

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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

Appellate Case No. 2014-001508

Regina M. Hunter.....Appellant.

v.

Sammie Taylor.....Respondent.

APPENDICES
for
Petition for Writ of Certiorari

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JUL 23 2014
S.C. Supreme Court

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Appendix A

Petition for Writ of Certiorari

Appellate Case No. 2014-001508

APPENDIX
A

The South Carolina Court of Appeals

Regina M. Hunter, Appellant,

v.

Sammie Taylor, Respondent.

AND

Regina M. Hunter, Appellant,

v.

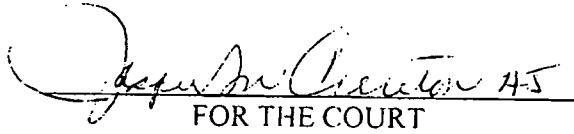
Sammie Taylor, Respondent.

Appellate Case No. 2013-002646

ORDER

On December 16, 2013, Appellant served a notice of appeal from a February 26, 2013 order of Judge Young dismissing the case due to failure to prosecute. On August 27, 2013, Judge Young issued an order granting Appellant's request to withdraw her motions for a new trial and to alter or amend judgment. Pursuant to Rule 203 of the South Carolina Appellate Court Rules, a notice of appeal must be served within thirty days after written receipt of the entry of the order or within thirty days of written receipt of the order *granting or denying* a timely motion to alter or amend or a motion for a new trial. Here, Judge Young neither granted nor denied her motion to alter or amend or motion for a new trial; rather, Judge Young allowed Appellant to withdraw those motions. Accordingly, the time for service of the notice of appeal was not tolled by the filing of the motion to alter or amend or motion for a new trial. Because Appellant has failed to timely serve the notice of appeal, this appeal is dismissed.

Because this appeal is dismissed, this court declines to act on Appellant's pending motions.


FOR THE COURT

Columbia, South Carolina

FILED

cc:
Regina M. Hunter
Dwight Christopher Moore, Esquire
Regina M. Hunter

3/3/14 EAC

Appendix B

Petition for Writ of Certiorari

Appellate Case No. 2014-001508

APPENDIX
B

The South Carolina Court of Appeals

Regina M. Hunter, Appellant,

v.

Sammie Taylor, Respondent.

AND

Regina M. Hunter, Appellant,

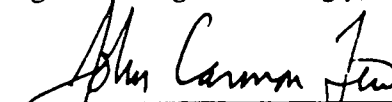
v.

Sammie Taylor, Respondent.

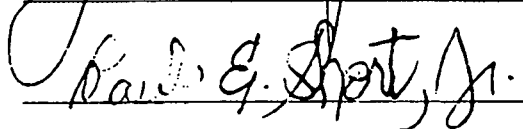
Appellate Case No. 2013-002646

ORDER

In a March 3, 2014 order, this Court dismissed this appeal because Appellant failed to timely serve Respondent with the notice of appeal. Subsequently, Appellant has filed what this Court construes as a petition for rehearing. After careful consideration of the petition for rehearing, the Court is unable to discover that any material fact or principle of law has been either overlooked or disregarded, and hence, there is no basis for granting a rehearing. Accordingly, the petition for rehearing is denied.¹



C.J.



J.

¹ This Court also declines to act on Appellant's motion to file an amended petition for rehearing.

James M. Hunter A.J.

Columbia, South Carolina

FILED
6/11/14

cc:
Regina M. Hunter
Dwight Christopher Moore, Esquire
Regina M. Hunter

Appendix C

Petition for Writ of Certiorari

Appellate Case No. 2014-001508

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

71613

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 FOR REINSTATEMENT

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SC Court of Appeals

PARTIES TO THE PROCEEDING

The Petitioner, here and in the South Carolina Court of Appeals, is a citizen of the United States of America.

The Respondent here is, as follows: Sammie Taylor. The Counsel on Record is Dwight C. Moore, Esquire.

The other parties to the matter before the Court are The Honorable James C. Campbell, Sumter County Clerk of Court, The Honorable W. Jeffrey W. Young, Third Circuit Judge, and The Honorable Kristi F. Curtis, Chief Magistrate for Sumter County Summary Court.

The Petitioner contends that Sumter County South Carolina Government is an interested party.

- 1) The County of Sumter is a political subdivision of the State of Carolina; a "body politic and corporate" according to S.C. Code § 4-1-10.
- 2) The Sumter County South Carolina Government is established and authorized under S.C. Code § 4-9-30.¹ The County of Sumter is listed as the 100% tax-exempt owner of Sumter County Judicial Center on the property card available online.² The parcel number is 2490902002.
- 3) The County has covenanted to comply with requirements of the nondiscriminatory regulations of the Internal Revenue Code of 1986, in the conduct of business when it issued municipal bonds against the full faith, credit, resources and taxing power of the County.

1: Sumter County South Carolina Government, About Us: Laws Governing Sumter County South Carolina, available at <http://www.sumtercountysc.org/?Q=about/laws-governing-sumter-county-south-carolina>. (Last Visited March 14, 2014).

