORDER, 14-11 mand request NOT Attached, 10/30/24.

 10/30/24
Grievant Signature Date

ACTION REQUESTED: Both are liable. Due to CONSIDERATIONS after displaying U.S. Court of Appeals ORDER to Mr. Barbey with ONLY ONE WAY for POSTAGE mail Transfer. Quoted Federal offense 18 USC 3170 Grievant NEED IMMEDIATE INTERVENTION for mailing CLARIFICATION and THAT this does not happen again. VIOLATION CRYSTALLINE CA, 01.12, 10.2, 10.5. NONE ANY DAMAGES for BOTH JORRA THEFT/FEAR/OPPRESSION/ NEGLIGENCE, 000, 5 THRU 10000 FURMAN, 10 THRU 20000 \$ 10,000 BARBEY NEED TO SEND LEGAL MAIL TO COURT.

ACTION TAKEN BY IGC: PROCESSED UNPROCESSED OTHER

THIS GRIEVANCE HAS BEEN PROCESSED. PLEASE SEE THE WARDEN'S DECISION (DECISION) ON THE REVERSE SIDE.

 11-25-2024
IGC Signature Date

(CONTINUE ON REVERSE SIDE)

RECEIVED

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

Due by: 11-30-2024

INMATE COPY

DEC 03 2024

STEP 2

Office Use Only

INMATE GRIEVANCE

INMATE NAME: Abram P. Brandy
SCDC NUMBER: 20777
INSTITUTION: Waterloo ✓
HOUSING UNIT: Perm 2
WORK ASSIGNMENT: TA

RECEIVED
NOV 20 2024
BY: [Signature]

Grievance No. WRC1-0150-24
Code: General GPI ML
Policy _____
Disc. Hear. _____
Class _____
PREA _____
Date Received: 12-2-24
IGC Initials: BS
Date Received: 12-6-24
IGA Initials: CB

INMATE'S REASON FOR APPEAL (state specific dissatisfaction): Spurious unauthorized Motion Denied, State Writby Essential right "Access to the courts" GA 01.03 16.1 and PS 10.08 11.1, 11.2. Mr. Barber Business and Mailroom personnel Mr. Furman Barber quoted due to "HANDWRITTEN" documents the Petition to U.S. District court cannot be mailed out. GA 01.03 16.1, PS 10.08 11.1, 11.1, 10-14 Form was to be used to cover the cost. "DEBIT" Barber (due to Dollars) received and scanned ORDER from U.S. Court of Appeals 10/30/24. Sent to General Counsel. General Counsel received documents 10/30/24. Could not mail U.S. District court Petition, Conspiracy, 1971 request sent to Warden Beckwith witness due to preparation for procedure 18 USC 3377 10/15/24 case manager Tony Webb (804)-710-2700. Kiosk Request 09/26/24 used manual requests to Business sector Barber twice for assistance 8/19/24, RECEIVED 8/22/24, 8/30/24. RECEIVED September 11, 2024 10/30/24 quoted commit offenses 18 USC 3701, 1702.

Grievant Signature [Signature] Date 11/25/24

RESPONSIBLE OFFICIAL'S DECISION AND REASON:

I have reviewed your concern. You state that you were not allowed to mail handwritten documents to the U.S. District Court and a 10-14 Debit Form should be used to send legal mail if you do not have enough money in your E H Cooper Account. You are requesting immediate intervention and be allowed to mail your legal documents. The Warden responded to you on 11/25/24. A review of your concern indicates that you were not allowed to mail out the legal mail, not because you didn't have enough money, but because you wanted to mail it Certified. Pursuant to SCDC Policy GA-01.03 Inmate Access to the Courts "Subject to the requirements of SCDC Policy PS-10.08, Inmate Correspondence Privileges, "An inmate will be permitted to send an unlimited amount of legal mail regardless of his/her indigent status, E. H. Cooper Trust Account current cash balance, or canteen spending limit." Policy also states, "Inmate will be permitted to send certified legal mail for summons or complaints to the Attorney General (only) in compliance with the S. C. State Court Rules." Your mail would have been denied being mailed certified if it was not being sent to the Attorney General not because it was handwritten." You have not shown that SCDC Staff have failed to perform their job duties properly.

Therefore, your grievance is resolved.

You may appeal this decision under the South Carolina Administrative Procedures Act to the South Carolina Administrative Law Court. In order to appeal, you must complete the attached Notice of Appeal Form (Form) and submit it as instructed on the Form within 30 days of receipt.

Responsible Official Signature [Signature] Date 11/27/24

The decision rendered by the responsible official exhausts the appeal process of the Inmate Grievance Procedure. I hereby acknowledge receipt of the official's response and understand this is the Agency's final response to this matter.

Grievant Signature [Signature] Date 1-9-25

IGC Signature [Signature] Date 1-9-2025

STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT

Mr. Abram D. Braudney,)
Appellant,)
vs.)
South Carolina Department of Corrections.)
Respondent.)

