

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

APPEAL FROM SUMTER COUNTY
The Honorable W. Jeffrey Young, Circuit Court Judge

Appellate Case No. 2013-002794

Regina M. Hunter.....Appellant.

v.

Sammie Taylor.....Respondent.

MOTION TO VACATE ORDER

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SC Court of Appeals

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MOTION TO VACATE ORDER

COMES NOW, the Appellant, Regina M. Hunter, and moves that this Court vacate its June 11, 2014 order and reconsider its decision to deny reinstatement of her Notice of Appeal on multiple grounds. The primary reason being, that the Appellant did not have **public access** to the lower court to prosecute her case. Repeatedly, her access to the Circuit Court was denied on the basis of wearing a *hijab*, a headscarf worn in observance of her Islamic religious beliefs and practices. The Sumter County Circuit Court is a court of “**uniform jurisdiction**” and this Court should not accept any lower court adopting its own rules of administration or practice and procedure.

If the Court of Appeals is powerless to overcome its non-waivable statutory jurisdiction on the time limit to file a notice of appeal, then at the very least, it should grant other relief. That relief would be to exercise original jurisdiction and hear the appeal on its merits. It’s a travesty of justice that for more than **538+ days** the Appellant has been denied her day in court. Further, the handling of her appeal by both the Summary Court and Circuit Court was subject to unreasonable delays adding up to five (5) years. This Court should act now to uphold her constitutional rights.

ARGUMENTS:

Argument 01: Constitutional Right to Public Access to Courts

Argument 02: Constitutional Right to Religious Freedom

Argument 03: Due Process, Equal Protection of the Laws, and Uniform Jurisdiction

Argument 04: Unreasonable Delays—Lower Courts Noncompliance to Court Rules

Argument 05: SCACR Rules Language Distinguishes between Motion for Reinstatement and Petition for Rehearing

Argument 06: Suggestion of Rehearing En Banc not Afforded

Argument 07: Right to Perfect Appeal not Afforded

Argument 08: Timing of Interlocutory Order was Critical

Argument 1: Constitutional Right to Public Access to Courts.

- a. **S.C. Const., Art. 1, § 9** states “All courts shall be **public**, and every person shall have speedy remedy therein for wrongs sustained.” This constitutional right ensures a citizen’s **access** to state courts and **applies to all courts**, both civil and criminal. In this case, the Appellant’s public access was unconstitutionally obstructed on the basis of wearing a *hijab*, a headscarf worn in observance of her Islamic religious beliefs and practices. This obstruction and denial did not occur once, but three times. Each time, the Appellant was placed under duress and suffered financial penalties to preserve her constitutional rights inviolate.

- b. The **South Carolina Human Affairs Law §1-13-20** declares the practice of discrimination against an individual because of race, religion, color, sex, age, national origin, or disability is **unlawful**. Further, the **South Carolina Equal Enjoyment and Privileges to Public Accommodation Law §45-9-30** state the “Deprivation of right to equal enjoyment of and privileges to public accommodations [is] prohibited.” The Appellant contends that Sumter County Clerk of Court, Mr. James C. Campbell and the court bailiffs under his supervision violated the law repeatedly. Yet, these officials are not above the law. They are subject to abide by the laws of the state and the same rules of administration or practice and procedure. In early March 2013, in a telephone conversation, Mr. Campbell told the Appellant that **his** court bailiffs were supervised by Sumter County Sheriff Anthony Dennis. Yet, in his July 2, 2013 letter, Sheriff Dennis reported the court bailiffs did not report to him. Why did Mr. Campbell misrepresent his supervisory status? Was the Clerk

1) uninformed of his job responsibilities, 2) deliberately misleading the Appellant, 3) unwilling to take discipline action on his staff member or 4) incapable of handling her grievance? The Clerk of Court and Sheriff are constitutional officers and must be held to their duties and responsibilities.

- c. The May 21, 2014 Administrative Order issued by Chief Justice Jean Hoefner Toal revised the **Clerk of Court Manual** for use by all County Clerks of Court and their staff in the South Carolina Judicial System. It supersedes all previously-issued Clerk of Court Manual and is effective immediately. Part III of the manual's Introduction, titled "*Administration of Courts*", states that one of the Clerk's duties is "***staffing the courtroom while the court is in session.***" **Section 1.16** of the Clerk of Court Manual titled "**Court Security**" states the "*Clerk office personnel should be aware of courthouse security, emergency and contingency plans.*" Thus, the responsibility for disseminating security plans is an integral part of the duties of the Clerk of Court. In this case, each time the Appellant entered courthouse buildings she fully cooperated and successfully cleared metal detectors and handheld security wands. Thus, why was wearing a *hijab* grounds for restricting access? Absent any verbal or written notice of its local dress code policy or ordinances in courthouses, the Circuit Court violated her right to due process under law.
- d. Both, the Clerk of Court, Mr. Campbell and the Third Judicial Circuit Chief Judge for Administrative Purposes, Judge George C. James, Jr., failed to act, within their discretion. Therefore, the confidence the S.C. Supreme Court placed in these officials was in vain.

