

**FORM 13,  
APPELLANT'S RESPONSE TO INITIAL BRIEF OF  
RESPONDENTS**

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SC Court of Appeals

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

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JAN 16 2026

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Case No. 2024-CP-000925

Richard Smith,

Appellant.

V

P. Christopher Smith, Jr.  
Esquire, James P. Walsh, Esquire  
Legal Representative of Srikanth Pilla,  
Clemson University International Center Automotive Research (CUICAR),  
Respondent,

**APPELLANT'S RESPONSE TO INITIAL BRIEF OF  
RESPONDENTS**

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# **1. Introduction and Purpose**

## **1.1 Purpose of this Document**

The appellant submits this Response to the Initial Brief of Respondents to address issues relevant to the Court of Appeal, specifically focusing on:

- Conflict of interest of the lower court
- Procedural irregularities and misrepresentation of evidence
- Evidence of the appellant's leadership and founding role of the Composite Center
- Broader public-interest, diversity, and discrimination context
- Compliance with statute of limitations under discovery, contract, and fraud claims

This document is not intended to respond to every minor or misleading claim in the Respondents' 23-page brief, but it addresses all material contentions and key arguments necessary for the Court of Appeal's review.

## **1.2 Precedent and Public-Private Partnerships**

The appellant is aware of no prior case in South Carolina history involving a private person versus a public institution within a public-private partnership context. This appeal is thus positioned to set new legal standards for public-private collaborations, protecting the rights of individuals contributing intellectual property and expertise to public institutions.

## **1.3 Pro Se Procedural Limitations**

- A. The appellant faced conflicts of interest combined with the monopolistic position of a public institution, which materially impaired his ability to obtain fair legal representation.
- Approximately 90% of law firms contacted refused representation, citing conflicts of interest due to the University's pervasive influence.
  - Under Hawk Law, the appellant could retain out-of-state counsel only if paired with a certified South Carolina lawyer, which reintroduced structural barriers and procedural disadvantage.
  - These combined factors—institutional dominance, conflicts of interest, and limited access to counsel—further restricted the appellant's ability to develop evidence, present arguments, and fully participate in the lower court proceedings, particularly in a Pro Se capacity.
- B. The appellant proceeded Pro Se in the lower court but is not permitted to file documents online, unlike represented parties.
- As a result, all filings had to be physically submitted, subject to strict mailing and timing rules.

- Practical disadvantage:
  - Pro Se status imposed a time and access burden that could have been avoided with online filing privileges. For example, our local post office is open only 4 hours per day, 1 hour Saturdays, and closed at Sundays, further restricting timely filing, while law firm can file 24/7.
  - Higher court filing advantage: At the appellate level, the appellant was permitted to submit documents digitally, demonstrating that the lower court restrictions were a unique procedural burden.
  - However, this regulation does not replace the responsibility of the applicant to send hard copies to all parties involved, meaning Pro Se litigants still face physical filing obligations.

#### 1.4 Conflict of Interest in Key Positions

- **Judge Fant III:** presided over the lower court proceedings despite personal connections: he is a family member of a close friend, a Clemson Tiger teammate, and former roommate of the appellant. Prior interactions included a single referral phone call, creating potential bias.
- **Judge Morgan:** strikes down the motion of dismissal and granted the statute of discovery is valid.
- **Nikki Haley:** former Governor of South Carolina, former U.S. Presidential candidate, and lifetime board member of Clemson University since 2019. Evidence demonstrates her personal interest in expanding Roding Technology to her hometown, creating a potential conflict in oversight and decision-making affecting the appellant's contributions.

These conflicts of interest, combined with procedural irregularities, require careful appellate review to ensure fairness and impartiality.

## 2. Intellectual Property, Ownership, and Damages

### 2.1 Origin of the Composite Center Idea

- A. The Composite Center was conceived and developed by Mr. Richard Smith prior to any involvement by CUICAR or Dr. Pilla.
- B. The original concept was pitched on November 10, 2013, providing a framework for industrial-scale automotive composites research and applications.
- C. Mr. Smith provided feasibility studies, technical guidance, and industry connections, enabling execution under CUICAR oversight while retaining ownership of pre-existing know-how and inventions (Supporting evidence: Exhibit 4, Exhibit 5, Exhibit 7, Exhibit 9).

