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SEP 22 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

CA NO. 25-000715

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lentzi

CASE NO. 25-ALT-04-0022-AP

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SOUTH CAROLINA DEPARTMENT  
OF CORRECTION

Respondent

v.

Abram D. Braxby

Appellant

---

MOTION FOR PRELIMINARY INJUNCTION

S.C. Civil Rule 65 / Summary Judgment S.C. Civil Rule 56

Pro Se  
Mr. Abram D. Braxby  
Waterloo Corr. Inst.  
P.O. Box 189  
8200 Statefarm Rd.  
Rembert S.C. 29128-0189

# The South Carolina Court of Appeals

Abram Braveboy, #284787, Appellant,

v.

South Carolina Department of Corrections, Respondent.

Appellate Case No. 2025-000715

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## ORDER

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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.").



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FOR THE COURT

Columbia, South Carolina

cc:

Abram Braveboy, 284787

Christina Catoe Bigelow, Esquire

**FILED**  
**May 28 2025**

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JUN 23 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

41A No. 25-000215

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S Phillip Leski

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

---

SOUTH CAROLINA DEPARTMENT  
OF CORRECTIONS

Respondent

v.

Abram D. Bracey

Appellant

---

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

Pro Se  
Mr. Abram D. Bracey  
Walter Co. Inst.  
P.O. Box 189  
192 Whitefarm Rd.  
Rembert, S.C. 29128-0189

# TABLE OF CONTENTS

Table of Authorities

Averment of Issues on Appeal

Averment of the case

Imbodio I

Imbodio II

ADDENDUM

CONCLUSION

Proof of Service

Appendix

Affidavit

CA1 (B)

1-3

1-4

# TABLE of AUTHORITIES

## Case Cites

<u>Allen v. SCDC Supreme Court J.C.</u>	J.E.2d 671, 439 P.C. 164 April 5, 2023	<u>Record</u> Waiver Request 25-03841445
<u>Anderson v. Liberty Lobby Inc.</u>	106 S.Ct 2805 (1986)	
<u>Al Shubazz v. J.C.O.C.</u>	527 J.E.2d 742, 338 P.C. 354 February 14, 2000	<u>S.C. Appellate</u> <u>Rules</u>
<u>Beal v. Hardy</u>	769 F.2d 213 (4th Cir. 1985)	201, 208
<u>Bayah v. Coughlin</u>	U.S.C.A 2nd circuit F.2d 486, 789 (1986)	
<u>Bownds v. Smith</u>	97 J.Ct. 1444 430 U.S. 817, 52 LEd 2 72, April 27, 1971	S.C. Administrative Law Court Special Appeals
<u>Celotex Corp v. Catrett</u>	106 S.Ct 2548 (1986)	<u>Rule 60, 63</u>
<u>Compton v. SCDC</u>	709 N.E. 2d 639, 392 J.C. 361 May 2, 2011	<u>SCDC policy</u>
<u>Deans v. COX Trans</u>	152 F.3d 326 (4th Cir. 1998)	<u>CA 06.03</u>
<u>Ex parte Martin</u>	321 J.C. 533, 535, 41 J.E.2d, 134, 134-135 (1995)	
<u>Hancock v. MID South Mgmt Co.</u>	381 J.C. 326, 673 N.E.2d 801 (J.C. 2004)	
<u>Harrell v. Purcell</u>	236 F.2d 526 (M.D. N.C. 2002)	
<u>Jennings Mill Inc. v. Israel</u>	SCCA 442 J.C. 42, 847 J.E.2d 201 January 26, 2021	
<u>Lore v. New York life insurance company</u>	J.C. Sup Ct 45 S.E. 146, 147 J.C. 333 October 14, 1928	
<u>Lanham v. Blue Cross + Blue Shield</u>	344 S.C. 356, 563 J.E.2d (2002)	
<u>Lord v. David J. Enterprise Inc.</u>	407 J.C. 544, 757 J.E.2d 695 (J.C. 2004)	
<u>Machin ex rel Bryant v. Babcock ctr. Inc.</u>	371 J.C. 123, 638 J.E.2d 650 (2006)	
<u>Martin v. New York</u>	501 U.S. 446, 115 S.Ct. 2419 (1991)	
<u>J.C. Animal Conservation League v. J.C. Dept of Health + Environmental Control</u>	669 J.E.2d 899 2008 WL 4093075	
<u>Sea board Airline Ry v Atlantic coast line Roco</u>	88 J.C. 417 71 N.E. 39 April 1911	(S.C. App. 208)

## J.C. Constitution

- Article 1 § 2 J.C. Constitution
- Article 4 § 3 J.C. Constitution
- Article 1 § 15 J.C. Constitution

## U.S. CONSTITUTION

- 11th Amendment
- 9th Amendment
- 14th Amendment

## J.C. Statutes

- § 1-11-460
- § 1-23-610
- § 8-1-10
- § 14-1-50
- § 15-28-20(b)
- § 16-9-10
- § 16-9-340(2)(C)

## FEDERAL CONGRESSIONAL LAW

- 18 USC § 371
- 18 USC § 1201, 1202
- 16 USC § 3721
- 28 USC § 1246
- 28 USC § 2254

## J.C. Civil Rules

- Rule 54
- Rule 56(c)
- Rule 65

## AVERTMENT OF ISSUES ON APPEAL

The Appellant victim morant usual language in sine ramero preamdes. In a step 1 Grievance that was present Day in favor of The Rule 65 Preliminary Injunction Abram D. Bravebay. Structing Bounds v. Smith Extreme Denial of Access to the courts SCDC policy CA 04.03 Legal MAIL Robbery. Instead of consternation 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 waterce Legal Stamp. post office mark date, by INFRACATOR Mr. Furman who was Co-Star with Mr. Barber in Step 1 Grievance Litigius 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 S. Phillip Lenki. The Ledger FIRST Inquisit gave ostensible "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 20, 2025 via Christina Cate 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, Celetox corp v. Catrett. The Immediate Reply was done 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, Compensation, Punitive, Fire Liability, 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 (1-2) Essential evidence of Impede offense supra NON EVIDENTIARY Appalling. LITEN DENIAL of mail Tamnit for court, IS ALREADY MAJOR PREMISE of TORT for Magna Culpa feason LIABILITY Responsibility. There is no way THEY RESPOND IN JUSTIN EUPRIS. OMISSION. There 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 destruction mail correspondence. Therefore unjust fundamentally UNFAIR DECISION. AN ARTIFICE CHEAT faced with conspiring Bilkers, except for the "ENTIRE RECORD" fundamentally FAIR S.C. Administrative Law Court, NO Sea Spate, Sea Potatos INVESTIGATION, for SUPPLEMENT motion explanation. Which should NOT RECEIVE ANOTHER CHANCE. This HONORABLE COURT CAN MAKE THE JUST Preliminary Compton v. SCDC Decision being too Universal STUNNING Jaw-DROPPING. Reiterate Indifference VACANT of STATE LIBERTY RIGHT TO DIE PRECEST Article 1 § 3 S.C. CONSTITUTION, 14th Amendment U.S. constitution, Article 1 § 9 S.C. constitution Quick SPEEDY SOLIDIFIED, CONCRETE. IRONCLAD CASE. "Remedy" for the FIRST LIABILITY proposition p. 8

within Preliminary motion to 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 Injunctio prima facie. After scanning first pages Handwritten within  
Approval from Phantom employee General Counsel to OBLITERATE Access to the courts right  
October 30, 2024 for CONVICT 10-14 debit postage mail Due to HANDWRITTEN PETITION emotional  
Intangible, Tangible INJURY. Due to the FIRSTHAND FACTS. ASTRONOMICAL MAGNITUDE EXTREME  
DENIAL AGAIN. Rule 65 has established Abram O. Browley has justified 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, 2025, former Paupers 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 Dodge to Due Process by the Honorable Court, Knowing Redress  
IT WARRANTED. The victim Appellant morant seeks 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  
as a citizen or as a Pre-citizen inmate. Malevolent Artifice of Treacherous universal punishment,  
DENIAL of fundamental Constitutional Right Article I & II U.S. Constitution, 8th Amendment U.S.  
Constitution.

## AVERTMENT of the Case

The Appellant victim Grievant Plaintiff once more April 8, 2025, received stocking to Legal procedure in this case NOT Acknowledging dealing with the Genuine Material Facts that cannot be disputed. The Appellant retrieved S.C. Administrative Law Court order of Phillip Lenthi 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 sound Decision... NO... the Acting Judge J. Phillip Lenthi, DID NOT GET NEXUS Fortissimo Proof of SCDC policy CA 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 4444 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 their Motion to Dismiss. Supra grant by LAW MAN J. Phillip Lenthi 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's NO WAY the Appellee Defendant made mockery of the court by sending this FRIVOLOUS, ~~TOO~~ 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 Despotie pillage. Filed Motion to supplement the Record for Liability / Rule 54 Demand for Judgment requesting \$3 million in compensatory and \$7 million in punitive damages. These missing Disappearance of Clandestine priority Legal mail MOTIONS violating state liberty essential Right constitutional

Article 1 § 2, 3 S.C. constitution, 1<sup>st</sup>, 14<sup>th</sup> Amendment U.S. constitution Due Process. Bays  
The Question does anyone within the State of South Carolina have any elementary lay  
Person legal understanding concerning Access TO THE COURTS For the Reason of Furman/Barber  
HANDWRITTEN Petition to David Copperfield missing motions. From an November 30, 2023 writ  
Criminal victim Rights Act procedure 18 USC § 3771 U.S. District Court § 2254 Habeas Corpus  
Greenville S.C. U.S. District Court Alexandria V.A., 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 § 5.11  
SEE <sup>Applicant</sup> Attachment (15) <sup>Attachment</sup> 1 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 get postage prior  
Due to malicious conspiracy. October 30, 2024, IMMEDIATE GRIEVANCE was filed step 1  
NO. WRCI-0150-24 Stamped. Warden Beckwith, Associate Warden Wackley, Associate Warden Long  
"Office of GENERAL COUNSEL" assisted in the WRA Appellant process November 25, 2024,  
committed conspiracy denying the Circuit Action requested. Step 2 grievance November 26, 2024.  
On December 18, 2024, 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. 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 BLC  
Special Appeals Rule 60, 63." AFFIRMMENT OF THE CASE.