DOCKET NO. -ALJ-04-

GRIEVANCE NO: WRC1-0150-24

NOTICE OF APPEAL

Notice is hereby given that Mr Abram D Braudney appeals the final decision of the South Carolina Department of Corrections dated 12/18/24 and received on 1/9/25, a copy of which is attached. In accordance with Rule 59(B) of the Rules of Procedure for the South Carolina Administrative Law Court (SCALC Rules) please provide a brief factual basis for each expressly and specifically asserted constitutional violation:

1st Fallacy Defense Warden Beckwith and fallacy defense IRRESPONSIBLE officials Deputy Director of operations. Now a 3rd Fallacy Antonym will make a mockery of the Administrative Law court. From 12/5/23 continues 2025. The late Victim Petitioner now Grievant Appellant has been under 18 USC § 3771 (USA Article 2524 J.C. constitution procedure. With relative check numbers five numbers Examinum 5/21/24 minimum 11/1/24 and 4th Circuit Cal. 1/22/25 SC 4th Circuit Alexandria VA and UT Court of Appeals 4th Circuit Richmond VA. Access to the COURT CA 01/03 VIOLATIONS. Even Admitted by Warden Beckwith, and the OFFICE OF GENERAL COUNSEL. Concerning Congressional Statutory 18 USC § 3771 a. Authority Writ of Mandamus requisite for phone call. See step 2 for phone NO. To have the AUCACITY "You CANNOT RECEIVE POSTAGE because the Petition is "HANDWRITTEN." 10/30/24. Scanned by Business sector Mr. Barber to send to GENERAL COUNSEL to get NO POSTAGE. It constitutional caricature refusal violation

id of
but take
interest right
in
mediate
money
return
of Counsel
Kernal
ence.

Abram D Braudney
Appellant's Name

[Signature]
Signed

Waterloo CZ Poma 2-5A Side Highway 201 184 P.O. Box
Mailing Address

1/12/25
Dated

Rambert SC 29128-0189
City, State, Zip Code

CERTIFICATE OF SERVICE

I hereby certify that I, Abram Braudney (your name), on the 12th day of January, 2025, in Rambert (city), South Carolina, served a copy of the foregoing Notice of Appeal on all parties to this matter by depositing the same in the United States Mail, postage paid, and addressed as follows:

Name of person/Agency served: J.C. Administrative Law Court

Address: 1205 Plattekn street suite 224

City, State, Zip Code: Columbia S.C. 29201

Abram D. Braudney
Print your name

[Signature]
Sign your name

(See reverse side for instructions)

GMS

Clerk office

U.S. COURT OF APPEALS
4th Circuit
1100 E. MAIN Street
Richmond V.A. 23214

July 16th 2024

Abram D. Braveby
Waterloo Corr. Inst. 29407
Dorm-2
8000 State Farm Rd.
P.O. Box 184
Ramblet SC 29428

RE: VICTIM (CVRA) 18 USC 3771 Mandamus Appeal "Extraordinary" procedure/Forma Pauperis
Attachments 1-17/Notice to Appeal/Notice of Question's constitutionality/Motion to Enlarge/
Extended time.

Honorable Clerk,

The VICTIM After receiving hindrance from malice Mrs. Victoria, US District court Rule
59(c) dismissal 7/2/24, 7/11/24 on ledger, actual reception on 7/15/24 probable 18 USC 1701, 1702 if this
week 7/17/24 sent legal material does not arrive on time. In the MOST Absolute, Rare, Heinous
Hebephrenous, usurpation of power, circumstance of elementary Legal Law. Devoid Adjudicated a
VICTIM for Heck clearance Damages 1/6/12 Rule 58 Entry, Richland county 5th Judicial Circuit
Court of common pleas. After proceeding Actual fraudulent telephone misconduct March
4, 2024 final Dismissal. That must in Forma Pauperis be transferred to Fed claims court for liquidation
of damages 28 USC 2513. Yarnes Klein former Chief Judge Administrative L Casey Manning, J.C. 5th Circuit
Court of common pleas. The victim remains after October 31, 2023, Harris v Champion, Barber v Wingo
excessive 1,665 days Direct appellate Denial General Sessions Richland county, Jocelyn Newman at year
obstruction sought 28 USC 2254 unconditional Release 12/5/23, Federal Habeas manual
CVRA motion 1/5/24 criminal victim rights that are guaranteed for the Kidnapped 18 USC 1201, physical
sexual abuse worst therapy victim. Justice Department reached civil settlement with victim ADUSK
by Lawrence Nasser 2024 WL 1740604. Has excluded essential evidence for entry into Honorable Forum
Notice for Appeal (CVRA) Rule 21 Exceptional procedure before scheduling via phone the ACTUAL
Mandamus petition NOTICE QUESTION of constitutionality that your office must seize J.C.
Attorney General and U.S. Attorney General for Presentation of evidence 18 USC 2403 which the
Appellate court can respond in different ways, Civ Rule 5.1. The dismissals of U.S. District courts
4th Circuit Greenville S.C. Alexandria V.A. 1/19/24 4/30/24 Rule 59(c) 7/2/24. Give this Tribunal the
authority in CVRA mandamus to Execute Just Address of freedom, Forma Pauperis Application
in Extraordinary has attachments 1-17 for explanation of possibly not having the
finance to pay the initial \$600 due to the conspiracy to EXTORT, kidnap with Lower State of SC.
Richland county Court of common pleas 5th Circuit determination T.C. Supreme Court confirmation that
the petition Among D. Brantley is a victim. With U.S. Attorney offices habeas due to
murder according to 18 USC (3771) (CVRA) (F) (A) (2) (A) - (D). In its continuation, please make sure
that every notice Application Federal receives due course and process of law, with
Amendment. Thank you

18

RECEIVED

2024 JUL 19 A 11:58

U.S. COURT OF APPEALS
FOURTH CIRCUIT

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REQUEST TO STAFF MEMBER

RECEIVED

TO: STAFF NAME: <i>Barber</i> STAFF TITLE: <i>Business ed</i>		DATE: <i>8/19/24</i> AUG 22 2024
INMATE NAME: <i>Abm P Braveba</i>		SCDC #: <i>284717</i> W.R.C.I. MAILROOM
INSTITUTION: <i>Wallace</i>	DORM/SIDE/BED: <i>Dorm 2 SA</i>	HOUSING TYPE: <input type="checkbox"/> RHU <input type="checkbox"/> R&E <input type="checkbox"/> INFIRMARY <input type="checkbox"/> SSR <input type="checkbox"/> DEATH ROW <input type="checkbox"/> ASSISTED LIVING UNIT (ALU) <input type="checkbox"/> N/A
REASON FOR PAPER REQUEST: <input type="checkbox"/> PREA <input type="checkbox"/> MEDICAL <input type="checkbox"/> MENTAL HEALTH <input type="checkbox"/> DENTAL <input type="checkbox"/> MEDICAL COPAY <input type="checkbox"/> MEDICAL RECORDS <input checked="" type="checkbox"/> KIOSK INACCESSIBLE (EXPLAIN): _____		

YOU MUST USE THE KIOSK IF YOUR PAPER REQUEST DOES NOT MEET ANY OF THE CRITERIA ABOVE.