## 2.2 Composite Center as Appellant's Intellectual Property

- Substantial evidence demonstrates the Composite Center is Mr. Smith's intellectual property.
- The appellant never requested naming rights for the Center or any portion of grant funding awarded to Clemson/CUICAR.
- The deletion of Mr. Smith's involvement materially affects past earnings, including endorsements, credits, awards, titles, sponsorships, grants, donations, revenue, promotions, offers, and marketing opportunities, which were claimed by Dr. Pilla.
- The appellant claims that the \$150 million in damages asserted in the lawsuit should be considered in the context of the over \$1 billion in cumulative past revenue generated by the university, both through the Composite Center in association with the industry partners the appellant brought to the campus, measured up to the present day.
- The appellant also highlights the magnitude of future earning potential, emphasizing the commercial and reputational value of the Center as a high-value innovation hub.

## 2.3 Appellant's Access, Insurance, and Legal Wrongdoing by Respondents

- A. Mr. Smith was never lawfully removed from the campus. Despite Respondent Fred Cartwright implying that the appellant maintained improper or inadequate insurance coverage, the facts show otherwise.
- B. **Insurance Coverage:** The appellant maintained appropriate insurance (Exhibit 21). Under South Carolina law, insurance is not required for businesses with fewer than 5–10 employees. Furthermore, CUICAR, as a public institution, provided liability coverage for its operations.
- C. **Conflict of Advice / Intentional Fraud:** Fred Cartwright personally recommended the insurance company to the appellant. This advice, combined with subsequent accusations of inadequate coverage, constitutes either a conflict of advice or intentional misrepresentation, potentially rising to fraud under South Carolina law.
- D. The respondent's assertion that the appellant was "evicted from campus" is false. Under South Carolina law, eviction requires a judicial proceeding and law enforcement execution. No 90 days past due, court order, notice, or police action occurred. The respondent's use of the term is legally incorrect, deliberately misleading and deformation of character.
- E. **Illegal or Improper Removal:** The rental cancelation of Cartwright attempt occurred after the expiration of the NDA between CUICAR and Roding, which unjustly restricted the appellant's access to industry partners he introduced. This action constitutes misappropriation of intellectual property, interference with contractual and business relations, and fraudulent misrepresentation.
- F. **Impact on Earnings:** The appellant claims that the \$150 million in damages asserted in the lawsuit should be considered in the context of the over \$1 billion in cumulative past revenue generated by

the university, both through the Composite Center and in association with the industry partners he brought to the campus, measured up to today. This underscores the commercial and reputational value of the Center as a high-value innovation hub.

These facts illustrate a conflict of advice and/or intentional fraud. Under South Carolina law, intentional fraud requires proof that a false representation was made knowingly or with reckless disregard for the truth, with the intent to induce reliance, which caused proximate injury to the plaintiff. The eviction, removal of campus access, and interference with the appellant's industry partnerships satisfy these criteria, as the misrepresentations and actions were designed to mislead and disadvantage the appellant, causing direct economic and reputational harm.

- This action effectively restricted the appellant's access to industry partners he had introduced, including direct connections he developed as part of his contributions to the Composite Center.
- South Carolina law does not require this type of insurance for businesses with fewer than 5–10 employees.
- CUICAR, as a public institution, covered liability, making additional insurance unnecessary.
- This action effectively restricted the appellant's access to industry partners he had introduced, including direct connections he developed as part of his contributions to the Composite Center.

### **3. Rule 56, Procedural Context, and Pro Se Limitations**

#### **3.1 Rule 56 Context**

- Summary judgment under Rule 56(c), SCRPC requires genuine disputes of material fact to be resolved by a fact-finder.
- The lower court improperly relied on Exhibit 1, filed less than 72 hours before the hearing, without providing the appellant notice.
- This resulted in the appellant being effectively “blind” to critical evidence, preventing fair response.