## STANDARD of Review

S.C. court of Appeals May 28, 2025 order *Forma Pauperis* grant covers ALL expenses  
initial Brief / Motions Rule SCAR 208 Ex parte Martin 321 S.C. 533, 535, 471, S.E.2d 134, 134-35 (1995)  
S.C. code § 1-23-610, § 15-1-10, SCACR 201 Right to Appeal. Civil Rule 65 preliminary Injunction  
Jennings-Pill, Inc. v Israel JCCA 442 S.C. 98, 897 S.E.2d 201 January 24, 2024 For "Sound discretion...  
to protect the rights of many parties sufficient to support prima facie showing." Compton v. SCPC  
342 S.C. 361, 709 S.E.2d 139 May 2, 2011 "to preserve status quo and prevent irreparable harm to  
the party requesting it." Seaboard Air Line 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 affidavit and upon  
the return and its supporting affidavit, 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  
MISSING MOTIONS, for preliminary Injunction 2/25/25 in Min GENERAL COUNSEL, Administrative Law  
Court Ledger Entire RECORD. S.C. code § 1-11-460 LIABILITY JURISPRUDENCE AUTHENTICATIVE. SC RACT  
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, dispositions answered 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. 106 S.Ct. 2505 (1986), Woodson v. RLT Properties LLC 406 S.C. 517,  
755 S.E.2d 428 (2014), Rule 56(c) SCACR. Regarding for the purpose of Summary Judgment, a material fact is a fact  
that might affect the outcome of the case under the governing law, moreover 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 considered  
or even considered during the Summary Judgment stage at all, Anderson supra at 210. In determining  
whether any triable issues of fact exist 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. 466, 111 S.Ct. 2004 (1991); Lord v. Dad 2 Enterprises Inc. 407 S.C. 544, 757 S.E.2d 645 (S.C. 2014)  
Importantly 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 computation of inferences, Reas v. CFX Trans, 152 F.3d. 326 (4th Cir. 1998) Beel v. Hardy,  
74 F.2d. 263 (4th Cir. 1935) 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. M20 South Mpt Co, 381 F.C. 326, 633 O.E. 2d 801 (D.C. 2004) what is more Summary Judgment is not appropriate where further inquiry into the facts of the case is a desirable to clarify the application of law. Lanham v. Blue Cross + Blue Shield, 349 F.C. 356, 563 O.E. 2d (2007) 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 Chr. Inc. 381 F.C. 125, 638 O.E. 2d 650 (2004) 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 2505. 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. Havelle Russell, 276 F. Supp. 2d 526 (M.D. N.C. 2002) critically Levin, 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 otherwise, provided in this rule, must set forth specific facts showing that there is a genuine issue for trial. If the party does not so respond Summary Judgment if appropriate shall be entered against him. Celtra Corp v. Cottrell 106 Fed 2545 (1986)

## Imbroglio I

It is Genuine Issue of material Fact The victim Appellant's Due course Administrative Procedure POSTAGE has been OBSTRUCTED, IMPAIRED. Kiork Reference REQUEST 25-03841945 2/26/25 3:16 PM Clarified received by mailbox Furman. "Imperative Legal mail Administrative Law Court Today. NEED mail transit. Thank you. 2/26/25 7:08 AM Sent "Motion for preliminary Injunction J.C. Civil Rule 65/ Summary Judgment J.C. Civil Rule 56 ACC Special Appellate Rule 60, 63." Administrative LAW Court GENERAL COUNCIL APPROE. Disappearance of PRIORITY VITAL LEGAL MAIL for Adjudication of matter in Appellant Behalf when mailbox/Business sectors are Responsible for DENIAL of Access to the Court GA01.03 JDC policy WITHOUT/CONTRAVERT 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 POSTAL MAIL Transit, Especially from Rural systems Institutions NEED Legal MAIL TRANSIT, correspondence. The victim Appellant in a Criminal victim Rights Act Writ of Mandamus 18 USC 5371 procedure NEEDED this simple elementary lawful Legal process 1<sup>st</sup> Amendment Freedom Liberty of State Interest Right. Due Process LAVPECTION comprehension problem HANDWRITTEN petition the Appellant knows as well as the fact the U.S. District court is in Policy, GA 01.03 as LEGAL MAIL priority destination. On October 30, 2024, Furman mailbox Barber Business Sector colluded with the Authority of a Scientist. Barber decided to make sure mailbox OBSTRUCTION was committed "NO HANDWRITTEN PETITION AUTHORIZED Exclusion. [SEE AFFIDAVIT (A) ATTACHMENTS (1-23)] The Appellant in Legal Battle knew there was NO WAY there would be an CONTINUAL SCHEME HINDERANCE on February 26, 2025. The Appellant writing Plaintiff confident to get the LEGAL VITAL MAIL to the Administrative LAW Court "TODAY", and GENERAL COUNCIL, 625 Paulleton street suite 224 Columbia S.C. 29204, 4444 Broad River Rd. Columbia S.C. 29221-1787. He sent on circa Kiork Request 25-03841945 7:08 AM "Imperative Legal mail Administrative Law Court TODAY," February 26, 2025. The Appellant argues, is this a coincidence meriam-webster Dictionary Definet - a situation in which events happen at the same time in a way that is NOT planned or expected. Was at that point in Tempus the Appellant do expect these Two PARAMOUNT MOTIONS in which Any TRUE LAWYERMAN, LAW MAN will decide according to the Standard Review Authority to Preliminary Injunct, Rule, FIND, ADJUDICATE, DETERMINE, CANCEL and SETTLE this Extraordinary

circumstance case in the victim Appellants favor. To EVANESCE. According to Article 213 DC constitution, 14th Amendment U.S. constitution, just look forward to TWO MOTIONS For Abstract Judgment to DEMATERIALIZIZE or Did the Warden Office Staff, Business Factor, Director office of operations, GENERAL COUNCIL office in JUVENILE, decide to VANISH There LEGAL ACCESS TO THE COURT DOCUMENTS to Abscond 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 IMPROB §15-78-70(b) moral Turpitude Circumstance unprofessional impropriety §16-9-340 Unfair scheme. The court MUST DECIDE between Those TWO TEAMS This case has the CRYSTALLIZE TEAM for ENTIRE RECORD DEMAND. IN ORDER FOR THE Administrative Law Court Judge J. Phillip Lenchi 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 WANT ANNUAL WASTEFUL WASTING to Agree with NO ENTIRE WHOLE RECORD. To make SOUND Fundamentally FAIR, Carriage of Just Reasonable, Tenable, INCONVERTIBLE, INDIVISIBLE, INDEFINITE, UNREVERSIBLE AUTHOREZE GENUINE MATERIAL FACT Rule 56(c), Rule 65 preliminary under Penalty of perjury Trial by VINDICATION Record Procedure.

Ita Lex Scripta Est DC 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 petitioner have been PREJUDICED because the finding conclusions or decision is:

- (a) IN VIOATION of CONSTITUTIONAL or STATUTORY PROVISIONS... OFFENSE UNDER procedural codes
- (b) The extent of the statutory authority of the agency in JCDC policy violation, genuine
- (c) made upon unlawful procedure... prelegal omission, NO ENTIRE RECORD substantive Affidavit 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 DECEPTION  
FROM THE WHOLE RECORD, REVERSE, FULFILL, AND MODIFY according to the  
March 24, 2025 "MOTION TO SUPPLEMENT THE RECORD FOR VIABILITY (Rule 54 Demand  
FOR JUDGMENT. THAT WAS NOT DUE TO COMPREHENSION OF RIGHTLY CONSTRUCTED LAW  
RULE 56(C) 65 ERROR OF JUST ITIGATION LEGAL PROCEDURE PROCESS. PREJUDICE  
EXISTING SUBSTANTIVE RIGHTS HAVE BEEN ANNIHILATED STATE LIBERTY, MUCK, SEE APPENDIX  
APPENDIX (A) ATTACHMENT 1-23.

Administrative Law Judge J. Phillip Leski should get an REMAND, but the  
Appellant is Afraid, Fearful The mail might NOT GET TO THE DESTINATION CONSUMER COUNCIL  
might intercept. This court needs MUST, OUGHT THE ESSENTIAL AN REQUIREMENT THE SAME  
POST OFFICE SERVICE FOR SABOTAGE, LEGAL SUBTERFUGE COULD BE INVOLVED. THE ADMINISTRATIVE JUDGE  
MUST NOT GET THE CHANCE WITH THIS QUANTIC CASE. THIS HONORABLE COURT BY LAW  
REQUIRE MUST MAKE AN PRELIMINARY INJUNCTION. AL-Shabazz PRELIMINARY AUTHORIZATIVE  
PHONE S.C. code §1-11-460 FOR ADDRESS LIABILITY. SEE Allen v JDC Supreme Court, 886 N.E.2d 621,  
439 S.C. 164 April 5, 2023. AL-Shabazz "Denial" of THE INMATES DUE PROCESS IN PRELIMINARY INJUNCTION  
AL-Shabazz DENIAL of Freedom [FEDERAL] State created liberty INTEREST to be ENTITLED to  
RECEIVE for the "Denial" of his [INMATE TRANSFER] DUE PROCESS RIGHTS - Preliminary Injunction  
Rule 65 [SEE APPENDIX (A) Prima facie motion for Preliminary Injunction February 28, 2025]  
AL-Shabazz - ADMINISTRATIVE DECISION by JDC would be reviewed ONLY for A "DENIAL" of the  
INMATES DUE PROCESS RIGHTS in Preliminary Adjudication, Genuine ISSUE of MATERIAL FACT the  
"Justiciary" CANNOT BE RESPONSIBLE as malefactor by committing more offenses for contempt  
OMITTING ESSENTIAL substantial evidence according to Tribunal State Recor procedure and NOT  
BE HELD MORE CHARGE with a phone call to Warden Dan Beckwith office to ensure. The  
Appellants mother Ms. Dorothy Burgess as well. The P.A. Biological mother of the compensatory  
punishment for your son is finalized. JUSTICE for Mr. Maram N. Brumley is tangible NO ONE  
will INTERFERE WITH THAT LEGAL LAWFUL PROCEDURE TO VINDICATE Burrows v Kimb

97 S.Ct. 1491 480 U.S. 812, 52 L.Ed. 272 April 27, 1991 DENIAL Access to the courts. This is genuine issue of material fact that cannot be responded to. The Atties General counsel in CURA process cannot DENY the WHOLE, ENTIRE, TOTAL RECORD. Read examine the mailing but received motion for preliminary Injunction S.C. Civil Rule 65/ Summary Judgment S.C. Civil Rule 56 ALL Special Appeals Rule 60, 63 2/25/25 NO Scintilla can be given of any essential, substantive factual evidence to PRECLUDE Appellant victims Ruling, Elipio NUNEZ IMPROVE DEATH... MORE than substantial.