Barber,

Due to the tablet CTL Request home page is missing I mean does not show up at all. Nothing pertaining to any visible entry of "REQUEST." Please assist me concerning this requisite imperative priority I have pending work deadlines CA 01-03 and I need access.

IMEI NO. 357553441234567

ICC ID 140004920000057397

Respectfully Submitted

DISPOSITION BY STAFF MEMBER:

This needs to be sent through the kiosk to GIL. Tablet/Kiosk Troubleshoot. Include the MAC # not the IMEI or SN.

DATE: *8/22/24*

STAFF SIGNATURE: *BARBER*

20
RECEIVED
SEP 11 2024
W.R.C.I.
MAILROOM

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REQUEST TO STAFF MEMBER

TO: STAFF NAME: Barber		STAFF TITLE: Business Sector	DATE: 8/30/24
INMATE NAME: Abram D. Braveboy		SCDC #: 284787	
INSTITUTION: Wateree	DORM/SIDE/BED: Dorm-2-5A	HOUSING TYPE: <input type="checkbox"/> RHU <input type="checkbox"/> R&E <input type="checkbox"/> INFIRMARY <input type="checkbox"/> SSR <input type="checkbox"/> DEATH ROW <input type="checkbox"/> ASSISTED LIVING UNIT (ALU) <input type="checkbox"/> N/A	

REASON FOR PAPER REQUEST: PREA MEDICAL MENTAL HEALTH DENTAL
 MEDICAL COPAY MEDICAL RECORDS KIOSK INACCESSIBLE (EXPLAIN):

YOU MUST USE THE KIOSK IF YOUR PAPER REQUEST DOES NOT MEET ANY OF THE CRITERIA ABOVE.

Barber, from 8/14/24 request 19-11 form

There has been a mistake... there is no kiosk request electronic avenue for trouble shooting at all. I cannot press on REQUEST literally for entry to send ANY request for ANY assistance. That's why I'm working in this manual request. I need your assistance in the matter.

DISPOSITION BY STAFF MEMBER:

I Do not understand what you are asking for. please reward your request to better explain your question

DATE: 9/11/24 STAFF SIGNATURE: MR. BARBER

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REQUEST TO STAFF MEMBER

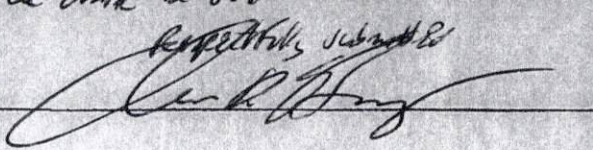
RECEIVED
3/24 2024

TO: STAFF NAME: <i>General Counsel</i>		STAFF TITLE:	DATE:
INMATE NAME: <i>Adam D Brandy</i>		SCDC #: <i>284787</i>	
INSTITUTION: <i>Waterloo</i>	DORM/SIDE/BED: <i>Dorm 2A</i>	HOUSING TYPE: <input type="checkbox"/> RHU <input type="checkbox"/> R&E <input type="checkbox"/> INFIRMARY <input type="checkbox"/> SSR <input type="checkbox"/> DEATH ROW <input type="checkbox"/> ASSISTED LIVING UNIT (ALU) <input type="checkbox"/> N/A	

REASON FOR PAPER REQUEST: PREA MEDICAL MENTAL HEALTH DENTAL
 MEDICAL COPAY MEDICAL RECORDS KIOSK INACCESSIBLE (EXPLAIN):

YOU MUST USE THE KIOSK IF YOUR PAPER REQUEST DOES NOT MEET ANY OF THE CRITERIA ABOVE.

W726 concerning 18 USC 3771 Criminal victim Rights Act due to malicious
 Hindous denial of Federal Proceed due to "HAND WRITTEN" documents per
 Petition going to the U.S. District court ordered by the U.S. Court of Appeals. Violation of
 Policy CA 01.08 and PS 10.08 11.1.1 Denied postage to deliver, by Business sector Victor
 Mr. Barber. When your office has already been apprised of the matter number prior. Division
 has violated upon ~~its~~ authority and committed an criminal offense 18 USC § 1701, 1702 and
 371 with Mr. Barber. In this impleative criminal procedure with the U.S. Attorney, U.S.
 Dept. of Justice already involved. with the U.S. District court listed in policy. NO
 REASON to deny Access to the courts should be because the petition is "HAND WRITTEN".
 General Counsel throughout this process has given clearance to the Article 172
 Supreme court procedure whenever on 1/31/24 needs to immediately call Warden
 Beckwith to make sure the petition that has a due date to send to Federal State
 Federal liberty rights Restored.
 While Warden that (Cyrilus Paim) or witnesses

Respectfully Submitted


DISPOSITION BY STAFF MEMBER:

DATE: STAFF SIGNATURE:

