

South Carolina Court of Appeals.

The State,

Vs.

Respondent,

Appellate # 2024-002075.

James B. Curry,

Appellant,

RECEIVED

MAY 14 2026

SC Court of Appeals

Appellants response, to respondents response, to Motion to relieve Counsel.

Appellant believes only one good reason shown would be basis to relieve Counsel, and proceed pro-se. Therefore, appellant submits the Frivolous Six Amendment right to a jury trial argued on appeal by Ms. Saxon, which was never raised by appellant, and was quickly argued by the respondent, that the issue was not preserved for appellate review. Therefore, appellant moves to relieve Counsel and proceed pro-se.

Note, the issue of Subject Matter jurisdiction (or lack of, will be argued proper by appellant, because the motion dated 6-7-24, is not Frivolous, and was an issue in respect to the order, and conviction, at the collateral proceeding.

Lack of Subject matter jurisdiction, can be raised at any time.
S.C. Dept. of Soc. Services vs. Ryan. 418 S.C. 308, 314, 792 S.E. 2d.

Respectfully Submitted.

CC:

Alan McCrory Wilson, Esq.
John Benjamin ~~Wilson~~ Aplin, Esq.
Randy Newman, Jr., Esq.
Jessica M. Saxon, Esq.

James B. Curry #186737
Perry C. I. Q3-B-220
430 Oaklawn Rd.
Pelzer, S.C. 29669

5-8-26.

RESPONDENT'S STATEMENT OF ISSUES ON APPEAL

1. Whether Appellant's argument that, by holding him in contempt of court "for perpetuity" and by imposing an aggregate fifteen months' incarceration, the trial court (1) violated his Sixth Amendment right to a jury trial and (2) unconstitutionally restricted his access to the courts, is not preserved for appellate review where it was neither raised to nor ruled upon by the lower court. Furthermore, whether, because the ordered sanction is not purely punitive and instead is contingent and intended to compel Appellant to refrain from certain acts, it constitutes civil contempt and therefore does not implicate the Sixth Amendment.

James B. Curry # 186737.
Perry C.T. Q3-B-220
430 Oaklawn Rd.
Pelzer, S.C. 29669

RECEIVED

MAY 14 2026

SC Court of Appeals

RECEIVED

MAY 12 2026

PCI MAILROOM

LEGAL MAIL

"proper response to motion to relieve Counsel."

"Attn: Ms. Jasmine D. Smith, Deputy Clerk
S.C. Court of Appeals.
P.O. Bx # 11629
Columbia, S.C. 29211