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

S.C. Natl Conservation League v. S.C. Dept. of Health + Environmental Control  
669 S.E.2d 899 2008 WL 4693075 (S.C. App 2008)

NO FIRST HAND Under Oath Personal Knowledge Affidavit to combat  
NO CONSIDERATION for Legal Jurisprudence, Rectitude, Ethical Triumph in  
a S.C. Civil Rule 56(c), 65 Structural procedure, And S.C. Appellate Rule  
208.

The General Counsel according to the Appellate Supplement SCDC  
SOUTH CAROLINA DEPARTMENT OF CORRECTIONS at an EQUITY J.C. Code of Law  
51-11-460 [SEE AFFIDAVIT & Attachment(s) 9]

### The AGGREGATE QUANTUM

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

For this Honorable Court of Equity, J.C. Code §14-1-50 Acquiesce erroneous multiple J.C. Code  
§15-78-50(c) by RIGHT OF VICTIM Appellant. Due to J.C. Code §15-78-70(b) non Immune from  
suit PROVEN that employees conduct WAS NOT WITHIN the scope of supra official duties  
and that it constituted ACTUAL PROXY, ACTUAL MALICE, INTENT TO HARM, and CRIME  
involving Moral Turpitude MISCONDUCT J.C. Code §84-50. This Preliminary INTERVIEW Summary  
Judgment that Respondent CANNOT CONTEND MUST CONCEDE PERFECT TO PERMANENT  
DAMAGES for GOOD AND FAIR CONSCIENCE LANE v. NEW YORK LIFE insurance company  
S.C. Ct. 145 S.E., 146, 147, J.C. 353 October 14, 1928

This ADDE M DUM will BE according to Ex Ruler Just  
51-11-460 Imbutio II

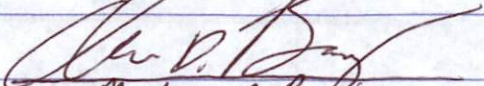
\$ 70,000,000.00

"A MAXIMUM of TWENTY MILLION DOLLARS" J.C. Code §34-3-65 threats  
Debt obligation for FINANCE of SCDC must upon order of Forum discuss with the  
victim plaintiff. Appellant vital can concerning the disbursement allotment of FINANCE to  
Establish accounts were TRANSFER with desired financial transfer Institutions Wells Fargo  
Private Bank to Establish joint wire conduit deposit accounts. As BEEN fit by Plaintiff. The  
Plaintiff needs the courts Clearance authority with Institution Administrator if still present incarcerated  
P.O.A. Dinky Burgess must be apprised (703)-351-8460 as well for completion of Debt obligation."

May it BE DONE upon Tabula Rasa now Etched in LEDGER on circum Day  
of our

6/17/25  
DATE

WRO

  
Mr. Adam D. Praseky

## CONCLUSION

1st Amendment U.S. Constitution, Article 1 § 2 U.S. Constitution DEMANDS THE RIGHT of the people regardless of Penal incarceration to Lawfully Petition the government, any Department Head for redress of GRIEVANCES. The J.C. or any public school for some reason J.C. Department of corrections Wateree Corr. Institutional mailroom staff, Business sector, Warden's office SDC Director office of Operations, GENERAL COUNSEL, DID NOT RECEIVE THIS comprehension. The school system failed the Tortfeasors, therefore a deceitful plan seeking maliciously to violate such Fundamental Authority, Access to the courts is Access to Justice. To approve or GENERAL COUNSEL in Congressional procedure only to DISALLOW the Law of the LAND constitutional Right. The substantial Essential Evidence was pre-terlegally DENIED conspired by these Quenter Denier. Whole Record antiquity of Truth has now BEEN RIGHTFULLY placed in JUSTICE HANDS. Treulent unprofessionalism CANNOT CONTINUE.. PUNISHMENT to INTELLECTORS. NONPARTIZAN GENUINE MATERIAL FACT FIRST HAND KNOWLEDGE ELIATES PREJUDGE SHALL NOT IN SUMMARY BE TAKEN AWAY. Respondent has NO APPEALIST penalty of perjury, personal knowledge MUST CONCLUDE, UNDER PROSECUREMENT MUST BE DONE. Beysin v. Coughlin U.S.C.A. 2nd Circuit (186) 4:2d 676, 789. <sup>(186)</sup> <sub>4:2d 676, 789</sub> Johnston witness. Also True Forum T.C. Court of Appeals Law COMMANDER. ORORA VIANDICATION for Mr. Abram D. Brantley and Family. This is Access.. Due Process.

THE STATE OF SOUTH CAROLINA  
In THE COURT OF APPEALS

APPEAL FROM RICHMOND COUNTY  
Administrative Law Court

Sebastian Phillip Lenski

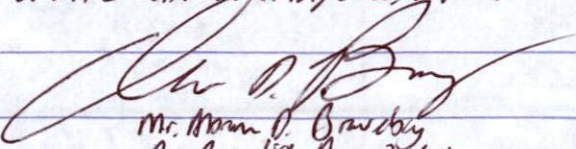
Case No. 2025-000715

STATE OF SOUTH CAROLINA Respondent  
Abram D. Braseby v. Appellant

Proof of Service

I certify that I have served the "Motion for PRELIMINARY INTERVIEW S.C. Civil Rule 65/Summary Judgment S.C. Civil Rule 56." By depositing a copy of it in the United States mail, postage pre-paid 9-16-25, addressed Administrative Law Court Edge A. Down Building 1205 Paulkston Street, Suite 224 Columbia S.C. 29204, S.C. Court of Appeals Jerry BOBOT KIRCHENOS Clerk P.O. Box 11624 Columbia S.C. 29211, Office of GENERAL COUNSEL Christopher L. Byrd Esq. P.O. Box 21717 Columbia S.C. 29221-1787

9-16-25  
DATE

  
Mr. Abram D. Braseby  
P.O. Box 189 Fern 2-5-18  
Waterloo Correctional  
Rembert S.C. 29126-0189

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 Lewis

---

§ 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 LEADER Essential Evidence Affidants under  
Penalty of Perjury 28 USC 1746 personal Knowledge Attachments [1-23]<sup>A</sup> [1-9]<sup>B</sup>  
For Preliminary Injunction/Summary Judgment Article 133 S.C. Constitution  
14<sup>th</sup> Amendment U.S. Constitution Due Course and Process of Law

Norm P. Branby owner  
Wakeree Ct Room 2-5 Bldg  
Highway 261 Co. Box 189  
Rembert S.C. 2928-0180

State of South Carolina

Mr. Abram D. Brantley  
v. Appellant.

S.C. Department of Corrections  
Respondent.

S.C. Court of Appeals

Case No. 2025-000715

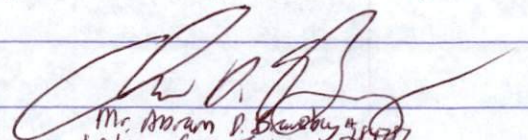
A F F I D A V I T  
(A)

I, Mr. Abram D. Brantley, declare under the penalty of perjury that 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 Frances Kirk Reference No. 25-038414+3 7:05 AM MANIPULATOR, RECEIPTS RECORD. That motion for preliminary Injunction S.C. Civil Rule 65/Summary Judgment S.C. Civil Rule 56 ALL Special Appeals Rule 60, 63. The very copy that was the Administrative Law Court S. Phillip Lenki Abstract Judgment obligation for preliminary Injunction GRANT. General counsel CONCEDE TO RETRACTION CASE. The motion sent "Disappeared" COLLUSION to obstruct with already factual October 30, 2024, General counsel agreement S.C. Beckett personell as witness. After scanned pages of Petition Barber Business to General counsel. Filed 12/20/24 (12/20/24) postage mail to Article 152 S.C. Const, 1st Amendment U.S. Const. Access to the courts GA01.03 Court Entity U.S. District Court LIABILITY mailroom Frances, Business sector Barber, Warden office Don Beckwith, AW Long, AW Wackley. Director of Operations, GENERAL COUNSEL SOUTH CAROLINA DEPARTMENT OF CORRECTIONS Entity, Unprofessionalism Deliberate Indifference, CRIST Negligence, Awareness, Foreseeable official capacity DEMAND for permanent preliminary injunction S.C. Code §15-78-70(b), §1-11-460 Attachments 1-23

Pursuant to 28 USC §1746, I declare under the penalty of perjury that the foregoing is TRUE

6/17/25  
DATE

  
Mr. Abram D. Brantley  
Waterloo Court Inst. P.O. Box 184  
8000 Hutchinson Rd. P.O. Box 184  
Rembert SC 29126

STATE OF SOUTH CAROLINA

Mr. Abram P. Crawley

Appellant

ADMINISTRATIVE LAW COURT

CASE NO.