- e. The interlocutory order issued on February 26, 2013 [Appellate Case No. 2013-000374] by the S.C. Supreme Court instructed the lower court to “*ensure that petitioner’s right of access to the court is not unnecessarily restricted and that her religious beliefs are adequately accommodated.*” What happened to her right of access subsequent to this order? On June 17, 2013 it was **still** restricted, denied. And where there is no order, chaos exists.
- f. **S.C. Code of Laws § 14-3-330** governs the appellate jurisdiction of the Supreme Court. In Section (2) (b) it states, “The Supreme Court shall have appellate jurisdiction for correction of errors of law in law cases, and shall review upon appeal... an order that grants or refuses a new trial.” The Appellant withdraw her Motion for a New Trial, Motion to Amend/Alter Judgment because she was refused public access and concerned her safety in the Court with good cause. The Appellant also contends that her Motion for a New Trial was made under duress. The Circuit Court record reflects the S.C. Supreme Court order was entered on February 28, 2013. Thus, Judge W. Jeffrey Young could have exercised his discretion to reopen his judgment and amend his decision to let a new trial go forth. Judge Young choose not to act. Today, this Court must focus on what it can do that would not prejudice any party but aim to ensure impartiality.

Argument 2: Constitutional Right to Religious Freedom.

- a. **S.C. Const. Art. 1, § 2** states “The General Assembly shall make no law respecting an establishment of religion or prohibiting the free exercise thereof, or...any department thereof for a redress of grievances.”
- b. **S.C. Const. Art. V, § 4A** requires the submission of Supreme Court rules to judiciary committees. It states “All rules and amendments to rules governing practice and procedure in all courts of this State promulgated by the Supreme Court must be submitted by the Supreme Court to the Judiciary Committee of each House of the General Assembly during a regular session, but not later than the first day of February during each session. Such rules or amendments shall become effective ninety calendar days after submission unless disapproved by concurrent resolution of the General Assembly, with the concurrence of three-fifths of the members of each House present and voting.”
- c. The **South Carolina Religious Freedom Act, S.C. Code of Law § 1-32-30 (1)** “restore[s] the compelling interest test as set forth in *Wisconsin v. Yoder*, 406 U.S. 205 (1972), and *Sherbert v. Verner*, 374 U.S. 398 (1963), and to guarantee that a test of compelling state interest will be imposed on all state and local laws and ordinances in all cases in which the free exercise of religion is substantially burdened;” and (2) provide a claim or defense to persons whose exercise of religion is substantially burdened by the State. The Appellant argues that the exercise of her religious freedom was substantially burdened by the lower court and within a public building owned by the South Carolina State Government, Sumter County.

- d. The **South Carolina Religious Freedom Act, S.C. Code of Law § 1-32-40** states that “The State may not substantially burden a person's exercise of religion, even if the burden results from a rule of general applicability, unless the State demonstrates that application of the burden to the person is: (1) in furtherance of a compelling state interest; and (2) the least restrictive means of furthering that compelling state interest.”

Argument 3: Due Process, Equal Protection of the Laws, and Uniform Jurisdiction.

- a. The Appellant is entitled to her day in court because the constitutions of the U.S. and the State of South Carolina guarantees her constitutional rights to due process of law and equal protection of the laws. Due process means “notice”, usually written. The Clerk of Court never notified the Appellant that wearing a *hijab* was not permissible and that her access would be restricted if she did so in any of her scheduling notices. Her *hijab* was not a weapon, but religious attire.

