

IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

NOV 12 2025

SC Court of Appeals

CASE DOCKET NO. _____

APPEAL FROM THE SOUTH CAROLINA COURT OF APPEALS
REGARDING APPELLATE CASE NO. 2024-001229

APPEAL FROM RICHLAND COUNTY COURT OF COMMON PLEAS
POST CONVICTION RELIEF CASE NO. 2019-CP-400-2444

DEXTER L. MEYERS,

PETITIONER

Vs.

THE STATE OF SOUTH CAROLINA,

RESPONDENT

NOTICE OF SEEKING LEAVE TO APPEAL DUE TO FRAUD UPON THE
S.C. COURT OF APPEALS COURT, CONSPIRING UNDER COLOR OF
STATE LAW AND OBSTRUCTION OF JUSTICE TO PREVENT VOLUNTARY
DISMISSAL, WITHDRAWAL AND EQUITABLE TOLLING, CHALLENGING
THE S.C. COURT OF APPEAL JURISDICTION TO ISSUE ITS
RULING DUE TO VOLUNTARY DISMISSAL

TO: THE SOUTH CAROLINA SUPREME COURT ET. AL.,

THE S.C. COURT OF APPEALS ISSUED AN ORDER DENYING THE APPELLANT'S MOTION FOR REHEARING ON OCTOBER 31, 2025. THIS GIVES THE APPELLANT (10) DAYS FROM THE DATE OF THAT ORDER TO SEEK LEAVE TO APPEAL BEFORE THE SOUTH CAROLINA SUPREME COURT UNTIL NOVEMBER 10, 2025 MAKING THIS EFFORT TO SEEK TO APPEAL TIMELY BEING PLACED IN THE INSTITUTION MAILBOX ON NOVEMBER 6, 2025.

THE ISSUES ON APPEAL ARE AS FOLLOWS:

(1) DID THE APPELLANT HAVE A RIGHT TO WITHDRAW HIS APPEAL BEFORE THE S.C. COURT OF APPEALS MADE ITS RULING IN ACTS OF FRAUD UPON THE COURT, CONSPIRACY AND OBSTRUCTION OF JUSTICE?

(2) DO THE APPELLANT HAVE A CONSTITUTIONAL DUE PROCESS RIGHT TO ACT PRO SE WITHIN ANY CASE THAT INVOLVES HIM BEFORE ANY COURT?

(3) WAS THE S.C. COURT OF APPEALS DIVESTED OF JURISDICTION TO ISSUE ANY FINAL RULING IN THIS CASE DUE TO THE OBSTRUCTION OF VOLUNTARY DISMISSAL AND WITHDRAWAL BY ACTS OF FRAUD UPON THE COURT AND CONSPIRING UNDER COLOR OF STATE LAW?

INSOMUCH, THE COURT OF APPEALS CONSPIRING WITH THE S.C. ATTORNEY GENERAL'S OFFICE IN EGREGIOUS ACTS OF FRAUD UPON THE COURT, CONSPIRACY AND OBSTRUCTION OF JUSTICE HELD THE APPEAL SINCE 2024 WHEN THE APPEAL WAS FILED. THE APPELLANT LATER DISCOVERED BEFORE ANY RULING WAS MADE BY THE S.C. COURT OF APPEALS THAT DUE TO THE FRAUD UPON THE COURT OCCURRING BEFORE THE COURT OF COMMON PLEAS UNDER CASE 2019-CP-400-2444 AND THE DISCOVERY OF ISSUES REGARDING SUBJECT MATTER JURISDICTION. THE APPELLANT WAS ENTITLED TO FILE A SUCCESSIVE POST CONVICTION RELIEF ACTION UNDER THE INDEPENDENT ACTION RULE FOR FRAUD UPON THE COURT, WITHDRAW HIS APPEAL, TO ENSURE THAT THOSE SUBJECT MATTER JURISDICTION ISSUES ARE NOT UNINTENTIONALLY WAIVE AND OR FORFEITED WHICH PRODUCED THE ESTABLISHING OF CASE 2025-CP-400-7034 BEFORE THE RICHLAND COUNTY COURT OF COMMON PLEAS. IF THE COURT WOULD LOOK AT THE FILED APPLICATION UNDER