S.C. Department of Corrections

Respondent

"MOTION for preliminary Injunction  
S.C. Civil Rule 65/Summary Judgment  
S.C. Civil Rule 56 ALC Special Appeal  
Rule 60, 63"

AVERMENT OF THE ISSUES ON APPEAL  
[Preliminary Injunction Authoritative]

The Appellant victim masochist in mental anguish subjudice shuffling sui generis concerning Magna Culpa upon SCDC Warden personal capacity employees, Furman maximum and Exile de Se Business Barber. Establishing SC code 51-23-380 (A)(5)(c) Jurisdiction violation of the State liberty due process Article 253 S.C. Constitution 14th Amendment interest Essential LA 01-03 Access to the Courts RIGHT 11th Amendment, Article XII § 2 SC Const. App 2 12/16/24 Erroneous Decision Bonds v. Smith 430 U.S. 817, 97 S.Ct. 1491 52 L.Ed. 2d 72 (1978). 41-Subaru v. State 338 S.C. 354 376-82, 527 S.E. 2d 742 754-57 (2000) Article 1815 S.C. Constitution 9th Amendment US Const. Civil Unusual punishment. The Appellant in extraordinary RARE Gross DENIAL... for... POSTAGE MAIL Fall, Ji Ma Verba "HANDWRITTEN PETITION" Barber while conducting a congressional 18 WC 53771 criminal victim Right Act procedure from 12/1/23 until present day. Warden Debra with warden entire OVERSEER staff along with the MW opposition Actual Ally General Counsel AUTHORIZED MANDATORY CWA Mandator phone call supervisor case manager Tony Webb (804)-916-2702 US Court of Appeals 4th Circuit Witness General Counsel themselves, excluding whom ever gave authority to conspire against postage according to Mr. Barber for "HANDWRITTEN PETITION" 10/30/24 Barber while Appellant under duress retrieve first pages of petition sent to General Counsel. Essential Oklahoma Attachments of evidence genuine material fact under penalty of PERJURY personal knowledge. Nine number North electronic Request Reference sheet about 12-30-21 Inmate Request quote to Business sector Barber 18 WC 51201. This Appellate procedure DEMAND Civil Rule 65 IMMEDIATE preliminary INSTRUCTION Compton v. JCC 302 SC 361, 704 S.E. 639 5/2/11. Axiom Civil Rule 56 Structure Abstract ASSOCIATION without General Counsel consent when agreed with supremacy Clause Article VI Sec (2) procedure legally lawfully CWA And then premeditated unlawfully conspire with Business sector 515-78-20(h) Mr. Barber 42 WC 52000 dd-0 (1)(2) 10/30/24 Warden office full mailroom. Summary Judgment MUST BE ENFORCED for App 1 Ground ACTION REQUEST REDIRECT GRANT JCC ADM th.04 corrective ACTION 44.2 444. 000 unprofessional conduct, unethical conduct 040 negligence in carrying out professionalism 130 without misconduct Intentional Improper Behavior without warden disregard 120 Institutionalizing failure to be cooperative with supervisor. The victim Appellant must should NEVER BE PERJURED to send his mother by General mail actual Legal MAIL piling 01-03 hit the court entry US District Court EVER AGAIN JUST for postage. Appendix 1 Address. Injunctive decision substantial evidence of Elementary Law. Equals perspective Depose Irreparable harm if NO preliminary Injunction is included NO appeal can be done by respondent extraordinary Injunction warranted, Official capacity now immune. Egregious Denial S.C. code § 24-1-220 by 100,000.00 Negligence Deliberate Indifference SA ALC Rule 56 Necessary proper for Justice. ALC Decision CANNOT BE overturned Respondent that NO substantial EVIDENCE is controlled by some Error of Law. SC code 51-23-610.

## AVERTMENT OF THE CASE

The Appellant victim (Inmate Plaintiff), from circa November 30, 2023 6:35 pm Morning the Release Center has been pending in a CRIMINAL VICTIM RIGHTS HABEAS CORPUS PROCEDURE, CONGRESSIONAL LAW 18 USC § 3771. SINCE April 6, 2024 Administrative Transfer to Wallace Corr. Institution. Manifest arrival the difficulty with simple state and Federal Elementary procedure has been continuously hindered, impeded by unprofessional Actions employee Furman malroom. See U.S. Court of Appeals 28 USC § 457 record. Kiash self not within Body. And the business tech since arrival Mr. Barber being in conspiracy maliciously to execute improperly 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 UNLAWFUL NEGLIGENT DENIAL OF MANDATORY ACCESS TO THE COURTS JUDGE policy STATE liberty Essential Right Constitutional Article 1 & 2, 3 J.C. constitutional, 14<sup>th</sup>, 14<sup>th</sup> Amendment Due Process. After Furman Denial of Postage PT. 10.08 16.1, 11.1.1, GA 01.03 16 16.1 for "LEGAL MAIL" Debit 10-14 JUDGE Form once again Business Tech Barber called upon to violate violation. Mr. Barber upon agreement of policy pertaining to postage went another FALLACY REASON to DENYING Appellant access. Petition CANNOT BE "HANDWRITTEN". IN THICK THE APPELLANT WAS TOLD to give documents of petition to Mr. Barber for SCANNING TO AUTHORIZED RECORD CENTER FOR U.S. COURT OF APPEALS Superior CASE MANAGER Phone call Tony Webb (804-946-2700). To JUDGE GENERAL COUNSEL, GENERAL COUNSEL according to Mr. Barber MUST RECEIVE documents for "CLEARANCE" to mail Imperative Court ORDERED JUDGE policy congressional, Legislative state constitutional Article 1 & 24 Appendix. Admitted Entry Petition. The Appellant in Emotional Distress, Anguish being WIDENED quoted 18 USC § 1701 complied. The officer within Room 2 would be Belvert gave reply from GENERAL COUNSEL. On October 30, 2024, in conspiracy the Appellant received an NO from ANONYMOUS shadow Co Sienter of General Counsel. November 18, 2024, the Appellant had to fend through GENERAL MAIL U.S. 11 (see Warden's response step 1) his petition to his mother Dorothy Bugels just to get the ordered documents to the U.S. District Court Greenville J.C. he didn't have necessary funds prior due to malicious conspiracy-

NO 16-14 Form WFE, Base shaking 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. WFE-0150-24 stamped filed. Warden Beckwith who visited Girhart WRA Appellant in prison on 11-25-24 sided with conspiracy. On 11/25/24 Haste step 2 Grievance was entered stamped 11/24/24. On 12-18-24 official capacity Deputy Director of Operations signature NOT legible colluded with atrocious guilt, signed by Appellant 1-4-25 for Justice 1-12-25 Notice of Appeal Do NOT PERMIT 3rd Fallacy Release.

Structure & Review

Administrative Law court Civil Rule 65 preliminary Injunction. The structure of General Issue of material fact that cannot be resolved (2021 Rule 56(c)), Summary Judgment MUST BE AWARDED due to Ledger-Record within General Counsel Keith Edwards as well as Warden's office with free correspondence for 18 W/2 15771 Article 1524 DC with WRA Legal procedure that was BOTTERED. Such JURISDICTION IS NOT AUTHORIZED I special Appeal Rule 60 (B)(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, depositions answers to interrogatories and admissions on file together with affidavits "If any" which the moving party believes demonstrate the absence of genuine issue of material fact. Anderson v Liberty Lobby, Inc. 461 U.S. 274 (1983), Woodson v. R.C. Properties, LLC 400 F.3d 117, 753 F.2d 928 (2004), Rule 56(c) SCALD 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, moreover only disputes over facts that might affect the outcome of the case under the governing law will properly preclude the entry of Summary Judgment, immaterial 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 triable issues of fact exist the court must weigh the evidence and all reasonable inferences that may be drawn from the evidence in light most favorable to the non-moving party Martin v. New York, 501 U.S. 496, 111 S.Ct. 2044 (1991); Lock v. East Tennessee Inc. 407 F.3d 544, 257 S.W.2d 657 (T.C. 2009) Inmate while the burden of the non-moving party is to be believed, and all justifiable inferences must be drawn in the non-movants favor, a party cannot create a genuine dispute of material facts through mere speculation or computation of inferences. Reas v. CDF Trans, 112 F.3d 326 (4th Cir. 1997) Beaton 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. M2D South Mint Co. 311 F.3d 326, 473 F.2d 801 (T.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. Lorham v. Blue Cross Blue Shield, 344 F.3d 375, 383, 386, 387 (2002) Summary judgment is a drastic remedy it should be cautiously invoked to entitle a party, or not improperly deprived of a trial on disputed factual issues Medlin ex Cel. Bryant v. Ciba-Geigy, Inc. 371 F.2d 123, 136 F.2d 650 (6th Cir. 1962). To decide if a jury could return a verdict in the non-movants favor, there is a genuine issue of material fact to dispute which requires a trial Anderson supra at 2507. Likewise the threshold question for the court during this stage is whether the evidence is so ~~over~~ one-sided that one party must prevail as a matter of law. Hurrell v. Hurrell, 236 F.3d 526 (M.D. N.C. 2000) initially serious, Rule 56(c) FRCP provides that when a motion for Summary Judgment is made and supported by full, an adverse party may not rest upon the mere allegations or denials of the pleading, but must [respond] by affidavits or as otherwise provided in this rule must set forth specific facts showing that there is a genuine issue for trial. If s/he does not so respond Summary Judgment if appropriate shall be entered against him. Celotex Corp. v. Catrett 463 U.S. 254 (1983).

IT IS GENUINE MATERIAL FACT THE VICTIM APPELLANT HAS BEEN AND CONTINUES TO BE IN ALLIANCE WITH APPELEE RESPONDENT U.S. GENERAL COUNSEL CONCERNING THE CRIMINAL WRIT RIGHT ACT PROCEDURE 18 USC 3771, ARTICLE I § 24 J.C. CONSTITUTION SHUT W/ST FRODOLO BY WALTER WELLS OFFICE GENERAL COUNSEL OFFICE RECORD KIOSK REQUEST LEDGER PRIOR TO JUDICIAL ACCESS TO THE COURT CA 01.03 SUPP B/ING, PRELIMINARY INTENTION CANNOT BE REFUSED

branch of which the law gives a remedy or the performance of which the law in some way recognized as a duty in law does in fact attach legal obligation. - Black Law Dictionary

This exceptional circumstance of "CONTRACT" between the ILLUSION of contract due to deliberate malicious Indifferent conspiracy JUDGE Walter employees minimum Furnon, Business/Burke including to the universal sense of Justice to have a Mandatory Federal, state adopted legal procedure for legal phone call to CASE Supervisor MANAGER Tony Webb, U.S. Court of Appeals 18 USC § 3771 Rule 21(d) for Required Policy.