22 RECEIVED

NOV 06 2024

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
REQUEST TO STAFF MEMBER

GENERAL COUNSEL

TO: STAFF NAME: <i>General Counsel</i>		STAFF TITLE:	DATE: <i>10/30/24</i>
INMATE NAME: <i>Abram D. Braubay</i>		SCDC #: <i>284787</i>	
INSTITUTION: <i>Waterloo</i>	DORM/SIDE/BED: <i>Dorm 2A</i>	HOUSING TYPE: <input type="checkbox"/> RHU <input type="checkbox"/> R&E <input type="checkbox"/> INFIRMARY <input type="checkbox"/> SSR <input type="checkbox"/> DEATH ROW <input type="checkbox"/> ASSISTED LIVING UNIT (ALU) <input type="checkbox"/> N/A	
REASON FOR PAPER REQUEST: <input type="checkbox"/> PREA <input type="checkbox"/> MEDICAL <input type="checkbox"/> MENTAL HEALTH <input type="checkbox"/> DENTAL <input type="checkbox"/> MEDICAL COPAY <input type="checkbox"/> MEDICAL RECORDS <input type="checkbox"/> KIOSK INACCESSIBLE (EXPLAIN):			

YOU MUST USE THE KIOSK IF YOUR PAPER REQUEST DOES NOT MEET ANY OF THE CRITERIA ABOVE.

NOTE concerning 18 USC § 3771 criminal victim Rights Act due to malicious
 Honour Denial of Federal Procedure due to "HANDWRITTEN" documents pages
 that's going to the U.S. District Court ordered by the U.S. Court of Appeals. Violation of
 Policy GA. 01.03 and P.S. 10.08 11.11. Denied postage to deliver, by Business Sector Supervisor
 Mr. Barber. When your office has already been apprised of the matter months prior. Someone
 has violated supra with authority and committed an criminal offense 18 USC § 1701, 1702 and
 371 with Mr. Barber. In this important criminal procedure with the U.S. Attorney, U.S.
 Dept. of Justice already involved, with the U.S. District Court listed in policy. NO REASON
 to deny access to the courts should be because the petition is "HANDWRITTEN."
 General Counsel throughout this process has given clearance to the Article VI sec 2
 Supremacy Clause procedure whenever on 10/30/24 needs to immediately call Walter
 Backwith to make use the petition that has a due date be that EO Instantly State
 Federal liberty rights Restored
 Whole Warden Staff Captain Davis as witnesses
 Respectfully Submitted
Abram D. Braubay

DISPOSITION BY STAFF MEMBER: Policy prohibits writing multiple RTSM to multiple Staff
 Members about the same issue
*Inmate Braubay, I spoke to postal staff and general
 Counsel who informed me that the issue with your
 handwritten documents wasn't that they were hand
 written but that you had funds in your account to
 mail them but chose to spend most of your money in the
 canteen and then demanded we pay to mail your documents certified.
 For these reasons they were correct. If you are indigent per
 policy, your mail will be mailed. If you have money on your account, you will
 have to pay for the postage.*

DATE: *11-12-24* STAFF SIGNATURE: *[Signature]*

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT
1100 East Main Street, Suite 501, Richmond, Virginia 23219

23

September 17, 2024

CERTIFICATE OF SERVICE

No. 24-1673, In re: Abram Braveboy
8:23-cv-06104-TMC

CUA

I certify that my petition for writ of mandamus / prohibition was served as follows:

(provide date of service) October 25, 2024

(select manner of service) [] by mail; [] by commercial carrier; [] in person

(provide name(s) and address(es) of trial court judge and/or parties served):

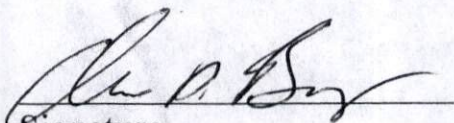
United States District Court

Office of the Clerk

250 East Main Street

Greenville S.C. 29601

Timothy Cain


Signature

10/25/24
Date

State of South Carolina

Mr. Abram D. Brubley

v. Appellant,

S.C. Department of Corrections

Respondent.

S.C. Courts of Appeals

Case No. 2025-000715

AFFIDAVIT

(B)

I Mr. Abram D. Brubley declare under the penalty of perjury. I am the Appellant Plaintiff victim in Double TORT in Equity in this hereto captured case, with personal knowledge of the facts and being competent to testify. Furthermore this Affidavit to support my motion for PERMANENT PRELIMINARY Injunction/Summary Judgment.

I. On April 8, 2025, the Appellant victim Plaintiff received an order case NO. 25-ALJ-04-0022-AP filed April 3, 2025, The decision by J. Phillip Lersta. Absurd granting the CVRA criminal victim Rights Act 18 USC 5371 Initial Attie Supporter Authority Clearance for phone call to U.S. court of Appeals Tony Webb (804) 416-2702, GENERAL COUNSEL with Waterlee Institution Warden office. Don Beckwith, Associate warden's Long, Wadley. Only to have a DENIAL Deliberate InjustICE violation of State liberty, property interest. Access to the Court GAG 1.03 Article 182 S.C. const. 14 Amendment U.S. const. Article 133 S.C. const. 14 Amendment U.S. const. Barber Business sector, mailroom Furman General Counsel for HANDWRITTEN Petition copies for Court. The Appellant seeking GRANT of PERMANENT INJUNCTION because of the February 26, 2025, postage mail See North Ref. NO. 25-03891945 7:08 AM "IMPERATIVE LEGAL MAIL Administrative Law Court Index." RECORD. That went to two destinations Administrative Law Court 1205 perdition Street Suite 224, Columbia S.C. 29206, GENERAL COUNSEL, 4444 Broad River Rd. Columbia, S.C. 29221-1787 NOT ONE mailroom "MOTION for Preliminary Injunction S.C. civil Rule 65/Summary J.C. civil Rule 56 ALJ Special Appeal Rule 60, 63" ON RECORD. From the March 20, 2025, Respondent "Motion to Dismiss nor April 3, 2025, ORDER GRANTING MOTION TO DISMISS. The Appellant plaintiff victim then due to procedural infraction violation to Impede 516-9-340 sent no motion to supplement the Record for liability/Rule 54 Demand for Judgment requesting \$3 million in compensatory and \$7 million in punitive damages. Against Summary Judgment Rule 56, Rule 65 Preliminary Injunct Structural Authority. Plaintiff did not know at the time OMISSION Federal offense 18 USC 1701, (1702) existed. The Postal Service DID NOT MAKE SURE supra entities received the Imperative Legal MAIL with already DENIAL of POSTAGE BY LIABLE TURFEEVOR mailroom Furman and Business Sector Barber. Conspiracy 916-17-40, 18 USC 5371 to COMMITTEE is Reason for opportunity Justice Forma Superior notification S.C. court of Appeals and Foreseeable Bounds v. Smith U.S. Supreme Court precedent violation. Preliminary Injunction DAMAGES WARRANTED, by ADDENDUM WARRANTED. J.C. Code § 1-11-460 Twenty million \$ 20,000,000.00 Aggregate Quantum. 1-23 Attachments