CASE 2025-CP-400-7034 ON PAGE (16) OF THE PCR APPLICATION. THE APPELLANT NOTIFIED THE S.C. ATTORNEY GENERAL'S OFFICE, THE 5TH. CIRCUIT SOLICITOR'S OFFICE, THE STATE APPOINTED ATTORNEY AND COURT OF THE APPEALS UNDER CASE 2024-001229 THAT THE APPELLANT'S INTENT WAS TO WITHDRAW THE APPEAL UNDER CASE 2024-001229 TO ALLOW THE SUBJECT MATTER JURISDICTION ISSUE TO BE HEARD AND ESTABLISH EQUITABLE TOLLING. SUBJECT MATTER JURISDICTION CAN BE RAISED AT ANY TIME, AT ANY STAGE, EVEN AFTER A FINAL ORDER WAS ISSUED UNDER CASE 2019-CP-400-2444, AND EVEN FOR THE FIRST TIME ON APPEAL UNDER CASE 2024-001229.

THE CONSPIRING S.C. COURT OF APPEALS, THE 5th. CIRCUIT SOLICITOR'S OFFICE AND S.C. ATTORNEY GENERAL'S INTENTION WAS TO PREVENT THE KNOWLEDGE OF THE JURISDICTIONAL ISSUES FROM BEING MADE A PART OF THE COURT RECORD UNDER CASE 2024-001229 AND TO PREVENT THE APPELLANT FROM ESTABLISHING RIGHTS OF WITHDRAWAL AND EQUITABLE TOLLING IN THEIR EFFORTS TO POTENTIALLY THWART THE SEEKING OF ANY SUBSEQUENT PETITION FOR HABEAS CORPUS THAT WAS TO BE FILED BEFORE THE U.S. DISTRICT COURT.

SO THE S.C. ATTORNEY GENERAL'S OFFICE GOT THE RICHLAND COUNTY CLERK TO HOLD THE FILING OF THE NEWLY FILED POST CONVICTION RELIEF APPLICATION THAT ARRIVED TO THEM BY CERTIFIED MAIL BEFORE THE S.C. COURT OF APPEALS RULED ON THE APPEAL, ARRIVING TO THE COMMON PLEAS COURT BY CERTIFIED MAIL NUMBER 7020 0640 0001 2733 9750 AFTER THE CASE SAT WITHIN THE S.C. COURT OF APPEALS AS LONG AS IT DID, WHICH IS WHY THE S.C. COURT OF APPEALS THEN RULED TO STOP THE VOLUNTARY DISMISSAL AND ESTABLISHING OF EQUITABLE TOLLING FROM BEING MADE A PART OF THE COURT RECORD UNDER CASE 2024-001229.

THE APPELLANT CAUGHT THE ATTEMPTS AT FRAUD UPON THE COURT, CONSPIRACY AND OBSTRUCTION OF JUSTICE AND IMMEDIATELY FILED MOTION TO RELIEVE COUNSEL AND FOR REHEARING SOLELY FOR THE PURPOSE OF SEEKING TO ESTABLISH THE FRAUD UPON THE COURT, CONSPIRACY, OBSTRUCTION OF JUSTICE AND VOLUNTARY WITHDRAWAL AS WELL AS HIS RIGHTS OF EQUITABLE TOLLING.

ONCE THE MOTION FOR REHEARING WAS FILED. THE APPELLANT

THEN FILED A DOCUMENT ENTITLED, "AFFIDAVIT OF FACTS GIVING JUDICIAL NOTICE; MOTION TO WITHDRAW THE APPEAL DUE TO FRAUD UPON THE COURT, CONSPIRACY, OBSTRUCTION OF JUSTICE AND TO ESTABLISH EQUITABLE TOLLING DUE TO SUCCESSIVE PCR UNDER INDEPENDENT ACTION RULE FOR FRAUD UPON THE COURT; MOTION TO RENEW THE MOTION TO CONTINUE TO ACT PRO SE", [5] PAGES DATED OCTOBER 29, 2015. ONCE THE COURT OF APPEALS SAW THE MOTION TO WITHDRAW THE APPEAL. THE COURT OF APPEALS THEN RULES ON THE MOTION FOR REHEARING WHEN THEY WERE DIVESTED OF JURISDICTION DUE TO THE VOLUNTARY WITHDRAWAL FOR WHICH THEY CONSPIRED UNDER COLOR OF STATE LAW TO PREVENT FROM BEING MADE A PART OF THE COURT RECORD BEFORE THE S.C. COURT OF APPEALS RULED. THIS NOTICE OF APPEAL NOW FOLLOWS.