#### **3.2 Pro Se Limitations**

- A. The appellant is self-represented (Pro Se), with limited prior court experience. South Carolina law recognizes that Pro Se litigants are held to the same procedural rules as attorneys but may receive limited leniency to ensure fairness. (See: Price v. Price, 363 S.C. 451, 611 S.E.2d 351 (2005)) Practical challenges for the appellant included:
- Filing deadlines and compliance with procedural rules
  - Evidence submission after depositions
  - Navigating complex procedural rules without formal legal training

- B. By law, Pro Se litigants must comply with filing deadlines, but access to electronic filing systems is not automatically granted. In this case, the appellant was restricted to in-person or postal filings during post office hours only, while law firms had electronic filing access with extended hours, system notifications, and other procedural advantages.
- C. This procedural disparity created a material disadvantage, limiting the appellant's ability to timely submit evidence, respond to filings, and fully exercise procedural rights.
- D. Additional challenges:
- Denial of adoption of online filing by law (law firm vs. Pro Se)
  - Minimum 8-hour advantage for attorneys on same-day filing deadlines
  - Discrimination against Pro Se litigants in practical access to court processes
- E. Despite these limitations, the appellant maintained diligent records and compliance with legal timelines, ensuring that all submissions were made in good faith and in accordance with court rules.

### **3.3 Personal and Health Challenges**

Over the past nine years, the appellant experienced:

- Moving apartments, relocating, and living under unstable condition and life-threatening health issues affecting daily organization and ability to access old work documents;
- Loss of family members: sister, mother, and stepmother
- Miscarriage (2015) and becoming a father (2016), Mental and physical burnout; Health issues limiting income, which in turn produced further health complications;
- Recovery after a world-changing pandemic, which altered the culture of work and required seeking new professional opportunities;
- Shifting family responsibilities and priorities due to care of a minor child.

These personal challenges impacted timely evidence access and procedural filings, which the Court should consider in assessing the lower court's handling of this case.

## **4. Legal Foundation and Statutes**

### **4.1 Statute of Discovery and Limitations**

Discovery of Respondent's misrepresentations occurred in July 2020, triggering the statute of limitations under South Carolina law:

- S.C. Code § 15-3-520 – limitations for actions involving contracts

- S.C. Code § 15-3-530(1) & (7) – discovery rule and accrual of cause of action
- S.C. Code § 36-2-725 – obligations under contracts and corporate authority

The statute of discovery was granted by Judge Morgan by stroke down the motion of dismissal of defendant team, establishing the correctness of the filing period. Filing was timely.

#### **4.2 Fraud and Contract Claims**

Respondent’s deletion of Mr. Smith’s involvement constitutes misappropriation, plagiarism, and fraud, legally supporting claims for:

- Breach of contract
- Fraudulent misrepresentation
- Injunctive relief to protect intellectual property

#### **4.3 Background Rights / Intellectual Property Protection**

- Contract Clause 5.1 at Research Subcontract, including Research Subcontract No. 1727-245-2010096 Attachment 1, protects pre-existing know-how and inventions of the contractor of (exhibit 4)
- All emails and documents were marked “Vertraulich” or “Confidential”, establishing explicit contractual and ethical confidentiality obligations on recipients, including CUICAR, Dr. Pilla, and industry partners.
- These provisions legally safeguard Mr. Smith’s leadership, ideas, and contributions, independent of the university.

### **5. Broader Implications and Precedent**

#### **5.1 Public-Private Partnership Importance**

- A. This case arises from a public-private partnership in which a private individual contributed proprietary intellectual property, industry know-how, and commercial relationships to a public institution, CUICAR/Clemson University.
- B. The appellant’s contributions were foundational to the creation, credibility, and industrial relevance of the Composite Center. This legal gap permits public institutions to appropriate intellectual property, leadership credit, and commercial benefit without meaningful accountability.
- C. South Carolina law currently lacks customized protection for industry partners in public R&D

projects, effectively allowing appropriation of intellectual property by public institutions.

- D. The appellant aims to set legal precedent protecting individuals contributing to public-private partnerships.
- E. Additional evidence obtained by the appellant in 2025 shows that Clemson University's Division of Research implemented a Financial Conflict of Interest Related to Research Policy on June 13, 2019 (Exhibit 101). This policy post-dates the appellant's contributions and reflects institutional acknowledgment that conflicts of interest in research relationships require formal regulation—regulation that did not exist during the relevant period of this case.

The record further establishes that:

- All CUICAR invoicing was processed through the procurement office of Clemson's main campus;
- The Clemson University Research Foundation, under the leadership of Casey Porto, was present at key meetings involving of the appellant; The Foundation interfered with the Mutual NDA on multiple occasions; and The Foundation is claiming credit for a €357 million Siemens software grant as its own, as confirmed in deposition testimony.