- i. The Fourteenth Amendment, § 1 of the U.S. Constitution states, “All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall **abridge** the privileges or immunities of citizens of the United States; nor shall any State **deprive** any person of life, liberty, or property, without due process of law; nor **deny** to any person within its jurisdiction the **equal protection of the laws.**”

- ii. The Fifth Amendment of the U.S. Constitution states, in part,
“...nor shall any person...be **deprived** of life, liberty, or property,
without due process of law...”
- iii. **S.C. Const. Art. 1, § 3** states “The privileges and immunities of
citizens of this State and of the United States under this
Constitution shall not be **abridged**, nor shall any person be
deprived of life, liberty, or property without due process of law, nor
shall any person be **denied** the equal protection of the laws.” Both
the Appellant’s right to substantial and procedural due process was
violated when her public access was restricted and religious
freedoms were burdened.
- b. As previously stated, the Sumter County Circuit Court is a court of
“**uniform jurisdiction**” and this Court should not accept any lower court
adopting its own rules of administration or practice and procedure.
- c. **S.C. Const. Art. V, § 1** states “The judicial power shall be vested in a
unified judicial system, which include a Supreme Court, a Court of
Appeals, a Circuit Court, and such other courts of uniform jurisdiction as
may be provided for by general law.”
- d. Both **Rule 201 SCACR** and **Rule 72 SCRCR** states “appeal may be taken,
as provided by law, from any final judgment, appealable order or decision.
Yet, the Circuit Court took \$200 of the Appellant’s money and then
unjustifiably blocked her appeal. The lower court has refused to rectify its

egregious conduct, but *indeed Allah is the All-Knowing, All-Seeing and All-Hearing.*

- e. **S. C. Const., Art. V, § 5** states that “The Supreme Court shall constitute a court for the correction of errors at law under such regulations as the General Assembly may prescribe.” Thus, this Court has the constitutional authority to correct errors at law instead of placing a disproportionate burden upon the Appellant to redeem her freedoms.

Argument 4: Unreasonable Delays. Noncompliance to Court Rules

- a. The handling of her appeal by the lower courts was subject to unreasonable delays for almost **five (5) years**. The table below is an outline and tally of noncompliance with South Carolina Rules of Civil Procedure (SCRCP) and Magistrate Court Rules (SCMCR).

Lower Court	Unreasonable Delays¹	Non-Compliance
Summary Court	87 days	Rule 18 (b) SCMCR required the Magistrate to file her return within thirty (30) days of the date of the filing of the notice of appeal. The notice of appeal was filed on October 8, 2012. The Magistrate first return was filed 87 days later on January 4, 2013.
Summary Court	538+ days	Rule 18 (b) SCMCR permits the Circuit Court, upon good cause, to grant a definite extension of time in which to file the return. The Circuit Court record does not reflect a motion for extension of time to file a late return. The Magistrate never filed a motion.
Circuit Court	538+ days	Rule 18 (c) SCMCR required that the Circuit Court clerk give notice in writing to the parties that the return has been filed. The clerk never

¹ Actual and estimate computations. Computation of time in the Magistrate Court is governed by Rule 3 SCMCR and computation of time in the Circuit Court is governed by Rule 6 SCRCP.

		provided written notice of the Magistrate's return.
Circuit Court	27+ days	The Circuit Court " Clerk of Court Manual " § 6.3 Case Processing and § 6.4.4 Trial Roster both indicate that the clerk is required to send notice of the hearing to the attorneys or parties if pro-se. The Deputy Clerk Sherry Yow admitted in open court that she neglected to mail the Defendant's notice of the January 8, 2013 case scheduling. As a result, the case was rescheduled to the February 5, 2013.
Circuit Court	96 days	On March 12, 2013, the Plaintiff filed a form Motion for a New Trial, Motion to Alter/Amend Judgment with the Circuit Court that was not scheduled until June 17, 2013. Rule 77 (a) deems the Courts is always open for making orders.
Circuit Court	379+ Days	On June 17, 2013, the Plaintiff arrived for the motion hearing scheduled in the Circuit Court and was denied access to the courtroom for wearing a <i>hijab</i> , a headscarf worn in observance of religious beliefs and practices in blatant disregard for the S.C. Supreme Court's February 26, 2013 order in Appellate Case No. 2013-000374 .
Circuit Court	78 days	The Circuit Court rescheduled the June 17, 2013 motion hearing for September 3, 2013 without apology, explanation or assurance for the Appellant safety in the building.
Circuit Court	78 days	The Circuit Court Clerk of Court deliberately withheld mailing notice and a receipt for the \$25 motion fee for its August 27, 2013 written judgment that granted the Appellant's Motion to Withdraw until November 8, 2013. The Appellant sought intervention from the S.C. Supreme Court Clerk of Court, Daniel E. Shearouse to receive a copy. ²
TOTAL	1,821 days or 5 years	

² On April 15, 2014 a Rule 77(d) was amended to require the Clerk of Court to provide notice immediately upon the entry of an order or judgment.