THE S.C. COURT OF APPEALS STATED THAT THE ATTORNEY WAS REQUIRED TO FILE ANY MOTION? THE APPELLANT HAS A DUE PROCESS RIGHT TO MOTION TO RELIEVE COUNSEL AT ANY TIME AND GO ON THE RECORD AS TO WHY WHICH THE APPELLANT DID BY HIS PLEADING. THERE WAS NO TIME. THE APPELLANT SERVED THE ATTORNEY NOTICE OF HIS DESIRE TO WITHDRAW THE APPEAL BUT THE S.C. COURT OF APPEALS IN FRAUD RULED AND DENIED THE MOTION TO PREVENT THE APPELLANT'S VOLUNTARY DISMISSAL AND WITHDRAWAL FROM BEING MADE A PART OF THE COURT RECORD BEFORE ANY STATE APPOINTED ATTORNEY COULD ACT. THE APPELLANT KNEW OF THIS WOULD OCCUR DUE TO HIS ARGUING AGAINST THE PRECEDENT ESTABLISHED BY THE STATE v. GENTRY CASE IN 2005. THE UNITED STATES SUPREME COURT SPOKE IN NO UNCERTAIN TERMS. WITH INDIVIDUAL LIBERTY AT STAKE, IT IS THE DEFENDANT'S PREROGATIVE, NOT COUNSEL'S, TO DECIDE ON THE OBJECTIVES OF HIS DEFENSE AND A DEFENDANT MAY INSIST UPON REPRESENTING HIMSELF NO MATTER HOW COUNTERPRODUCTIVE THAT COURSE MAY BE. THE RIGHT TO DEFEND IS PERSONAL, AND A DEFENDANT'S CHOICE IN EXERCISING THAT RIGHT MUST BE HONORED OUT OF THAT RESPECT FOR THE INDIVIDUAL WHICH IS THE LIFEBLOOD OF THE LAW AS IT RELATED TO HIS DESIRE TO VOLUNTARILY DIMISS AND WITHDRAW HIS APPEAL, JONES v. STATE, 2024 WL 2787273 (Tex.2024); McCOY v. LOUISIANA, 584 U.S. 414, 138 S.Ct. 1500, 200 L.Ed.2d. 821(U.S.2018); UNITED STATES v. DiMARTINO, 949 F.3d. 67 (2nd.Cir.2020); MAZE v. OLIVER, Fed. Supp., 2024 WL 2848308(3rd.Cir.2024); WEAVER v. MASSACHUSETTS, 582 U.S. 286, 137 S.Ct. 1899, 198 L.Ed.2d. 420(U.S.2017)(THE RIGHT OF A DEFENDANT

TO CONDUCT HIS OWN DEFENSE IS BASED ON THE FUNDAMENTAL LEGAL PRINCIPLE THAT A DEFENDANT MUST BE ALLOWED TO MAKE HIS OWN CHOICES ABOUT THE PROPER WAY TO PROTECT HIS OWN LIBERTY WHICH ESTABLISHES CONSTITUTIONAL STRUCTURAL ERROR). THE STATE APPOINTED COUNSEL, AS FAR AS THE APPELLANT IS CONCERNED, IS COMPROMISED AND PART OF THE CONSPIRACY WHERE HE WAS CLEARLY SERVED NOTICE OF THE APPELLANT'S DESIRE TO WITHDRAW THE APPEAL BUT FAILED TO IMMEDIATELY ACT TO PRESERVE THIS RIGHT.