These facts demonstrate institutional overreach into private intellectual contributions and reinforce the need for appellate guidance and legal action.

The appellant respectfully submits that this case presents an appropriate opportunity for the Court to clarify the legal rights of private contributors in public-private partnerships and to prevent future misappropriation of innovation, credit, and economic value.

## **5.2 Conflict of Interest**

- See Section 1.4: Judge Fant III and Nikki Haley.
- Evidence shows personal interests potentially affecting impartiality and decision-making.

## **5.3 Rule 56 Misapplication**

- Respondent misuses Rule 56 by submitting an affidavit less than 72 hours before the hearing.
- The appellant's evidence and leadership role predate the architectural documents submitted by Respondent, highlighting procedural improprieties.

## **6. Arguments**

(Argument begins at page 15 of the Initial Brief of Respondents)

## 6.1. Conflict of Interest

- The appellant asserts a clear conflict of interest in this case. Judge Fant III presided over the lower court proceedings despite having prior personal connections: he is a family member of a very close friend, a Clemson University Tiger teammate, and former roommate of the appellant. Past interaction consisted of a single phone call referral by the same friend, which provided the judge knowledge of the appellant and his projects. These relationships, combined with procedural irregularities in the lower court, raise serious concerns regarding impartiality.
- Nikki Haley, former governor of South Carolina and lifetime board member of Clemson University since October 12, 2021, introduces an additional potential conflict of interest, given her prior interactions with the appellant and involvement in campus projects and expansion plans of the appellant. Her institutional role reinforces the need for careful appellate review of the lower court's decision. While her involvement could be advantageous to the appellant, given her familiarity with his work and accomplishments, it simultaneously raises concerns regarding impartiality. (See Exhibit 1, Exhibit (?) Bamberg Innovative

## 6.2. Procedural Irregularities and Misrepresentation

- A. Exhibit 1 to Respondent's Memorandum in Support of Summary Judgment is the missing affidavit, filed less than 72 hours before the hearing.
  - The affidavit was never delivered via mail, a critical procedural requirement under Pro Se status, creating a clear disadvantage for the appellant.
  - Filing in this manner violated the memorandum policies of the Greenville County Court of Common Pleas, which require adequate notice and delivery of documents to pro se litigants.
  - This procedural irregularity misled the court and prevented fair consideration of the appellant's position.
- B. The 50 pages of the 906-page architect's project manual were presented in court to Judge Fant III. These pages were relied upon by the court in making its ruling, highlighting procedural irregularities.

The respondent electronically filed the motion, February 20, 2024, stating: "...This motion will be based upon the pleadings, all discovery undertaken thus far, briefs and affidavits, which may later be submitted."
- C. The appellant's evidence and leadership role predate the architectural submissions, highlighting procedural improprieties and demonstrating the appellant's advantage in having earlier documentation of the Composite Center.
- D. Richard Smith, an independent industry partner, had executive authority over the project, granted by his consortium, beyond Dr. Pilla's positions and Fred Cartwright, CEO of CUICAR, giving additional credibility and oversight to the appellant's leadership and development of the planning "his" idea of a Composite Center, as an R&D project.
  - Smith was very proud to support his University and publicly expressed in a 2013 TV, WYFF Channel 4 - NBC interview that he was looking forward to going on this journey with CUICAR

together.

- Richard Smith and Roding were specifically recruited by the States of Georgia and South Carolina due to their unique and global expertise and extensive industry relationships, further demonstrating the strategic importance and credibility of the appellant's leadership and the Composite Center project.
  - Executive roles and key positions held by the partners changed over time, and subsequent employees did not demonstrate the same respect or loyalty, though all actions and dynamics can be witnessed and verified at trial.
  - This authority and oversight likely created jealousy and envy, illustrating the competitive and high-stakes environment in which the appellant operated.
  - The appellant consulted on and claimed misuses of grant money during the construction of the 6,200 sq. ft. designed Composite Center, reinforcing his leadership and oversight role.
- E. All letters of support, the business model to generate revenue, references uplifting CUICAR, and the feasibility concept, from the later-founded consortium partners including Roding, sent, were submitted by Richard Smith to Suzanne Dickerson at that time for coordination with the South Carolina Department of Commerce to involve the State and request funding.
- Richard Smith also brought a financing company, originated in Germany and specializing in heavy equipment financing, to the table, providing additional financial resources and credibility to the project.
  - These actions demonstrate that Richard Smith had a central and substantive role in facilitating state involvement, funding, strategic revenue planning, project feasibility, and overall support of CUICAR, underscoring his authority and leadership.
  - It is not credible to suggest that the appellant had no involvement, as these official actions required direct executive authority, coordination, and strategic oversight.
- F. The appellant's Statement of Issues on Appeal (Appellate Case No. 2024-000925), points 1–9, directly relate to these concerns:
- Conflict of Interest of Judge Fant III
  - Conflict of Interest of Nikki Haley
  - Procedural irregularities in the lower court
  - Misrepresentation of evidence by Respondent
  - Violation of Pro Se procedural rights
  - Misapplication of the statute of limitations
  - Appellant's leadership and founding role in the Composite Center
  - Public interest, diversity, and discrimination concerns