- b. The Appellate Court's opinion is that the Appellant's Motion to Withdraw the Motion for a New Trial, Motion to Alter/Amend Judgment did not toll the time for appeal. Yet, this opinion is contrary to the SC Supreme Court orders issued on February 26th and June 28, 2013 which stated her concerns should first be raised to the county clerk of court, and if necessary to the Third Judicial Circuit Chief Judge for Administrative Purposes.
- c. At the same time, the Appellant was placed under emotional and financial duress. On June 17, 2013 she was treated at Tuomey Healthcare System Emergency Department for chest pain after she tirelessly sought escort into the courthouse from both the Sumter Police Department and Sumter County Sheriff's Office to no avail.

Argument 5: SCACR Rules Language Distinguishes between Motion for Reinstatement and Petition for Rehearing

- a. Both a motion and petition is a request to the Court to make a ruling or take some action, but are often subject to different requirements or procedures. Rule 240 SCACR governs all motions and petitions submitted to the appellate court generally. However, Rule 240 (a) SCARC states "*Where Rules 241 through 246 provide different or additional requirements or procedures, those requirements or procedures shall apply.*" In this case, beyond Rule 240 and Rule 267, the other rules that govern a petition for rehearing are Rules 221 (b) (1), Rule 260, and Rule 262 SCACR.

b. For example, in Rule 262 (a) the words petitions for rehearing and motions for reinstatement, are listed distinctly, not wholly the same. Rule 262 further cross references Rules 221 and Rule 260 that again use separate and distinct language.

- i. **Rule 262(a)** cross references **Rule 221 (a)** that requires “*Petitions for rehearing must be actually received by the appellate court no later than fifteen (15) days after the filing of the opinion, order, judgment, or decree of the court.*”
- ii. **Rule 221(a)** further states “*A petition for rehearing shall be in accordance with Rule 240, and shall state with particularity the points supposed to have been overlooked or misapprehended by the court.*”
- iii. **Rule 262(a)** also cross references **Rule 260 (a)** which states “*Whenever it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court. A case shall not be reinstated except by leave of the court, upon good cause shown, after notice to all parties. The clerk shall remit the case to the lower court or administrative tribunal in accordance with Rule 221 unless a motion to reinstate the appeal has been actually received by the court within fifteen (15) days of filing of the order of dismissal (the day of filing being excluded).*”

- c. The Appellant's notice of appeal was not dismissed by the Clerk of Court but rather Associate Judge Jasper M. Cureton in his March 3, 2014 order. The Appellant construes Judge Cureton's order and the Clerk of Court power of dismissal under Rule 221 **as one and the same** and thus followed the remedy prescribed under Rule 221. Her notice of appeal was subject to remittitur "*unless a motion to reinstate the appeal*" was actually received by the Court within 15 days.
- d. The Appellant did not file a "Petition for Rehearing" because Rule 221 does not indicate such remedy in reference to **Rule 203 (b) (1)**. She also understood from Judge Cureton's order that her case ran up against the non-waivable statutory jurisdictional requirement of the Court of Appeals to review the lower court's decision. This Court cannot maintain an opinion that the Appellant's lack of public access is irrelevant.

Argument 6: Suggestion of Rehearing en banc Not Afforded

- a. **Rule 219 (b) SCACR** allows a moving party to suggest a matter be heard en banc in writing 20 days prior to hearing date. This Court's decision to construe her Motion for Reinstatement as a Petition for Rehearing without adequate notification to both parties is unfair. It also unfairly denied the Appellant's right to request a Rehearing en banc in writing. The Appellant understands that this Court, upon its discretion, could require the Respondent to file a return or request oral arguments, yet it has asked neither. Rather, this Court heard the Appellant motion without an en banc vote. Does not each judge's vote and opinions count?

- b. Her case deserves the attention of all judges, on the record, because the Sumter County Circuit Court local, non-uniform rules are inconsistent with the constitutions of the United States and State of South Carolina.

Argument 7: Right to Perfect Appeal not Afforded

- a. The Appellant was unfairly denied the opportunity to perfect her appeal when the Court refused to consider her motion to amend the Motion for Reinstatement. The Supreme of the United States found that pro-se appellants must be given the opportunity to perfect defects in pleadings. In *Platsky v. C.I.A.* 953 F.2d. 25 (1991) the U.S. Supreme Court stated “Pro se plaintiffs are often unfamiliar with the formalities of pleading requirements. Recognizing this, the Supreme Court has instructed the district courts to construe pro se complaints liberally and to apply a more flexible standard in determining the sufficiency of a pro se complaint than they would in reviewing a pleading submitted by counsel.” Therefore, this Court should vacate its June 11th order and give the Appellant ample time to amend her Motion for Reinstatement and submit a Petition for Rehearing en banc.