THE DISCONTINUANCE OF AN APPEAL IS USUALLY GRANTED, WHICH IS WHY THE S.C. COURT OF APPEALS CONSPIRING UNDER COLOR OF STATE LAW WITH THE S.C. ATTORNEY GENERAL'S OFFICE IN FRAUD UPON THE COURT BLOCKED THE FILING AND CIRCUMVENTED THE RULING ON THE MOTION TO DENY THE APPELLANT THE RIGHT TO WITHDRAW THE APPEAL AND ESTABLISH EQUITABLE TOLLING DUE TO SUBJECT MATTER JURISDICTION ISSUES THAT CANNOT BE WAIVED AND OR FORFEITED AND COULD BE RAISED AT ANY TIME, EVEN AFTER A FINAL ORDER WAS ISSUED IN CASE 2019-CP-400-2444, EVEN FOR THE FIRST TIME ON APPEAL, DADA v. MUKASSEY, 128 S.Ct. 2307(U.S.2008); APPEAL OF LATHAM, 76 U.S. 145 (U.S.1869); U.S. v. MINNESOTA & N.W.R. CO., 59 U.S. 241 (U.S.1855); S.C. RULES OF APPELLATE PROCEDURE, RULE 260(b); KNIGHT v. WAGGONER, 359 S.C. 492, 597 S.E.2d. 894(S.C.App.2004)(ORDINRILLY AN APPELLANT IS ENTITLED TO A VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS A MATTER OF RIGHT, UNLESS THERE IS A SHOWING OF PREJUDICE, WHICH NO SHOWING OF PREJUDICE WAS MADE IN FRAUD AND OBSTRUCTION, TO THE RESPONDENT; IF NO LEGAL PREJUDICE IS SHOWN DUE TO THE JURISDICTIONAL ISSUES PRESENTED WHICH CANNOT BE WAIVED OR FORFEITED, THE JUDGE HAS NO DISCRETION WITH RESPECT TO GRANTING A DISMISSAL WITHOUT PREJUDICE, BUT IF THE PREJUDICE TO THE OTHER PARTY IS SHOWN, WHICH IN FRAUD UPON THE COURT THERE WAS NO SHOWING OF PREJUDICE, THE MATTER BECOMES ONE OF DISCRETION FOR THE JUDGE(S)); KNOFF v. KNOFF, 247 S.C. 378, 147 S.E.2d. 638 (S.C.App.1968). IF THE DISCONTINUANCE OR VOLUNTARY DISMISSAL WILL NOT RESULT IN LEGAL PREJUDICE TO THE RESPONDENT, WHICH IT WILL NOT BECAUSE SUBJECT MATTER JURISDICTION CANNOT BE WAIVED OR FORFEITED AND CAN BE RAISED AT ANY TIME, THE APPELLANT HAD A RIGHT TO DISCONTINUE ANY ACTION COMMENCED BY HIM WHICH PREVENTED THE S.C. COURT OF APPEALS

FROM RULING ON THE MERITS AND REHEARING, WALKER v. JONES, 269 S.C. 19, 235 S.E.2d. 810(S.C.App.1977). PARTY OPPOSING MOTION FOR VOLUNTARY WITHDRAWAL WITHOUT PREJUDICE, MUST BE MORE THAN THE POSSIBILITY OF DEFENDING ANOTHER SUIT.

INASMUCH, THE S.C. COURT OF APPEALS ONLY HAD JURISDICTION TO DETERMINE THE FINAL DISPOSITION OF THE MOTION TO WITHDRAW THE APPEAL, NOT ON THE MERITS FOR WHICH THAT COURT CONSPIRED WITH THE S.C. ATTORNEY GENERAL'S OFFICE IN EGREGIOUS ACTS OF FRAUD UPON THE COURT BLOCKED TO PREVENT THE MOTION TO WITHDRAW THE APPEAL AND SEEKING TO ESTABLISH EQUITABLE TOLLING FROM ENTERING INTO THE COURT RECORD BY WHAT IS PREVIOUSLY ARGUED, IN RE: MATTHEWS, 395 F.3d. 477 (4th.Cir.2005). AFTER THE APPEAL WAS SOUGHT VOLUNTARY WITHDRAWAL AND THE S.C. COURT OF APPEALS WORKING WITH THE STATE IN FRAUD UPON THE COURT PREVENTED FROM BEING MADE A PART OF THE COURT RECORD. THE S.C. COURT OF APPEALS WAS WITHOUT CONSTITUTIONAL AUTHORITY TO CONDUCT FURTHER PROCEEDINGS AND ADDRESS THE MERITS WHICH INCLUDED THE MOTION FOR REHEARING, LYCURGAN INC. v. JONES, 2014 WL 12693225 (S.D.Cali.2014); SATTERFIELD v. VAUGH, 2024 WL 3633581, * 1+ (4th.Cir.2014)(THE S.C. COURT OF APPEALS WAS DIVESTED OF JURISDICTION AND HAD NO AUTHORITY TO ISSUE ITS RULING WHICH IS COMPOUNDED BY THE FRAUD UPON THE COURT, AND THE DETERMINATION IS VOID); PARNELL v. POWELL, 191 S.C. 159, 3 S.E.2d. 801 (S.C.App.1939).