Pursuant to 28 USC 5374b, I declare under the penalty of perjury that the foregoing is True
6/17/25 DATE

Mr. Abram D. Brubley #344777
Waterlee Court, Inmate Room 2, Room
8200 White Farm Rd. P.O. Box 184
Clemson, S.C. 29638

WARDEN'S DECISION AND REASON:
Braveboy, Abram - 284787

WRCI-0150-24

I have reviewed your concern. In your grievance you stated that on 10/29/2024, Mailroom staff was not clear on SCDC policy regarding "Legal" correspondence to "Entity" US District Court, and according to staff, there was the need for Inmate Financial to authorize legal mail, understanding due process postage. On 10/30/2024, Inmate Financial did not authorize grievant to receive postage for his legal imperative to the Federal Court due to grievant's Petition being handwritten. This was a violation of Federal and State rights as well as a violation of SCDC Policy GA-01.03, "Inmate Access to the Courts." You asked that both staff members, the Mailroom staff and Inmate Financial, be held liable for damages after having been provided with proof of the US Court of Appeals Order. You need to send legal mail to the court. An investigation into your allegations has been performed, and upon completing a review of Agency Records and documentation, including your E. H. Cooper Account, it has been documented that on 10/20/2024 a money order in the amount of \$300.00 was deposited to your Cooper Account and another deposit of \$300.00 was made on 11/5/2024. It is also noted that on 10/23/2024 you made canteen purchases in the total amount of \$101.72 and on 11/18/2024 you purchased postage in the amount of \$5.11. As of today, your account balance is \$15.10. At no time during the past year have you met the qualifications to be deemed indigent. In accordance with SCDC Policy PS-10.08, "Inmate Correspondence Privileges," Section 4.1: Non-Indigent Inmates - Inmates with funds in his/her E.H. Cooper account, will be required to purchase mailing supplies (e.g., embossed postage envelopes, packing materials, etc.) through their institutional canteen. If additional postage is needed, it can be obtained through the Postal Director/designee. In addition, Section 11.1 Legal: Subsection 11.1.1 - The inmate's Cooper Trust Fund will be debited to cover the cost of all legal correspondence, to include envelopes, postage, etc.

Therefore, your grievance is denied.

If you disagree with this Warden's Decision (Decision), you may file an appeal by completing SCDC Inmate Grievance Form 10-5A, provided to you while serving you this Decision, and placing it in the Grievance Box at your local correctional institution within five (5) days of your receipt of this Decision.

DB L-H 11-25-2024
Warden Signature Date

- I accept the Warden's decision and consider the matter closed.
- I do not accept the Warden's decision and wish to appeal.

[Signature] 11-25-2024
Grievant Signature Date

[Signature] 11-25-24
IGC Signature Date

INSTRUCTIONS FOR COMPLETING STEP 1 GRIEVANCE FORM

1. An informal resolution shall be attempted prior to the filing of Step 1 by sending an Inmate Request to Staff Member (RTSM) form or Kiosk reference number to the appropriate supervisor. A copy of the answered RTSM must be attached to the grievance when the grievance is filed.
2. Complete each section in its entirety writing only in the space provided for inmate use. No additional pages will be permitted.
3. Only one (1) issue is to be addressed on each form.
4. Submit the completed form by placing it in the Grievance Box at your institution within eight (8) working days of the date on the RTSM response; policy grievances can be filed at any time. Disciplinary and Classification Review appeals must be submitted within five (5) working days of the hearing/review. Do not write in the space provided for the Warden's response.
5. If you are not satisfied with the Warden's decision, you may appeal to the appropriate responsible official within five (5) days of your receipt of the Warden's decision, by placing your Step 2 appeal form in the Grievance Box at your institution.

STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT

Abram Braveboy, #284787,

Appellant,

vs.

South Carolina Department of Corrections,

Respondent.