Itu Lex scripta est,

or A Petition for Writ of Mandamus asserting the rights of a crime victim pursuant to 18 USC § 3771(d)(3) shall bear the caption "PETITION FOR WRIT OF MANDAMUS pursuant to 18 USC § 3771 crime victims RIGHT." Refuse 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 (800-966-2700). 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

IMPERATIVE LEDGER KIOSK REQUEST GENERAL COUNSEL WARDEN BECKWITH CONTENT 6-18-24 thru 10/30/24 FOR LEGAL PROCEDURE ADHERENCE GUEST PELLUCID AUTHORIZED AGREEMENT CONTRACT FOR DUE PROCESS PETITION REGARDLESS OF "HANDWRITTEN" STATE OR NOT, GENERAL COUNSEL HAS NO CONTROVERT PERTAINING TO PROCEDURE that began at Manning P/c Release Center. Essential

EVIDENCE pending MIT VERY DAY ZUFKA LIABILITY KIOSK REFERENCE RECORD

Manning P/c Release	Ref No. 23-03324602	mail	11/30/23	6:35 PM	12/17/23	Author (020470)	Response 12:33 PM 12/20/23	9:10 AM
	Ref No. 23-03346868	mail	12/29/23	12:06 AM				
	Ref No. 24-03355674	mail	1/3/24	9:16 AM	1/4/24		11:05 AM	
	Ref No. 24-03381612	mail	1/25/24	9:42 AM	1/26/24	Author (066084)		
	Ref No. 24-03380541	mail	1/24/24	10:10 PM	1/25/24		9:41 AM	
	Ref No. 24-03410204	mail	2/20/24	9:51 PM	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. 24-03412246	mail	2/23/24	7:04 AM	2/23/24		1:58 PM	
	Ref No. 24-03523654	mail	5/24/24	2:14 PM	5/30/24		10:24 AM	
	Ref No. 24-03513757	mail	5/20/24	1:07 PM	5/21/24		2:30 PM	

11:22 AM Ref No. 24-03536351 (Check 6/10/24 "CA-01.03 ACCESS to the COURT to Walter IT W/ST CONCLUSION OPERATIONS/PROCEDURE US COURT OF APPEALS FOR 4th CIRCUIT Rule 21(d) Petition for Writ of Mandamus pursuant to 18 USC § 3771 crime victim rights Supremacy Clause II section 24 Access to the court due course and present of law per Amendment Before PLEASE 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 (800-966-2700). Their authority is for scheduling such mandatory phone call according to Open Action. Clearance with the initiation MUST BE DONE, 28 USC § 1776, 1777, and 1778. RESPECTFULLY SUBMITTED PRO TO ON AMENDMENT PROHIBIT PETITION.

RESPONSE DATE 6/17/24 8:39 PM AUTHOR (027588) "NOTIFIED THE WARDEN THAT YOU ARE WORKING FOR A LEGAL CALL IN THE FUTURE WITH YOUR OWN LIT"

REF NO. 24-03545753 PROSECUTOR 6/18/24 8:55 AM

"WARDEN BECKWITH, NERVOUS LEGAL 24-03545753"

6-17-24 3:39 PM AUTHOR 027588 SPEAKED TO YOU ON 6/17/24 CONCERNING 6/17/24 CONDUCTING 6/17/24 BASED TO THE BY YOUR AUTHORITY WAS GIVEN INSTRUCTIONS TO SEND THE REQUEST FOR COURT PHONE CALL TO PROCEED COURT THE FURNISH US COURT OF APPEALS IF WC 3711 CURA, OVER PROVISION IT REPLY 2 APPROPRIATE WITH YOUR COR BLESSED (AUTHOR) 064964 your inclusion further matter

REF NO. 24-03547654 LEGAL 6/19/24 9:39 AM

"TO WARDEN Beckwith 9:40 am 6-18-24 (24-03545753)"

author (064704) Nexus imperative appeal for ga 01.03 Appeal to the courts pro se capacity 6th Amendment, Phone call for info permanent victim right act if WC 3711, Unit of Maximum See on Westlaw 4th Circuit court of appeals rule an extraordinary writ if WC 3711 CURA, US COURT OF APPEALS 4th CIRCUIT 1100 E. MAIN STREET RICHMOND VA 23219 PHONE NO. (804)-466-2700 Work of US COURT OF APPEALS (Don't know name) Truly appreciate your assistance in this matter, THAT extraordinary writ having good cause shown is granted to the Department of Justice Hearsclough 24 WC 62254 Thank you again for your help 6/14/24 3:20 PM Author (027588) All Day

Who are you asking to call?

REF NO. 24-03549451 LEGAL 6/20/24 12:08 PM "Warden Beckwith 6-19-24 1:30 PM LEGAL 24-03547654 (027588) Author Nexus AUTHORITY TO ATTORNEY OVERSEER PHONE CALL FOR HARRIS CURA PROCEED WC COURT OF APPEALS IF WC 3711 CURA PROSECUTOR JAMES J. THE VORBA WHO ARE YOU ASKING TO CALL? WRITER PLEASE BE ATTENTIVE I DO NOT KNOW THE ACTUAL CLERK NAME OF THE US COURT OF APPEALS 4th Circuit THE CLERK WILL BE RECALLED, HE OR SHE WILL CONDUCT THE NECESSARY PROCEDURE SUPRA, THE CLERK HAS AUTHORITY UNDER STATUTE TO MAKE SURE THAT IDENTITIVE CONTENT OF LAW WILL BECOME MYSELF BEING A VICTIM "THE DEPARTMENT OF JUSTICE WOULD INVOLVE PEOPLE WOULD GET INCARCERATED THAT AT VERY IMPORTANT PROGRAM, GA 01.03 Appeal TO THE COURT, COMPARTMENT IF WC 3711(371) could be given, THE LANGUAGE OF STATUTE IS WC 3711 RECOMMENDATION FOR VICTIMIZATION OF ONE PROTECT PLEASE WITH DEFERENCE SEE THAT THAT PROCEDURE WILL HAPPEN AGAIN YOU CAN CONFIRM THE CLERK NAME WITH THE SUPRA PHONE NUMBER MOST LIKELY THEY WANT TO PROVIDE SUCH INFORMATION DUE TO THE GRAVITY OF THE CIRCUMSTANCE. THANK YOU FOR YOUR TIME. PT. AGAIN THE CLERK OF COURT I WANT KNOW THE NAME. PLEASE FORWARD TO LEGAL WOULD BE MORE,

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

RESPONSE 7/3/24 9:30 AM Author (027588)

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

7/1/24 8:14 PM Author (027588)

you will need to address your concerns at the institutional level

REF NO. 24-03577277 VISITATION 7/15/24 11:29 AM LEGAL

7/10/24 11:30 AM Author (064964)

Good afternoon This has been addressed and should not happen again Warden Don Beckwith/leg

REF NO. 24-03546326 MAIL 7/30/24 12:17 PM

8/13/24 3:00 pm?

REF NO. 24-03591998 MAIL 7/30/24 8:37 PM

8/13/24 3:00 pm

REF NO. 24-03586326 MAIL 7/30/24 12:17 PM

8/13/24 3:00 pm

The document is "FACTUAL RECORD" FOR "HANDWRITTEN PARTITION" PROCEDURE, though "ACTION REQUESTED STEPS CONCERNING Remedy was PARTICULARLY DENIED (2VEL RULE 65 structure 56(c)) WILL BE GRANTED, HINDERANCE due to essential has been REMOVED.

ubi aliquis impeditur propter unum, eo remota, do hinc impeditur. 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

JUSTICE MUST BE DONE

SEE Appendix Affidavit No. 1

It is Genuine Issue of material fact Appalling Bonds VIOLATION exists pulsating  
malefaction of State liberty RIGHT INTEREST due Protest against JDC policy Remot of US Mail  
Postage to POLICY APPENDIX United States District Court for "HANDWRITTEN WRITTEN" Petition  
Conspiracy to commit MISDEAMOUR TURPI TURE Barber Business Sector Employee Wabesee Cor. Inst.  
Extraordinary PRELIMINARY INJUNCTION, Summary JUDGMENT MUST BE GRANTED, under the  
Governing Law.

Impossible, Improbable that an Appellant can have PLENARY Action Request Step 1 Grievance  
Authority Redress CERTIFIED. By the very CONTRACT, BOND, COVENANT IN ABSOLUTE AGREEMENT...  
WITH "ADVERSARY." Appellee by title DC official General Counsel MIRACLE from Wabesee Correctional  
Institution employees aided, assisted abided by Governing Law Federal congressional State of DC  
Statutory constitutional Due course. On June 17, 2026, Before Associate Warden Long, Winkley and  
Warden Beckwith in person DIRECT TANGIBLE PRESENCE. The Assistance from Essential beyond  
substantial Evidence "Work Record Reference," to obtain such COLLOQUY, IS GENUINE EX  
ONITION FOR PRELIMINARY INJUNCTION 18 USC § 3771 Rule 2(d) WRIT of Habeas Corpus  
AGREEMENT. *Ipse Dixit* Ma Verba WE MUST SEND GENERAL COUNSEL THIS REQUEST... The  
Appellant in title for FALLACY REASON LOGIC Reports Warden Beckwith agreed... "We MUST  
SEND GENERAL COUNSEL THIS REQUEST. A PHONE CALL TO THE US COURT OF APPEALS CLERK  
for case manager assignment assistance. The Appellant at the time was preparing according  
to LAW if necessary parking in US District Court Alexandria VA. for his Writ of Habeas Corpus  
COURT petition Criminal Victim Rights Act. The DC General Counsel GAVE HIS AGREEMENT  
CONTRACT, BOND, COVENANT ABSOLUTE GUARANTEED by approving transmitting authority for  
such Legal ARTICLES 18 USC (2) Supremacy Clause PROCEDURE and NOT committing §16-9-340  
D.C. obstruction offense NOT VIOLATING US MAIL ACCESS to the courts Department of Corrections  
D.C. policy. NOT BREACHING Pt. 16.08 mail Postage. The APPELLANT WITHIN GENERAL COUNSEL  
LEDGER KNOWS Grievant NOT APPELLANT SPEAKS NO PERSEVERE, SPURIOUS IS NOT the 14th Amendment right  
liberty of FAITH by the APPELLANT. NOTHING BY the Grievant Actual Damage State liberty Right Tortman.  
It a muddle up waste mockery of the courts TIME. IF, JUST AS ALREADY UPON STEP 1 GRIEVANCE Response  
Warden Beckwith... FALLACY. Upon Step 2 Grievance IRRESPONSIBLE DIRECTOR OFFICE Response... FALLACY. JUST  
IF the General Counsel DECIDES THAT the Warden's office DID NOT GET THEIR CONSENT. THAT FORTUITOUS  
GENUINE MATERIAL FACT RESISTANT PROOF FOR PRELIMINARY