FRAUD VITIATES EVERYTHING THAT IT ENTERS. A JUDGMENT PROCURED BY FRAUD MAY BE COLLATERALLY ATTACKED. THIS APPLIES TO ALL JUDGMENTS, ACTS, ORDERS OR DECREES BY ALL COURTS ON RECORD, INCLUDING THE S.C. COURT OF APPEALS. SUPPRESSION OF TRUTH, LIKE THE S.C. COURT OF APPEALS AND 5TH. CIRCUIT SOLICITOR'S OFFICE COMPROMISING APPELLANT COUNSEL CONSPIRED TO SUPPRESS THE TRUTH OF THE VOLUNTARY WITHDRAWAL WITH THE INTENT TO DECEIVE IS FRAUD. FRAUDULENT CONCEALMENT (PREVENTING THE MOTION FOR VOLUNTARY WITHDRAWAL TO BE RULED ON BEFORE THE S.C. COURT OF APPEALS ISSUED A FINAL RULING ON THE MERITS) WITHOUT ANY MISREPRESENTATION OR DUTY TO DISCLOSE WOULD CONSTITUTE FRAUD, EVEN IN ABSENCE OF FIDUCIARY DUTY, WHICH THE COURT OF APPEALS HAD, STATUTORY OR

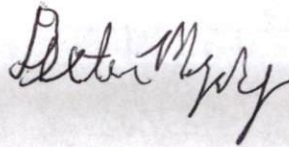
OTHERWISE INDEPENDENT LEGAL DUTY TO DISCLOSE MATERIAL INFORMATION, (LIKE THE VOLUNTARY WITHDRAWAL UNDER RULE 260(b) THAT THEY PREVENTED FROM BEING ENTERED INTO THE COURT RECORD), MISLEAD OR OTHERWISE DECEIVE TO PREVENT THE APPELLANT FROM ACQUIRING MATERIAL INFORMATION, LIKE THE RULING ON THE MOTION TO WITHDRAW THE APPEAL BEFORE THE S.C. COURT OF APPEALS RULED, IS FRAUD UPON THE COURT BY OFFICERS OF THE COURT AIMED AT THE MACHINERY OF THE COURT THAT PREVENTS THE COURT FROM PERFORMING ITS NORMAL FUNCTION OF ADJUDICATION CASES IN ACCORDANCE TO CONSTITUTIONAL DUE PROCESS LAW WHICH VOIDS THE JUDGMENT, IN RE: DURAMAX DIESEL LITIGATION,--F.R.D.--, 2018 WL 949856 (E.D.Mich.2018); UNITED STATES v. PALIN, 874 F.3d. 418 (4th.Cir.2017); UNITED STATES v. LUSK, 2017 WL 508589 (S.D.Va.2017); UNITED STATES v. CALLOWAY, F.Supp.3d., 2016 WL 4269961(N.D.Cali.2016); MDL INNOVATIONS, LLC. v. NORTHERN,--Fed. Appx'--, 2018 WL 1129607 (4th.Cir.2018); HAMER v. NEIGHBORHOOD HOUSING SERVICES OF CHICAGO, 138 S.Ct. 13, 199 L.Ed.2d. 249(U.S.2017); UNITED STATES v. CONRAD, 675 Fed. Appx' 263 (4th.Cir.2017); IN RE: GENESYS DATA TECHNOLOGIES, INC., 204 F.3d. 124 (4th.Cir.2000); MYLES v. DOMINO'S PIZZA, LLC., 2017 WL 238436(D.C.Miss.2017); FIRST TECHNOLOGY CAPITAL, INC. v. BANCTEC, INC., 2016 WL 7444943(D.C.Ky.2016); McCLAIN v. 1st. SECURITY BANK OF WASHINGTON, 2016 WL 8504775(W.D.Wash.2016).