Docket No. 25-ALJ-04-0022-AP

**ORDER GRANTING RESPONDENT'S
MOTION TO DISMISS**

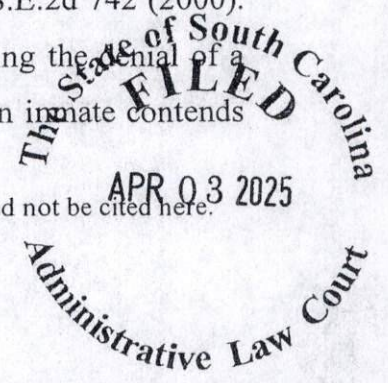
This matter is before the South Carolina Administrative Law Court (ALC or court) pursuant to a Notice of Appeal filed on January 16, 2025 by Abram Braveboy (Appellant) an inmate in the custody of the South Carolina Department of Corrections (Respondent or Department). After the Appellant's Step 1 and Step 2 grievances were reviewed and denied, he filed a Notice of Appeal with this court because he was told by mailroom personnel that handwritten documents cannot be mailed to U.S. District Court. Also, the Appellant contends that the Department should use a 10-14 Debit Form to send legal mail if an inmate does not have enough money in their E H Cooper Account. The Appellant is not appealing a disciplinary hearing conviction, nor did he lose any good time credit as part of any punishment he received.

On March 21, 2025, the Department filed a Motion to Dismiss pursuant to *Slezak v. S.C. Dep't of Corr.*, 361 S.C. 327, 605 S.E. 2d 506 (2004) and *Skipper v. S.C. Dep't of Corr.*, 370 S.C. 267, 633 S.E.2d 910 (Ct. App. 2006) requesting the court dismiss the Appellant's appeal because it does not involve a state-created liberty or property interest. On March 31, 2025 the Appellant filed a Motion to Supplement the Record for Liability/Rule 54 Demand for Judgment requesting \$ 3 million in compensatory and \$ 7 million in punitive damages.

DISCUSSION

The court's jurisdiction to hear this matter is derived entirely from the decision of the Supreme Court of South Carolina in *Al-Shabazz v. State*, 338 S.C. 354, 527 S.E.2d 742 (2000). The court's appellate jurisdiction in inmate appeals is limited to cases involving the denial of a state-created liberty interest,¹ which typically arises in two ways: (1) when an inmate contends

¹ The court does have limited jurisdiction in some property matters, the authority for which need not be cited here.



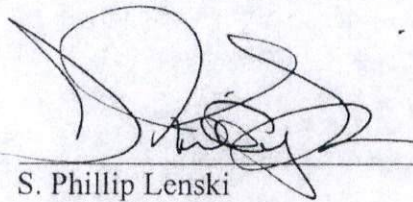
that prison officials have erroneously calculated his sentence, sentence-related credits, or custody status; and (2) when an inmate is disciplined and punishment is imposed in a major disciplinary hearing as a result of a serious rule violation. *See id.* at 369, 527 S.E.2d at 750.

When reviewing the Department's decisions in inmate grievance matters, the court sits in an appellate capacity. *Al-Shabazz*, at 756. Consequently, the review in these inmate grievance cases is limited to the Record presented. Pursuant to *Slezak*, the court is to have jurisdiction over all properly perfected inmate appeals, but “[s]ummary dismissal may be appropriate where the inmate’s grievance does not implicate a state-created liberty or property interest.” *See Slezak*, 361 S.C. at 331, 605 S.E.2d at 508. Further, in *Skipper*, the Court of Appeals of South Carolina interpreted *Slezak* as holding that a judge “should” dismiss a prisoner’s appeal where it does not implicate a state-created liberty interest. *See Skipper*, 370 S.C. at 279, 633 S.E.2d at 917.

In the case, the Department investigated and responded that per Department policy, inmates will be permitted to send an unlimited amount of legal mail regardless of their indigent status. Further, the Appellant’s mail was denied being mailed certified because it was not being sent to the Attorney General, not because it was handwritten. Department policy only permits certified legal mail for summons and complaints to the Attorney General. There is no state-created liberty or property interest implicated in this matter. As such, this is a case where the court must adhere to the traditional “hands off” doctrine regarding judicial involvement in internal prison matters. *See Pruitt v. State*, 274 S.C. 565, 266 S.E.2d 779 (1980); *Al-Shabazz v. State*, 338 S.C. 354, 527 S.E.2d 742 (2000) (emphasis supplied). Therefore, based on the foregoing,

IT IS HEREBY ORDERED that the Department’s Motion to Dismiss is **GRANTED** and this appeal is hereby **DISMISSED**.

IT IS SO ORDERED.



S. Phillip Lenski
Administrative Law Judge

April 3, 2025
Columbia, South Carolina

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served this order in the above entitled action upon all parties to this cause by depositing a copy hereof, in the United States Mail, postage paid, or in the interagency Mail Service addressed to the party(ies) or their attorney(s).

This 3 day of April 2025

Judicial Law Clerk



SOUTH CAROLINA
DEPARTMENT OF CORRECTIONS
Division of Legal Counsel & Compliance

HENRY McMASTER, Governor
BRYAN P. STIRLING, Director

4

March 20, 2025

The Honorable Sebastien Phillip Lenski
South Carolina Administrative Law Court
Edgar A. Brown Building, Suite 224
1205 Pendleton Street
Columbia, South Carolina 29201

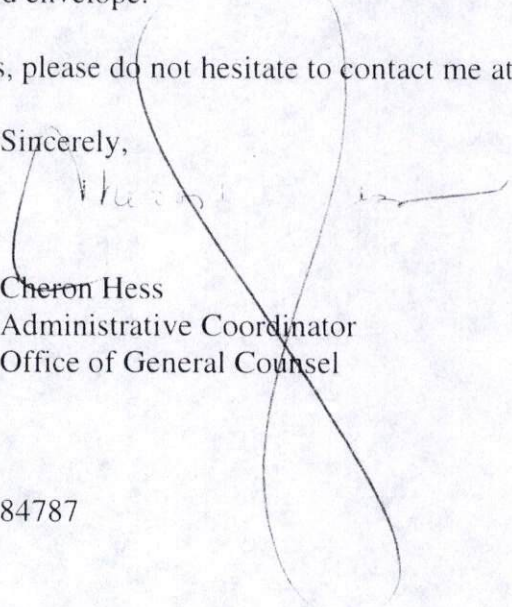
Reference: Inmate Abram Douglas Braveboy, #284787, vs. South Carolina Department of Corrections
Docket No. 25-ALJ-04-0022-AP

Dear Judge Lenski:

Find enclosed an original and one copy of the ***Respondent's Motion To Dismiss*** on the above referenced case. Please file the original in your office and return a clocked-in copy of the motion, that is provided, to me in the enclosed self-addressed envelope.