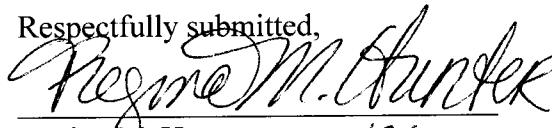
Argument 8: Timing of Interlocutory Order was Critical

- a. **S.C. Const. Art. V, § 20** states “Each of the Justices of the Supreme Court and judges of the Court of Appeals and Circuit Court and of all other courts of record shall have the same power at chambers to issue writs of habeas corpus, mandamus, quo warranto, certiorari, prohibition, and interlocutory writs or orders of injunction as when in open court.”

- b. On February 26, 2013, the S.C. Supreme Court issued an interlocutory order requiring the lower court to accommodate and not unnecessarily burden the Appellant's religious practices. The timing of this order is critical as it specifically dealt with the Appellant's public access to the courthouse and its facilities. The Appellant did not receive written notice of the order until February 27-28, 2013, 1-2 days after the Circuit Court hearing. Further the continuance granted by Judge R. Ferrell Cothran, Jr. was contingent on the resolution of her grievance about her constitutional rights.
- c. The Court should also consider that Mr. Campbell, Clerk of the Circuit Court did not address her grievance in writing until March 6, 2013. His March 6th letter was inadequate and did not provide assurances that the Appellant's access to the courthouse and its facilities would not be restricted based on her religious attire. The letter also failed to address the verbal assault and intimidation the Appellant was subject too.

WHEREFORE, the Appellant, requests that this Court vacate its June 11th order and reinstate of her notice of appeal based on the violation of her constitutional rights. *Indeed, Allah is Best Disposer of Affairs.*

July 9, 2014
12 Ramadan, 1435 A.H.

Respectfully submitted,

Regina M. Hunter
3390 Highway 261 North
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(803) 883-0600
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Appellant, Pro-Se

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Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

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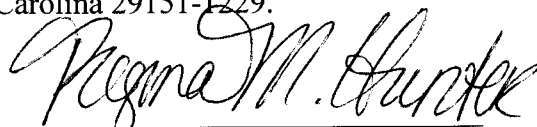
Sammie Taylor,

Respondent.

PROOF OF SERVICE (1)

In the name of Allah, the Most Gracious, the Most Merciful, I certify that I have served the Motion to Vacate on Sammie Taylor by depositing a copy of it in the United States Mail, postage prepaid, on July 9, 2014, addressed to his attorney of record, Dwight C. Moore, Moore Law Firm, 26 North Main Street, P.O. Box 1229, Sumter, South Carolina 29151-1229.

July 9, 2014
12 Ramadan, 1435 A.H.


Regina M. Hunter
3390 Highway 261 North
Rembert, SC 29128-8540
(803) 883-0600
Appellant

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W. Jeffrey Young, Circuit Court Judge

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Regina M. Hunter,

Appellant.

v.


Sammie Taylor,

Respondent.

PROOF OF SERVICE (2)

In the name of Allah, the Most Gracious, the Most Merciful, I certify that I have served the Motion to Vacate on the Circuit Court by depositing a copy of it in the United States Mail, postage prepaid, on July 9, 2014, addressed to the Clerk of Court, James C. Campbell, 215 North Harvin Street, Sumter South Carolina 29150.

July 9, 2014
12 Ramadan, 1435 A.H.


Regina M. Hunter
3390 Highway 261 North
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(803) 883-0600
Appellant

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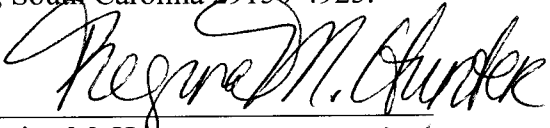
Sammie Taylor,

Respondent.

PROOF OF SERVICE (3)

In the name of Allah, the Most Gracious, the Most Merciful, I certify that I have served the Motion to Vacate on Sumter County South Carolina Government by depositing a copy of it in the United States Mail, postage prepaid, on July 9, 2014, addressed to its attorney of record, Johnathan W. Bryan, 13 East Canal Street, Administration Building, Sumter, South Carolina 29150-4925.

July 9, 2014
12 Ramadan, 1435 A.H.


Regina M. Hunter
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