INJUNCTION EVIDENCE. HAS NOT MADE The Circuit Step 1 decision and modified Supplement official capacity CA 01.12, 10.2, 10.5 Monetary Damages ADMINISTRATIVE LAW AUTHORIZATIVE PLEA. The General counsel Representative or Trustee can see to it that the inmate without Circuit Appellant be Released and add him to the Staff to conduct TRUE legal lawful procedure; on their behalf. For there is an ACCOMPLICE, the court CANNOT comply, with an LEGAL SUBTERFUGE TREACHERY. SEE Appendix Affidavit No. 1 and 2

There is NO WAY, CRITICAL BECAUSE COGNITIVE Thinking as Bar members professing to be Jurist Competent as Legal Entity GENERAL COUNSEL can SEE with October 30, 2024 "Perdition." Access TO THE AUTHORIZATIVE FACTUALLY KNOWN COVENANT "WE ARE WITH YOU," IN COURT OF APPEALS. HANDWRITTEN or TYPE IT DOES NOT MATTER. PETITION. The Park Pair Themselves, MUST NOT GIVE CONSPIRACY MANIFESTATION by "Notice of Appeal" Language "FALLACY" NO. 3 FORFEIT. To defend minroom Furner, Business sector Barber, personal capacity, under Beckwith, official capacity RESPONSIBLE DIRECTOR OFFICE operation. With Yet we have RECORD EVIDENCE OF CONTENT. But... We must feel DEFEAT in ARTIFICE. SEE Appendix AFFIDAVIT NO. 1 and NO. 2 AGAIN Remember on October 30, 2024, Justice Barber [movement of case] after victim, Lehman, grant, Appellant quoted 18 USC § 1701 (Especially since ROJ. ATGDC with Col. J.C. McHale) "SCHEDULE" Initial FIRST HANDWRITTEN paper to "General counsel." See Appendix Affidavit No. 2 An unknown Master ACCOMPLICE gave consent to VIOLATE Access to the courts when time lapse for scheme throughout Business sector Barber with whom. Corporal Beckett Handwritten NOTE after phone call to or from Barber League to 316-17-410 include after 400 days and counting worth of Evidence now incontrovertible DEFRAUD SEE Appendix Affidavit No. 2

Convincing material fact USAM, BUTTERWORTH NO ISSUE This case Prima Facie Subjustice MUST BE SETTLED DISPOSE of the Bowles v. Robin 480 US 97, 97 S.Ct. 1491 52 L.Ed.2d 72 (1978) PRECEDENT REMOVED. There is NO SUSTAINMENT OF DEFENSE for J.C. GENERAL COUNSEL the ONLY in PARTIAL Bond Kite CONTEXT. The Hon Track Locomotive of Justice has NOT RECEIVED PROPER minimum

Personal Mr. Furman, Business Sector Barber, personal capacity Warden Beckwith,  
 Official capacity IRRESPONSIBLE DIRECTOR OFFICE OPERATION, CANNOT Respond Grievance No.  
 WRCEI-0150-24 Stamped 11/4/24 Action Requested IRON CLAD. ALL PATIENTS WERE SENT  
 ROOM 1204 unprofessional 020, NEGLIGENCE in carrying out professionalism 040, Willful  
 Intentional Improper work in discharge 170. FAILED to cooperate with law/policy abiding  
 Superior. From a \$3.00 amount few dollars short to can't use 10-14 debit form to car, then can't because  
 HANDWRITTEN Petition criminal offense equals L I A B I L I T Y

The step 1 Grievance for the Grievant has Always BEEN a CERTIFICATE. TENABLE TORT  
 Administrative Debt instrument Gift. Mailroom Furman foreseeability compensation \$5,000, punitive  
 \$250.00. Tort Cause Business Sector Barber compensation \$10,000 punitive \$500.00 Due to Reasonable S.C.  
 Against employment periodic payments every three months Initial \$1,000.00 after \$500.00 until  
 SOLVENT FINANCIALITY. Personal Capacity Warden Beckwith Initial \$3,000.00 after \$500.00 infra  
 Upon South Carolina Department of corrections INMATE GRIEVANCE Form STEP 2 11/24/24

Filed Stamped unknown now legible signature Deputy Director office of Operation OFFICIAL CAPACITY  
 DUE to lay person cognitive elementary guilt upon subordinates Essential Evidence SEE Appendix Affidavit  
 1 and 2. Director office DID NOT glance at the Adjudicative Electronic, manual Record for JUSTICE  
 FORESEEABLE. COMPENSATIONS \$ 100,000.00 Punitive \$25,000.00 Initial aggregate  
 ONE HUNDRED THOUSAND DOLLARS TWENTY FIVE THOUSAND DOLLARS

The Grievant VICTIM'S MOTHER Dorothy Burgess had to send the legal mail US POSTAGE  
 paid \$11.40 priority mail USPS Tracking # 9505 5117 6078 4335 8644 50. To the Appendix  
 listed GA 07.03 US District Court Entity. Director office DID NOT EVEN CALL US COURT OF APPEALS  
 to confirm "HANDWRITTEN PETITION" OBLIGATION Superior case manager Tony Webb phone no  
 (874)-916-2700 upon STEP 2 Grievance with quoted WRCEI 1701, (1702) obstruction of mails generally.

Warden Beckwith's Knowledge experience with case his responsibility as the institutional  
 Authority affecting overall mental state health, Anguish stress S.C. Code § 15-75-70(h) Deliberate Indifference.  
 Also for family being victimize supra foreseeable compensation \$25,000.00 punitive \$5,000.00 One  
 probandi Met Personal capacity after 50% of debt paid can apply for Release of obligation  
 Twenty five THOUSAND DOLLARS FIVE THOUSAND DOLLARS

## CONCLUSION

When Samuel Williston spoke ledger as "Treatise on the law of CONTRACT, He DID NOT ENVISION a CORPORATION who has Agents employees under POLICY who TO NOT "perform" the Elementary tools of PARAMOUNT Legal Access to the courts. To have Knowledge of an Authoritative Federal 10<sup>th</sup> Amendment Article 1<sup>st</sup> 2<sup>nd</sup> U.S. constitution Petition Criminal VICTIM RIGHTS ACT procedure. The entire Warden Waterse staff Long, Whitley, and Beckwith received Clearance from the Attorney for members GENERAL COUNSEL who CANNOT EVEN PARTIAL a Defense because by RECORD ESSENTIALLY... Their part of the Appellants legal staff. Civil Rule 65 preliminary Injunction is Extraordinary. These facts law properly executed are exceptional To prevent POSTAGE "HANDWRITTEN PETITION" wound, of Any NOCIOUS Agent from repeating such caricature Defiant violations. Punitive Damages, MUST take place mailroom Furman, and Business/Financial sector Barber supra official capacity Irresponsible Deputy Director office operations. Grievant has concrete his case to the only John Redress. Appellant is Grievant state liberty RIGHT has been ANNIHILATED... INJUNCTION is favor, for BOND CONTRACT obligation DEMANDS IT. JUSTICE. Due process will NOT BE DENIED AGAIN.

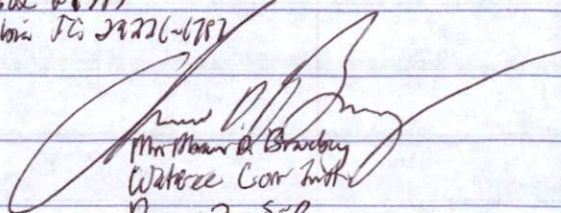
### proof of Service

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 ALC special Appeal Rule 69, 63" to infra by depositing a copy of it in the United States mail, postage prepaid, on 2/21/25

Administrative Law Court  
1205 Pendleton Street  
Suite 224 Columbia SC 29201

and

Office of General Counsel  
4144 Broad River Rd  
P.O. Box 21777  
Columbia SC 29221-6777

  
Mr. Abram D. Brueby  
Waterse Cor Int'l  
Room 2-5-B  
Pendleton St 29128

General Counsel Respondent in Alter Ego Motion side, CANNOT PRECLUDE Preliminary Injunction, from being Enforced. General Counsel Respondent CANNOT OBTAIN Abstract Ruling as Doppelganger Adversary having NO modicum, Trial, or mitigate Defense 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 Exorcism Policy/Law criminal offense Gross Wanton Denial Access to the courts, to the other without *scu potestas* Affecting authoritative officials. Culpable will be the term 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 404 F.2d 986 May 2, 1986 SEE Appendix Affidavit NO. 1 and NO. 2 with Attachments d-10

There will be NO Special Appeals ALC Rule 60. REPLY BRIEF IF GENERAL COUNSEL DECIDES TO COMMIT PERJURY 28 USC § 1746, S.C. Code § 16-9-10. Substantive RIGHTS of the ~~Respondent~~ <sup>Appellant</sup> 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  
afflicted by other error of law

Clearly erroneous in VIEW of the reliable, probative, and  
substantial evidence on the Whole Record

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

ADMINISTRATIVE LAW COURT

11

SA Rule 60 (c)

A P P E N D I X

L E N S K I

WRC I 0150 - 24

Entry within COURT LEDGER ESSENTIAL EVIDENCE Affidavits under  
Penalty of perjury 25 WRC 51746 personal knowledge Attachments (1-10)  
For Preliminary INJUNCTION/Summary Judgment Article I § 3 U.S. Constitution  
14th Amendment U.S. Constitution Due Course and Process of Law

AFFIDAVIT

No. 1 and No. 2

ATTACHMENTS

(1 - 10)

Abram D. Braubey 254757  
Wadree Ct. Dum 2-S B side  
Highway 261 P.O. Box 189  
Rankist S.C. 29125-0189

State of South Carolina

Mr. Abram D. Braveboy

Appellant,

v.