If you have any questions or concerns, please do not hesitate to contact me at (803) 896-3922.

Sincerely,


Cheron Hess
Administrative Coordinator
Office of General Counsel

Enclosures

cc: Inmate Abram Douglas Braveboy, #284787
File

STATE OF SOUTH CAROLINA
IN THE ADMINISTRATIVE LAW COURT

Abram Braveboy, #284787)	Docket No.: 25-ALJ-04-0022-AP
)	[Grievance No.: WRCI 150-24]
Appellant,)	
)	<i>Hon. S. Phillip Lenski</i>
v.)	
)	
South Carolina Department of Corrections,)	RESPONDENT’S MOTION TO
)	DISMISS
Respondent.)	
_____)	

STATEMENT OF THE CASE

This matter is before the Administrative Law Court (“ALC” or “Court”) pursuant to the appeal of Abram Braveboy (“Appellant”), an inmate incarcerated with the South Carolina Department of Corrections (“SCDC” or “Department”). On October 30, 2024, Appellant filed a Step One Grievance alleging he was denied the ability to send out legal mail.¹ Appellant is requesting that both parties be liable for damages, monetary compensation, and his legal mail be sent out. The Step One Grievance was reviewed and denied on November 25, 2024. Thereafter, on November 25, 2024, Appellant filed a Step Two Grievance.² The Step Two Grievance was reviewed and considered resolved on or about December 18, 2024. This appeal followed.

STANDARD OF REVIEW

The ALC’s jurisdiction to hear this matter is derived entirely from the decision of the South Carolina Supreme Court in *Al-Shabazz v. State*, 338 S.C. 354, 527 S.E.2d 742 (2000). When reviewing SCDC’s decisions in inmate grievance matters, the ALC sits in an appellate capacity. *Id.* at 377, 527 S.E.2d at 754. Recently the South Carolina Supreme Court clarified the Administrative Law Court’s jurisdiction as:

¹ A copy of the Step One Grievance is attached for the Court’s and parties’ convenience.

² A copy of the Step Two Grievance is attached for the Court’s and parties’ convenience.

[t]hat the ALC has subject matter jurisdiction over inmate grievance appeals that have been properly filed. (*internal citations omitted*) . . . [h]owever, the ALC is not required to hold a hearing in every matter and may summarily dismiss an inmate's grievance if it does not implicate a state-created liberty or property interest sufficient to trigger procedural due process guarantees. The ALC may not grant an inmate relief from an erroneous administrative decision by SCDC, however, unless the inmate demonstrates the error deprived him of due process... (*internal citations omitted*)

Allen vs. S.C. Dep't of Corr., 439 S.C. 164, 170-71, 886 S.E.2d 671, 674 (2023).

“The requirement of procedural due process apply only to the deprivation of interests encompassed by the Fourteenth Amendment’s protection of liberty and property.” *Al-Shabazz*, 338 S.C. at 369, 527 S.E.2d at 750 (*quoting Board of Regents of State Colleges. v. Roth*, 408 U.S. 564, 569, 92 S.Ct. 2701, 2705 (1972)). SCDC interprets *Slezak* as encouraging, for the sake of judicial economy, the ALC to summarily dismiss inmate cases that do not involve a state-created liberty or property interest. *Slezak v. S.C. Dep't of Corr.*, 361 S.C. 327, 605 S.E.2d 506 (2004) (holding that the ALC “may summarily dismiss those appeals that do not implicate an inmate’s *state created* liberty or property interest”) (*emphasis added*). The South Carolina Court of Appeals has interpreted *Slezak* to mean that where a state-created liberty interest is not implicated in a prisoner appeal, a judge of the ALC “should” dismiss the appeal. *Skipper v. S.C. Dep't of Corr.*, 370 S.C. 267, 633 S.E.2d 910 (Ct. App. 2006).

ARGUMENT

This case should be dismissed under *Slezak* and *Skipper*. Appellant alleges that he was denied the ability to send legal mail to the Court. *See* Step One Grievance. The grievance was investigated and it was determined that Appellant was denied the ability to send out his mail because it was certified mail and that this denial was pursuant to policy. *See* Step Two Grievance. Appellant’s claim does not involve a state-created liberty or property interest. Appellant does not allege that Respondent erroneously calculated his sentence, sentence-related credits, or custody status, and Appellant’s claim does not involve the loss of a state-created

liberty interest in a major disciplinary hearing. Appellant's allegations do not implicate a state-created liberty or property interest sufficient to trigger procedural due process guarantees. Therefore, this Court should dismiss this appeal, with prejudice.

CONCLUSION

Because the case does not implicate a state-created liberty or property interest this case should be dismissed.

Respectfully submitted,

Lauren Stevens

Lauren Stevens
Staff Attorney
South Carolina Department of Corrections
PO Box 21787
Columbia, South Carolina 29221
Phone: (803) 896-8508

March 20, 2025
Columbia, South Carolina

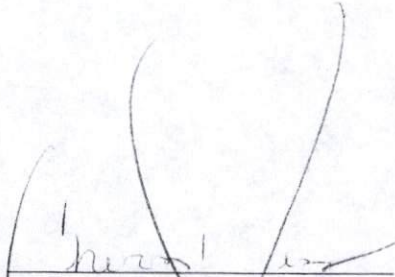
STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT

8

Abram Douglas Braveboy, #284787,)
)
 Appellant,)
) **Certificate of Service**
 vs.)
) Docket# 25-ALJ-04-0022-AP
 South Carolina Department of Corrections,)
)
 Respondent.)