SUBJECT MATTER JURISDICTION IS THE POWER TO DECLARE LAW, WHETHER IT BE UNDER THE CONSTITUTIONAL ELEMENT TO SUBJECT MATTER JURISDICTION OR THE STATUTORY ELEMENT TO SUBJECT MATTER JURISDICTION. THEREFORE, IT CANNOT BE WAIVED AND OR FORFEITED, CAN BE RAISED AT ANY TIME, AT ANY STAGE, EVEN AFTER A FINAL ORDER WAS ISSUED IN THE CASES, EVEN FOR THE FIRST TIME ON APPEAL TO PREVENT THIS UNCONSTITUTIONAL ACTION OF THE S.C. COURT OF APPEALS AND STATE ACTORS BLOCKING THE FILING AND RULING ON THE APPELLANT'S MOTION TO VOLUNTARILY DISMISS THE APPEAL UNDER CASE 2024-001229 WHICH PREVENTS A FINAL RULING ON THE MERITS, PAVONNE v. AMERICAN CONTRACT SYSTEMS, INC., 2025 WL 2977640(M.D.Fla.2025); HUNTSVILLE SENIOR SERVICES v. ALABAMA

DEPARTMENT OF PUBLIC HEALTH, 645 F.Supp.3d. 1254(N.D.Ala.2022); HENSELEY v. CITY OF CHARLOTTE, 2023 WL 2533083 (W.D.N.C.2023); B.R. v. F.C.S.B., 17 F.4TH. 485(4th.Cir.2021); STEEL CO. v. CITIZENS FIR A BETTER ENVIRONMENT, 523 U.S. 83, 118 S.Ct. 1003(U.S.1998); al-SUYID v. HIFTER, 139 F.4TH. 368 (4th.Cir.2025). THE MERE CLAIM THAT RIGHTS EXISTED UNDER THE CONSTITUTIONAL ELEMENT TO SUBJECT MATTER JURISDICTION PURSUANT TO THE APPELLANT'S RIGHT TO WITHDRAW HIS APPEAL WHICH WAS UNCONSTITUTIONALLY IN ACTS OF FRAUD UPON THE COURT BLOCKED FROM BEING GIVEN JUDICIAL REVIEW TO ESTABLISH RIGHTS OF EQUITABLE TOLLING TO ADDRESS JURISDICTIONAL ISSUES WAS MORE THAN SUFFICIENT TO PREVENT THE S.C. COURT OF APPEALS FROM MAKING ANY FINAL RULING IN THIS CASE DUE TO VOLUNTARY DISMISSAL AND WITHDRAWAL REQUIRING THE ACTION TO BE DEEMED UNCONSTITUTIONAL AND VOID, STOP RECKLESS ECONOMIC INSTABILITY BY DEMOCRATS v. FEDERAL ELECTION COMM'S, 814 F.3d. 221 (4th.Cir.2016); WESTMINSTER NURSING CENTER v. COHEN, 2017 WL 5632661 (E.D.N.C.2017); FIRST PROTECTION INSURANCE COMPANY v. LEWIS EDWARD O'LEARY, 2025 WL 1936566 (4th.Cir.2025)(THE U.S. SUPREME COURT HAS STATED IN NO UNCERTAIN TERMS THAT THE COURTS ARE NOT FREE TO SIMPLY ASSUME THAT THEY POSSESS SUBJECT MATTER JURISDICTION AND THEN TO PROCEED TO DECIDE THE MERITS OF THE ISSUES BEFORE THEM WHEN IN THIS CASE THERE WAS A MOTION TO WITHDRAW THE APPEAL WHICH THE COURT CONSPIRING WITH THE S.C. ATTORNEY GENERAL BLOCKED FROM BEING ADJUDICATED)[THIS MANIFEST INJUSTICE PLACE THE CASE BEYOND THE S.C. COURT OF APPEALS JURISDICTION TO ADDRESS ANY MERITS OR THE MOTION FOR REHEARING]; JEFFERIES v. PRINCE GEORGE'S COUNTY, 2025 WL 590433 (D.Md.2025); KOKKONEN v. GUARDIAN LIFE INS. CO. OF AMERICA, 144 S.Ct. 1673(U.S.1994)(COURTS, ALL COURTS, STATE AND FEDERAL, ONLY POSSESS POWER BY **"CONSTITUTION"** (EMPHASIS ADDED) AND STATUTE WHICH IS NOT TO BE EXPANDED BY JUDICIAL DECREE. IT IS PRESUMED THAT THE CAUSE LIES OUTSIDE, BEYOND, THE COURT'S **"CONSTITUTIONAL"** JURISDICTION, AND THE BURDEN OF ESTABLISHING THE CONTRARY WAS ON THE RESPONDENT, NOT THE S.C. COURT OF APPEALS WHERE THEY CONSPIRED IN EGREGIOUS ACTS OF FRAUD UPON THE COURT TO BLOCK THE MOTION TO WITHDRAW AND RULE ON THE MERITS WHEN THE COURT DID NOT HAVE CONSTITUTIONAL JURISDICTION, COPER BRIGHT ENTERPRISES v.