S.C. Department of Corrections

Respondent.

ADMINISTRATIVE LAW COURT  
CASE NO. WRCR 0150-24

AFFIDAVIT  
NO. 1

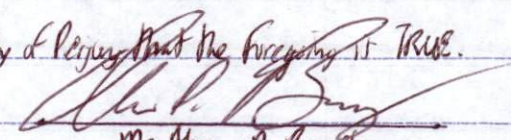
I Mr. Abram D. Braveboy declare under the penalty of perjury, I am the Appellant in this hereto captioned case with personal knowledge of the facts, and being competent to testify, I submit this affidavit to support my motion for Preliminary Injunction / Summary Judgment. **INFRA LIABILITY MISC REFERENCE ESSENTIAL EVIDENCE RECORD**

- Manning P2 Release Ref No. 23-03524007 mail 11/30/23 6:38 AM, 12/17/23 (202472) <sup>Author</sup> Response 12:23 PM 12/22/23 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 1/25/24 9:42 PM 1/26/24 <sup>Author</sup> (066089)
- Ref No. 24-03380341 mail 1/27/24 10:10 PM 1/28/24 9:41 AM
- Ref No. 24-03410204 mail 2/20/24 9:51 AM 2/21/24 9:41 AM
- Ref No. 24-03415754 mail 2/21/24 8:02 AM 2/27/24 1:36 PM
- Ref No. 24-03412446 mail 2/23/24 7:06 AM 2/27/24 1:35 PM
- Ref No. 24-03503659 mail 5/29/24 2:19 PM 5/30/24 10:29 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 3:39 PM
- Ref No. 24-03541753 PROSECUTOR 6/18/24 8:15 AM
- Ref No. 24-03547651 LEGAL 6/19/24 9:59 AM 6/19/24 3:20 PM
- Ref No. 24-03549458 LEGAL 6/20/24 12:08 PM
- Ref No. 24-03564850 LEGAL 7/2/24 8:27 PM 7/3/24 9:30 AM <sup>Author</sup> (02758)
- Ref No. 24-03566072 LEGAL 7/4/24 10:42 AM 7/5/24 8:14 PM <sup>Author</sup> (02788)
- Ref No. 24-03577797 notation 7/15/24 11:29 AM 7/15/24 1:35 PM <sup>Author</sup> (064967)
- Ref No. 24-03596326 MAIL 7/30/24 12:17 PM 8/13/24 3:00 PM
- Ref No. 24-03596995 MAIL 7/30/24 8:57 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 MISC REQUEST  
UNTIL 10/30/24 GRANTOR FOR CROSS WAIVER NEGLIGENCE  
DENIAL ACCESS TO THE COURTS

This Essential EVIDENCE MANIFESTS COOPERATION ALLIANCE Wadswell Corr. Warden's office Associates Long, Wadswell, and Superior Beckwith, Lt Dingle, Captain David GENERAL COUNSEL as witnesses. 18 WCR 3771 Criminal victim Rights Act CONTRACT TO EXECUTE SCDL Policy GA 01.03 and PT 10.05 due Process for the behalf of victim Abram D. Braveboy. Preliminary INJUNCTION Rule 65 / Summary Judgment Rule 56 MUST BE ENFORCED.

Pursuant to 25 WCR §1746, I declare under the penalty of perjury that the foregoing is TRUE.  
2/27/25  
DATE

  
Mr. Abram D. Braveboy  
Wadswell Corr. Inst. Farm 2 Rm 5  
8200 Wadswell Rd. P.O. Box 189  
Rembert S.C. 29128

State of South Carolina

ADMINISTRATIVE LAW COURT  
CASE NO. WRCI 0150-24

Mr. Abram D. Braueby  
Appellant,

v.

AFFIDAVIT  
NO. 2

S.C. Department of Corrections  
Respondent.

I Mr. Abram D. Braueby declare under the penalty of perjury, I am the Appellant in this here to 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.

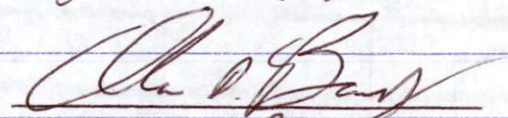
1) After Heinous Act Conspiracy mailroom furman Business/financial sector Barber quote CANNOT forward postage mail due to "HANDWRITTEN PETITION" the under duress victim gave Democrat first paper of petition to SCAN for another Colony reach printing for already 11/30/23 - present CONSENT GENERAL COUNSEL EXISTENCY OFFICE 18 WCS 3711 CURA procedure. On October 30, 2024, Byrd just denial Access to the courts. Already talking with Supervisor Tony Webb October 15, 2024 (804)-416-2702, U.S. Court of Appeals order to send U.S. District Court Murchamus Petrus. Due to NO access to Electronic Kiosk REQUEST to forward to Warden Beckwith Immediately the victim did an original 19-11 SDC Form Request to Staff Asking for another phone call. Due to permit of PUTBACK via mail Reason CANNOT SEND Petition because of "HANDWRITTEN" U.S. Court of Appeals' order was shown to responsible jailer Mr. Barber Business Denied CA 0103 Access to the courts and PS 10.08 11.1 "AT THE TOP RIGHT HAND CORNER THE VERY CERTIFIED OFFICIAL RECEIVED GENERAL COUNSEL CHECK NOVEMBER 6, 2024 STAMP. Preliminary INJUNCTION MUST BE DONE IN APPELLANT'S PAKOK REQUEST solidified. Attachments A-5

2) On July 16, 2024, after numerous infractions by mailroom furman, for some "Deliberate Indifference" discriminatory reason, NO stamps on 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 VA, 23219, concerning his legal proceadure, Notice to Appeal forma Pauper's 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 Kiosk Request System on his Assigned Tablet Mr. Barber Business Sector Authority has that particular function. On August 14, 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 LTL Tablet/Printer Trouble shoot. INCLUDE the MAC # NOT THE IPZ or IPV. On August 30, 2024, stamped September 11, 2024, the victim sent again a request to Barber for Electronic Kiosk Request access. On 9/11/24 Barber quote I DO NOT UNDERSTAND what you are asking for. Please Re-word your Request to better explain your Question. Inching, only to have access once you gave 10/30/24 was submitted about Access Denial Access to the courts. Attachment A-9

3) On October 30, 2024, immediate After Grant Warden Denial of Access to the courts from Barber again because of "HANDWRITTEN" 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 DEFENSE Civil Rule 65 Judgment GUARANTEED. FOR THE Appellant Grant state liberty Right violating victim. Warden Staff Captain David of witnesses. Two documents that get scanned for General Counsel pre-legal clearance for postage mailing on 10/30/24. L I A B I L I T Y P E L L U C T O see page 5 of Memo/motion Attachments 10-

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

2/25/25  
DATE

  
Mr. Abram D. Braueby #289287  
Wakaree Corr Inst Form 2 Rm 5  
8200 State Farm Rd. P.O. Box 189  
Rambert S.C. 29128

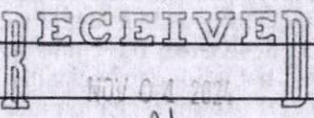
SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

14

INMATE GRIEVANCE FORM

INMATE COPY

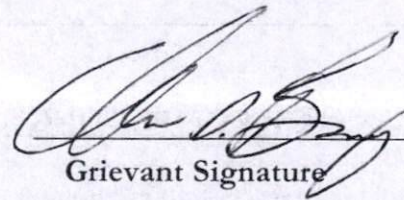
STEP 1

INMATE NAME: <u>Mr. Abram D. Bowberry</u>		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.)

GA 01.12, 13.3 necessary info,

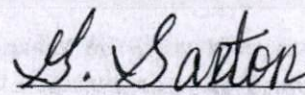
The Grievant avers, on 10/29/24 Mr. Furman mailroom personnel was not CLEAR concerning SCDC policy "LEGAL" correspondence to "EMERGENCY" U.S. District Court. According to Furman there was a need for Mr. Barber "Business" to Authorize FELLOW Inmate Legal mail understanding Due process postage. 10/30/24 Barber DID NOT approve of Legal IMPERATIVE Federal Court ORDER AUTHORIZATION to receive postage, due to HANSON/2776W Petition. Involving violation of FEDERAL STATE liberty right and existing policy GA 01.03, 16.1, PS 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 PERMIT DUE TO COURT ORDER, 14-11 mand request NOT Attached. 10/30/24.

  
 Grievant Signature 10/30/24  
 Date

ACTION REQUESTED: Both are liable. Due to COURSE/ADVICE after displaying U.S. Court of Appeals ORDER to Mr. Barber with ONLY ONE WAY for POSTAGE mail Transfer. Quoted Federal offense 18 USC 3771 Grievant NEED IMMEDIATE INTERVENTION for mailing CLARIFICATION and THAT this does not happen again. VIOLATION CRISTALINE GA, 01.12, 10.2, 10.5 MONETARY DAMAGES for BOTH SUPRA DEFENDERS OPRESSIVE NEGLIGENCES, 57 THOUSAND FURMAN, 10 THOUSAND \$ 10,000 BARBER 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.