### **6.3. Personal Statement of the Appellant**

- The appellant challenges the acceptance of assumptions over incontrovertible facts and evidence by the lower court.
- Limited court experience and procedural restrictions under South Carolina law prevented the appellant from submitting additional evidentiary documents after the deposition, putting him at a structural disadvantage.
- The respondent's legal team: Failed to ask pertinent questions, suggesting a possible strategy of deliberate testing of procedural boundaries; Misrepresented the basis of the lawsuit, relying on formalistic technicalities and semantic distortions rather than addressing substantive claims.
- These failures compounded procedural unfairness, denying the appellant a full and equitable opportunity to present evidence.
- The circumstances underscore the necessity of appellate review to ensure that established facts, leadership claims, and substantive evidence are properly considered, rather than being dismissed due to technicalities or misrepresentation.

### **6.4. Evidence of Leadership and Founding Role**

- The appellant is the founder of the Composite Center, and the original idea was pitched November 10th, 2013.
- Discovery of respondent's claims occurred in July 2020, after which the statute of discovery was granted, as Judge Morgan struck down the motion to dismiss in the lower court.
- Relevant South Carolina statutes:
  - S.C. Code § 15-3-520 – limitations for actions involving contracts.
  - S.C. Code § 15-3-530(1) & (7) – discovery rule and accrual of causes of action.
  - S.C. Code § 36-2-725 – obligations under contracts and corporate authority.
- South Carolina law does not provide independent protection for research and development projects, or for founding contributions, over long-term processes such as the 10-year development of the Composite Center, leaving such contributions legally unprotected.
- The contract at issue was canceled in January 2017, coinciding with the expiration of the mutual NDA between CUICAR and Roding, emphasizing the strategic significance of the appellant's leadership.
- The appellant filed a motion for reconsideration on May 17, 2024, documenting: Conflict of Interests, Procedural irregularities. His leadership and initiative in the development of the Composite Center. Supporting evidence included Exhibit 20, Exhibit 21, court transcripts, and depositions.

- These facts demonstrate the appellant’s pioneering role, leadership, and substantial contributions to R&D, despite the absence of independent statutory protection in South Carolina law, highlighting the necessity of full appellate review to ensure equitable consideration of substantive facts. This motion includes supporting evidence (Exhibit 20, Exhibit 21).

### **6.5. Broader Public-Interest, Diversity, and Discrimination Context**

- These disputes affect public trust in taxpayer-funded institutions. CUICAR and Clemson University are funded by South Carolina taxpayers and must operate with transparency, accountability, and equity.
- The appellant’s 2022 filing included claims of racial discrimination. As an African-American alumnus, the appellant did not pursue formal NAACP procedures, but sought to address systemic inequities on campus, having experienced felt racism by Fred Cartwright and Rob Krulac.
- Observations in 2024 revealed disparities in the Deep Orange Master program:
  - Extremely limited African-American participation.
  - Extremely low participation by domestic Caucasian-American students.
  - Over 90% of students from East Asia, primarily India.
  - While diversity is supported, these figures raise questions about inclusion and equitable access.
- The appellant’s work carries public and state-level significance:
  - Recognition by former Governor Nikki Haley.
  - Meetings at the IAA.
  - Adoption of the German training program by Boeing.
  - Plans for Project Stark, a priority deal supervised the Department of Commerce
- The appellant questions the University permitting Dr. Pilla to replicate or appropriate the “Door Grant 1/1” concept (the appellant’s I<sup>3</sup> and I<sup>8</sup> Door Project) while allowing Honda’s participation, despite BMW being the largest sponsor and priority development partner during Deep Orange 7. These actions reflect misalignment in project priority, intellectual recognition, and sponsor integrity.
- Taken together, conflicts of interest, procedural missteps, misrepresentation of evidence, and public-trust concerns demonstrate that summary judgment was inappropriate, and the appellate court should permit full factual development and review.
- The appellant’s contributions include Deep Orange 5 & 7 participation (See Exhibits 1, 4, 5,).