RAIMONDO, 603 U.S. 369, 144 S.Ct. 2244(U.S.2024); LOZMAN v. CITY OF RIVERA BEACH, FLA., 133 S.Ct. 735(U.S.2013); CROSS-SOUND FERRY SERV., INC. v. I.C.C., 834 F.3d. 327, 339 (C.A.D.C.1991); THE CITY OF OCALA, FLORIDA v. ROJAS, 598--U.S.--, 2023 WL 2357328 (U.S.2023)(HIGHLIGHTNG BOTH ELEMENTS OF SUBJECT MATTER JURISDICTION AND THE VOIDING OF JURISDICTION); WILKINS v. UNITED STATES,--S.Ct.--, 2023 WL 2655449 (U.S.2023)(REGARDING CLAIM PROCESSING RULES AND THE VOIDING OF JURISDICTION); UNITED STATES v. BROWN,--F.4TH.--, 2023 WL 3214545 (4th.Cir.2023)(REGARDING THE REQUIREMENT TO PLACE PROPER ELEMENTS WITHIN AN INDICTMENT AND THE VOIDING OF JURISDICTION); MONTGOMERY v. LOUISIANA, 136 S.Ct. 718, 193 L.Ed.2d. 599(U.S.2016)(UNCONSTITUTIONAL ACTION WITHIN CRIMINAL CASES WHICH INCLUDE THE S.C. COURT OF APPEALS VOIDS JURISDICTION TO ADDRESS THE MERITS DUE TO THE FRAUD BLOCKING THE MOTION TO VOLUNTARILY WITHDRAW THE APPEAL); STEEL CO. v. CITIZENS FOR A BETTER ENVIRONMENT, 523 U.S. 83, 118 S.Ct. 1003 (UNCONSTITUTIONAL ACTION UNDER BOTH THE STATUTORY AND CONSTITUTIONAL ELEMENTS TO SUBJECT MATTER JURISDICTION VOIDS JURISDICTION).

RESPECTFULLY,
DEXTER L. MEYERS



NOVEMBER 5, 2025

IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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SC Court of Appeals

CASE DOCKET NO. _____

APPEAL FROM THE SOUTH CAROLINA COURT OF APPEALS
REGARDING APPELLATE CASE NO. 2024-001229

APPEAL FROM RICHLAND COUNTY COURT OF COMMON PLEAS
POST CONVICTION RELIEF CASE NO. 2019-CP-400-2444

DEXTER L. MEYERS,

PETITIONER

Vs.