  
 IGC Signature 11-25-2024  
 Date

(CONTINUE ON REVERSE SIDE)

RECEIVED

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS  
INMATE GRIEVANCE FORM  
STEP 2

Due by: 11-30-2024 <sup>15</sup>

INMATE COPY

DEC 03 2024

Office Use Only

INMATE GRIEVANCE

INMATE NAME: Abram D Brandy  
SCDC NUMBER: 289787  
INSTITUTION: Waterloo ✓  
HOUSING UNIT: Perm 2  
WORK ASSIGNMENT: TA

RECEIVED  
NOV 26 2024  
BY: BA

Grievance No. WR01-0150-24  
Code: General GP/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 decision denied state inmate's essential right "Access to the courts" GA 01.03 16.1 and PS 10.08 11.1, 11.1.1. 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, 11.1.1, 10-14 Form was to be used to cover the with... "BEST" Barber (Chief to Durbin) 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, 19-11 request sent to Warden Beckwith witness due to preparation for procedure 18 USC § 3771 10/15/24 case manager Tony Webb (804)-910-2700 Kiosk Request website 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 criminal offenses 18 USC § 1701, 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

(SEE REVERSE SIDE FOR INSTRUCTIONS)

## INSTRUCTIONS FOR COMPLETING STEP 2 GRIEVANCE FORM

1. Complete form in its entirety, writing only in the space provided for inmate use.
2. State your specific reason for further appeal. Do not submit any new issues for review. No additional pages will be permitted.
3. Submit this completed form with your copy of the Step 1 form by placing in the Grievance Box within five (5) days of your receipt of the Warden's decision. Do not write in the space provided for the responsible official.
4. The decision rendered by the responsible official exhausts the appeal process of the SCDC Inmate Grievance Procedure.

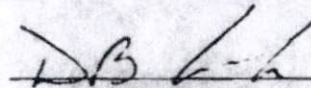
**WARDEN'S DECISION AND REASON:**  
**Braveboy, Abram - 284787**

WRCI-0150-24

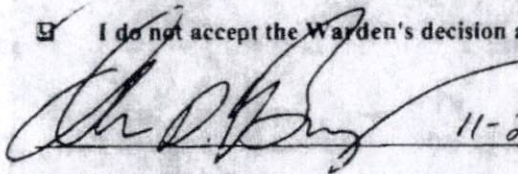
I have reviewed your concern. In your grievance you stated that on 10/29/2024, Mailroom staff was not clear on SCDC policy regarding "Legal" correspondence to "Entity" US District Court, and according to staff, there was the need for Inmate Financial to authorize legal mail, understanding due process 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.

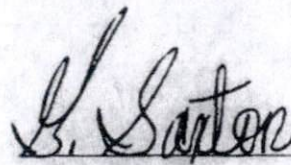
Therefore, your grievance is denied.

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.

  
Warden Signature 11-25-2024  
Date

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

  
Grievant Signature 11-25-2024  
Date

  
IGC Signature 11-25-24  
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.

2

**STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT**

Abram Braveboy, #284787,

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

Appellant,

vs.

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

South Carolina Department of Corrections,

Respondent.

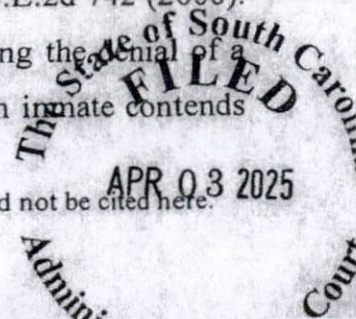
This matter is before the South Carolina Administrative Law Court (ALC or court) pursuant to a Notice of Appeal filed on January 16, 2025 by Abram Braveboy (Appellant) an inmate in the custody of the South Carolina Department of Corrections (Respondent or Department). After the Appellant's Step 1 and 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,<sup>1</sup> which typically arises in two ways: (1) when an inmate contends

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



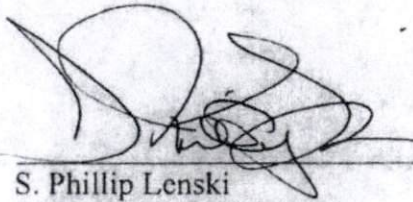
that prison officials have erroneously calculated his sentence, sentence-related credits, or custody status; and (2) when an inmate is disciplined and punishment is imposed in a major disciplinary hearing as a result of a serious rule violation. *See id.* at 369, 527 S.E.2d at 750.

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



**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

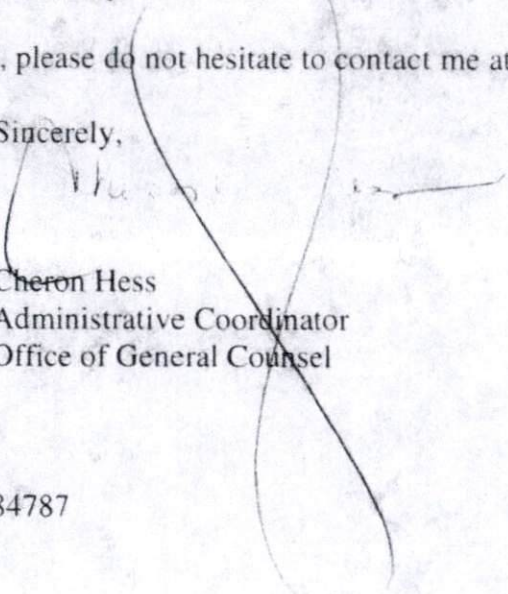
Reference: Inmate Abram Douglas Braveboy, #284787, vs. South Carolina Department of Corrections  
Docket No. 25-ALJ-04-0022-AP

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

5

**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,	)	<b>RESPONDENT'S MOTION TO</b>
	)	<b>DISMISS</b>
Respondent.	)	
<hr/>		

**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.<sup>1</sup> 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.<sup>2</sup> 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:

---

<sup>1</sup> A copy of the Step One Grievance is attached for the Court's and parties' convenience.

<sup>2</sup> 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

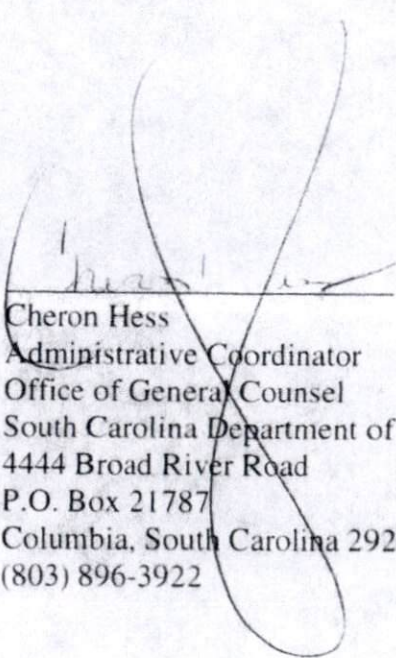
STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

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"

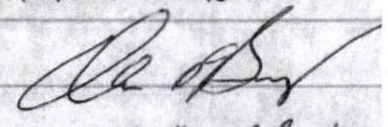
Matter Exigent, Extraordinary confirm AUTHORITY Appellant victim Plaintiff Abram D. Brandy  
 "Motion for Preliminary Injunction J.C. Civ. Rule 65/ Summary Judgment J.C. Civ. Rule 56 ALL Special Appeals  
 Rule 60, 63" Paramount Agency due to March 20, 2021 GENERAL COUNSEL Advis that Attorney  
 Chest Hill Administrative Coordinator OFFICIAL Inger-Jill Actual Attempt to Respond to the Noncontroversial  
 Appa MOTION for DEFENSE. In mockery against J.C. Civ. Rule 56(c) Action procedure in DEFAULT J.C. Civ.  
 NO FIRST HAND PERSONAL KNOWLEDGE, AFFIDAVIT even verified complaint. Article 153 J.C. Constitution 14th and  
 U.S. Constitution. Anderson v. Liberty Lobby 466 U.S. 205 (1984) 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 AFFIDAVIT is competent to testify to the m  
 stated therein. This Honorable Court, due to such attempt to BEGUIFE CONSENT 96-25-80 to NEARLY  
 Criminal J.C. Code 516-17-410 CONSPIRACY TO IMPERE 96-9-340, NEXUS 10/30/21 Anonymous GENERAL COUNSEL  
 J.C. Code 51-11-460. Awareness concealment Duration foreseeability to SUPPLEMENT Pecuniary DAMAGES to  
 GOOD CONFERENCE Lane in New York Life Insurance Company 56 Hun 4229 N.Y. St. Rep 4529 N.Y.S. 52  
 2/14/1890 J.C. Code 514-1-50 Common Law Proven ALL GENERAL COUNSEL OFFICE November 30, 2021, until  
 October 30, 2021, for AUTHORITY Supreme Clause Article II Sec (2) Congressional procedure 108th Congress 1001  
 Congressional Record 18 USC 3771. Article 1524 J.C. Constitution 516-3-1610 - 516-3-1640. (CUREA Criminal  
 victim Rights Act Adjusted procedure) SEE Ledgered Motion pg. 8 Rule 65/56 Affidavit 1 and 2 Proof. Due to  
 Absolute ACTUAL MALICE OBSTINATE GENERAL COUNSEL LEAST WASTON BREACH of DUTY DELIBERATE INDIFFERENCE  
 NEGLIGENCE J.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 J.C. Constitution  
 "ALL MEMBERS of the Bar WITH "to help me feel." PARALLELS CONSTITUTION

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

Through RECORD KNOWN REFERENCES CLEARANCE PELLUCID WITH CONFERENCE WITH WITNESS  
 WARDEN Staff in Entirety. GENERAL COUNSEL HAS NO Similar Genuine Issue of material fact Release  
 to Combat, COUNSEL WAS THE only lawful Legal RESULT FOR GENERAL COUNSEL BAR MEMBERS  
 Abram D. Brandy family; MENTAL, EMOTIONAL, PHYSICAL being MUST BE RESTORED TO TOTALITY

3/2/25  
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  
 can be reach once finalized (803)-351-8460

Mr. Dorothy Burgess Brandy

Will Born 28.5  
 Po Box 159  
 Contact J.C. 2412

Mr. Abram D. Brawley  
Waterloo Carr. Inth. Doin 2  
P.O. Box 189 A-5  
8200 Statefarm Rd.  
Rembert, S.C. 29128-0189



RECEIVED

SEP 22 2025

SC Court of Appeals

S.C. Court of Appeals  
Jenny ABBOTT KITCHING, CLERK  
P.O. Box 11629  
Columbia S.C. 29211