## 6.6. Procedural Context and Opportunity to Provide Additional Information

During the lower court proceedings, the appellant was effectively “blind” to the full scope of the respondent’s submissions, including Exhibit 1 to Respondent’s Memorandum, which was filed less than 72 hours before the hearing and never received by the appellant in advance. While the appellant had access to press releases, internal communications, and other documents directly related to the respondent’s evidence, the timing and procedure of the hearing limited the ability to fully present this information in court.

After contacting the clerk, the appellant was informed that they may submit additional information and evidence to the appellate court. The appellant intends to do so, which will provide a more complete and accurate representation of the facts, clarify misleading statements in the respondent’s submission, and demonstrate that summary judgment was improper, as genuine issues of material fact remain.

Moreover, under South Carolina law, including S.C. Code Ann. § 15-3-530 and the discovery rule, the statute of limitations begins to run only when the appellant knew, or reasonably should have known, of the alleged wrongdoing. ([thelaw.com](http://thelaw.com)) The timing of discovery is a contested factual issue, reinforcing that the lower court erred in granting summary judgment.

## 6.7. Summary and Legal Implications

Taken together, the pre-textual nature of the respondent’s evidence, the procedural irregularities with Exhibit 1, the potential conflict of interest of Judge Fant III, the procedural context limiting full presentation of evidence in the lower court, establish that:

- A. Summary judgment was improper under Rule 56(c), SCRCPP, as the law requires genuine disputes of material fact to be resolved by a fact-finder, not a judge.
- B. The lower court misapplied the statute of limitations, as the timing of discovery remains a disputed material fact.
- C. The appellant is prepared to submit additional information and evidence to the appellate court, which will further demonstrate the misleading nature of the respondent’s submissions and reinforce that the law does not clearly favor one side.
- D. This issues raised are fully documented in the Appellant’s Appeal Document (July 4, 2025), specially in the Statement of Issues on Appeal, including: points 1, 2, 4, 5, 6 (conflict of interest) and 3, 4 (procedural/evidentiary concerns).

Exhibit 1 to the Respondent’s Memorandum, filed incorrectly less than 72 hours before the hearing, misled the court and prevented the appellant from a fair opportunity to respond, further obscuring the appellant’s ability to properly contest the motion.

Taken together with the broader public-interest, diversity, and discrimination context, including conflicts involving former Governor Nikki Haley as a lifetime board member of Clemson University, the procedural irregularities, and misrepresentation of evidence, these facts demonstrate that summary judgment was legally and procedurally improper, and full appellate review is warranted.

## 7.0 Conclusion

- The appellant met all statute of limitation requirements, including discovery, contract, and fraud claims.
- The lower court misapplied Rule 56, relied on misleading evidence, and failed to consider conflicts of interest.
- Personal challenges, Pro Se status, and loss of access to historical documents should not prejudice appellant's claims.
- The appellant seeks full appellate review to correct misrepresentation, preserve intellectual property rights, and establish precedent for private contributors in public-private partnerships.
- Past cumulative income impact exceeds \$1 billion, and damages claimed (\$150 million) reflect direct appropriation of credit and benefits without recognition of appellant's contributions.

### Exhibits Referenced:

Exhibit 1 – Respondent Memorandum Exhibit

Exhibit 1 - Excelsheet

Exhibit 2 - (10-18-2023)

Exhibit 3 - Deep Orange 7 Proposal, Feb 2014

Exhibit 4 – Contract Clause 5.1

Exhibit 5 – Composite Center Effectiveness/Need Note

Exhibit 6 - Memorandum of Understanding

Exhibit 7 – Meeting Documentation

Exhibit 9 – Discovery Documentation

Exhibit 10 – Founding Role Evidence

Exhibit 11 - Bamberg Innovation

Exhibit 12 - Status Joint

Deposition

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January, 12, 2026