THE STATE OF SOUTH CAROLINA,

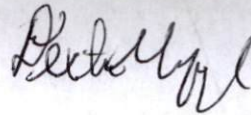
RESPONDENT

AFFIDAVIT OF SERVICE

I, DEXTER L. MEYERS, DO HEREBY CERTIFY, THAT I HAVE MAILED AND OR SERVED A COPY OF A NOTICE OF SEEKING LEAVE TO APPEAL DUE TO FRAUD UPON THE S.C. COURT OF APPEALS COURT, CONSPIRING UNDER COLOR OF STATE LAW AND OBSTRUCTION OF JUSTICE TO PREVENT VOLUNTARY DISMISSAL, WITHDRAWAL AND EQUITABLE TOLLING,

CHALLENGING THE S.C. COURT OF APPEALS JURISDICTION TO ISSUE ITS RULING DUE TO VOLUNTARY DISMISSAL, ON THE S.C. SUPREME COURT P.O. BOX 11330 COLUMBIA, S.C. 29221, THE S.C. COURT OF APPEALS P.O. BOX 11629 COLUMBIA, S.C. 29221 AND ALL OTHER PARTIES, BY U.S. MAIL POSTAGE PREPAID, BY DEPOSITING IT IN THE INSTITUTION MAILBOX ON NOVEMBER 6, 2025.

RESPECTFULLY,
DEXTER L. MEYERS

A handwritten signature in cursive script, appearing to read "Dexter L. Meyers", written in dark ink.

NOVEMBER 6, 2025

DEXTER L. MEYERS
#365377 RHU RM. 204
EVANS C.I. 610 HWY. 9 WEST
BENNETTSVILLE, S.C. 29512

IN RE: CASE 2024-001229 SEEKING TO APPEAL THE FINAL ORDER IN THE
S.C. SUPREME COURT.

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NOV 12 2025

SC Court of Appeals

TO: THE S.C. SUPREME COURT,
THE S.C. COURT OF APPEALS ET. AL.,

THE I ASKED AN INMATE TO ASSIST ME IN GETTING THIS
PLEADING SENT TO YOU DUE TO STATE INTERFERENCE ON THE PART OF THE
INSTITUTION IN WHICH I AM CURRENTLY HOUSED. ATTACHED (11) PAGE
DOCUMENT IS MY NOTICE SEEKING LEAVE TO APPEAL THE FINAL ORDER
ISSUED UNDER CASE 2024-001229 ON OCTOBER 31, 2025 BEFORE THE S.C.
SUPREME COURT. I ASK THAT THE S.C. SUPREME COURT PLEASE FILE THE
PLEADING AND ASSIGN IT A CASE NUMBER TO ALLOW ME TO CONTINUE TO
PERFECT THE APPEAL BEFORE THE S.C. SUPREME COURT. SERVICE IS DONE
ON THE S.C. COURT OF APPEALS AND PARTIES. I THANK YOU IN ADVANCE.

RESPECTFULLY,
DEXTER L. MEYERS

NOVEMBER 6, 2025

CC: THE S.C. COURT OF APPEALS
THE S.C. ATTORNEY GENERAL

(4) Date of result (if you know): _____

(5) Citation to the case (if you know): _____

(6) Grounds raised: _____

(h) Did you file a petition for certiorari in the United States Supreme Court? Yes No

If yes, answer the following:

(1) Docket or case number (if you know): _____

(2) Result: _____

(3) Date of result (if you know): _____

(4) Citation to the case (if you know): _____

10. Other than the direct appeals listed above, have you previously filed any other petitions, applications, or motions concerning this judgment of conviction in any state court? Yes No

11. If your answer to Question 10 was "Yes," give the following information:

(a) (1) Name of court: _____

(2) Docket or case number (if you know): _____

(3) Date of filing (if you know): _____

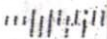
(4) Nature of the proceeding: _____

(5) Grounds raised: _____

(6) Did you receive a hearing where evidence was given on your petition, application, or motion?

Yes No

(7) Result: _____



EVANS C.I. 610 HWY. 9 WEST
 BENNETTSVILLE, S.C. 29512



MAY 30 2025
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SC Court of Appeals

THE S.C. COURT OF APPEALS
 P.O. BOX 11629
 COLUMBIA, S.C. 29211