I hereby certify that a copy of the foregoing *Respondent's Motion To Dismiss* was, this date, served upon the following individuals by placing a copy of the same via mail to his/her last known address as follows:

Inmate Abram Douglas Braveboy
Inmate Number: 284787
Wateree River Correctional Institution
Dorm-Room-Bunk: D2-0005-B


Cheron Hess
Administrative Coordinator
Office of General Counsel
South Carolina Department of Corrections
4444 Broad River Road
P.O. Box 21787
Columbia, South Carolina 29221-1787
(803) 896-3922

March 20, 2025

ADMINISTRATIVE LAW COURT

CASE NO.

"Motion to Supplement the Record for Liability/Rule 54 Demand for Judgment"

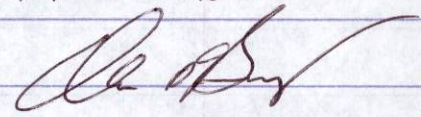
Matter Exigent, Extraordinary confirm AUTHENTICATIVE Appellant victim Plaintiff Abram D. Brandy
 "Motion for Preliminary Injunction S.C. Civ. Rule 65/ Summary Judgment S.C. Civ. Rule 56 ALL Special Appeals Rule 60, 63" Paramount Penalty due to March 20, 2021 GENERAL COUNSEL Steven Staff Attorney.
 Chest Hill Administrative Coordinator OFFICIAL Ingersoll Actual Attempt to Respond to the Noncontroversial Appra MOTION for DEFENSE. In mockery against S.C. Civ. Rule 56(c) Admon procedure in DEFAULT S.C. Civ. 55 NO FIRST HAND PERSONAL KNOWLEDGE, AMBIGUOUS even verified complaint. Article 153 S.C. Constitution, 14th Amendment U.S. Constitution. Anderson v Liberty Lobby 466 S.Ct. 2505 (1986) subjecting oneself under penalty of perjury Drastic Rapid Redress. Rule 56(c) AFFIDAVIT 1) It must BE MADE UPON PERSONAL KNOWLEDGE 2) It must set forth Facts admissible in EVIDENCE. 3) It must show THAT AFFIDANT is competent to testify to the matters stated therein. This Honorable Court, due to such attempt to BEGUILT CONTEMPT 56-25-80 to NEARLY Criminal S.C. code 56-17-40 CONSPIRACY TO IMPED 56-9-340. NEXUS 10/30/21 Anonymous GENERAL COUNSEL S.C. code 51-11-460. Answered concealment Duration Forceability to SUPPLEMENT Pecuniary Damages PATER GOOD CONFERENCE Lane in New York Life Insurance Company 56 Hun 4229 N.Y. St. Rep 4829 N.Y.S.2d 2/14/1890 S.C. code 514-1-50 Common Law. PROVEN ALL GENERAL COUNSEL OFFICE NOVEMBER 30, 2023, until October 30, 2021. for AUTHENTICATIVE Supreme Clause Article II Sec (2) Congressional procedure 105th Congress 150th Congressional Record 18 USC 3771. Article 1524 S.C. constitution 56-3-1645 - 56-3-1640. (CIVIL Criminal victim Rights Act Admitted procedure) SEE Ledgered MOTION pg. 8 Rule 65/56 Affidavit 1 and 2 Proof. Due to Absolute ACTUAL MALICE OBSTINATE GENERAL COUNSEL LEADS WHIMPER BREACH OF DUTY DELIBERATE INDIFFERENT NEGLIGENCE S.C. code 515-75-70(b) Conspiracy 1) Defendant owed duty of care to the plaintiff 2) Defendant breached duty by negligent act and OMISSION 3) defendant breach was actual and proximate cause of plaintiff injury and 4) Plaintiff suffered injury and damages Article III 526 S.C. Constitution "ALL MEMBERS of the Bar OATH "to help me feel." PARALLEL CONSTITUTORS

L I A B I L I T Y
S U P P L E M E N T

Through RECORD KNOW REFERENCE CLEARANCE PEUUCO WITH CONFERENCE WITH WATCOE WARREN STAFF in Entirety. GENERAL COUNSEL HAS NO Similar Genuine Issue of material fact Defense to Combat. CONVERSE WAS THE only Lawful Legal Result FOR GENERAL COUNSEL BAR MEMBERS Abram D. Brandy family's MENTAL, EMOTIONAL, Physical being MUST BE RESTORED TO TOTALITY

3/25/25
DATE COMPENSATORY
\$ 3,000,000.00

PUNITIVE
\$ 7,000,000.00



Three million Dollars

SEVEN million Dollars

Mr Abram D. Brandy

Secretary financial managers P.O.A. Biological mother Mr. Dorothy Burgess Brandy
can be reach once finalized (803)-351-8460

WLE Bm 2-B-5
PO Box 159
Rowlet S.C. 29126

Mr. Moran R. Bradley
WLE - Rem 2 Bide tag 28707
P.O. Box 184
Spartanburg S.C. 29128

FIRST CLASS



US POSTAGE

ZIP 29128
02 7H
0065210082

\$ 003.710

JUN 18 2025

RECEIVED

JUN 23 2025

SC Court of Appeals

S.C. Court of Appeals
Terry Abbott Vitchinger Clerk
P.O. Box 11629
Columbia S.C. 29211