2: Sumter County South Carolina Government, Sumter County, Electronic Government Access, Property Cards, available at <http://www.sumtercountysc.org:8080/egsv2smtr/pcsearch.do>. (Last Visited March 14, 2014).

TABLE OF CONTENTS

TABLE OF AUTHORITIES.....	4
JURISDICTION.....	5
REASONS FOR GRANTING PETITION.....	6
Exhaust Administrative Remedies Doctrine.....	7
Inconsistent Security Policies in Courthouse Buildings.....	11
Lack of Uniformity of the Courts Decisions.....	14
Substantial Constitutional Issues Are Involved.....	15
Abuse of Discretion in Lower Courts.....	18
Reinstatement Would Not Prejudice Any Party.....	19
Delay Not Due to Petitioner's Culpable Negligence.....	20
Petitioner's Rights in Circuit Court Was Affected by Race or Color.....	21
Supreme Court Exercised Personal Jurisdiction Over the Parties.....	23
Denial of Petitioner's Right to Prosecute.....	24
Circuit Court Clerk Breach of Responsibilities to Perform Services.....	25
APPENDIXES.....	27-40

TABLE OF AUTHORITIES

Cases

Hunter v. Taylor, 2012-CP-43-01965, 15

Statutes

Civil Rights Act of 1964, Title II & III, Public Accommodations and Facilities,
Voting Rights Act of 1965

SC Human Affairs Law

SC Equal Enjoyment and Privileges to Public Accommodation Law § 45-9-30

South Carolina the Religious Freedom Restoration Act of 1993

South Carolina Victim's Bill of Rights Act

Other Authorities

U.S. Const. amend I

U.S. Const., amend XIV, § 1

U.S. Const., amend V

S.C. Const, Art. I, § 2, § 3

S.C. Const, Art. V, § 4

S.C. Const, Art. V, § 20

S.C. Code Ann. § 14-8-200 (a) (1979)

S.C. Code Ann. § 14-8-260 (1979)

S.C. Code Ann. § 4-1-10 (1976)

S.C. Code Ann. § 4-9-30

S.C. Code Ann. § 14-1-100 (1962)

S.C. Code Ann. § 18-9-270

S.C. Code Ann. § 23-11-20

S.C. Code Ann. § 16-17-560, 1 (a)

S.C. Code Ann. § 40-5-80

S.C. Code Ann. § 14-15-210, § 14-9-100

Court Rules

Rule 204 (a), SCACR

Rule 221, SCACR

Rule 219 (b), SCACR

Rule 240 (j), SCACR

Rule 260, SCACR

Rule 59 (a) (b) (e), SCRCP

Rule 52 (b), SCRCP

JURISDICTION

Pursuant to Rule 204(a), SCACR, The Supreme Court of South Carolina transferred this appeal to the South Carolina Court of Appeals in an order dated January 3, 2014. Accordingly, under S.C. Code Ann. § 14-8-260 (1979), this Court has jurisdiction “in the event the Supreme Court determines that a notice of appeal should have been filed with the court of appeals, it shall issue an order transferring the case to the court of appeals.”

Accordingly, under S.C. Code Ann. § 14-8-200, this Court has jurisdiction “over any case in which an appeal is taken from an order, judgment, or decree of the circuit court...”

On March 3, 2013, the Court issued and filed an order to dismiss the notice of appeal. Rule 260, SCACR vest appellate jurisdiction with the Court of Appeals to reinstate case upon good cause shown, after notice to all parties, when a motion to reinstate the appeal has been actually received by the Court within fifteen (15) days of the filing of order of dismissal (the day of filing being excluded).

Further, under S.C. Code Ann. § 18-9-270, this Court has the authority to “reverse, affirm or modify the judgment, decree, or order appealed in whole or part and as to any or all of the parties...” with remittitur to the lower court for enforcement according to law.

ARGUMENTS
[Statement of Points]

With the Name of Allah, Most Gracious, Most Merciful, Pursuant to Rule 260, SCACR, Appellant, Regina M. Hunter, respectfully petitions this Honorable Court for the reinstatement of her Notice of Appeal with extraordinary good cause.

Although the Court dismissed the Petitioner's Notice of Appeal for failure to timely file, pursuant to Rule 203 (d), (3), SCACR, the case should be reinstated under Rule 260, SCACR with extraordinary good cause. The Petitioner understands the timely notice of appeal is a non-waivable jurisdictional requirement and sets forth her reasons why a reinstatement should be granted below.

- Argument 1: Exhaust Administrative Remedies Doctrine
- Argument 2: Inconsistent Security Policies in Courthouse Buildings
- Argument 3: Lack of Uniformity of the Courts Decisions
- Argument 4: Substantial Constitutional Issues Are Involved
- Argument 5: Abuse of Discretion in Lower Courts
- Argument 6: Reinstatement Would Not Prejudice Any Party
- Argument 7: Delay Not Due to Petitioner's Culpable Negligence
- Argument 8: Petitioner's Rights in Circuit Court Was Affected by Race or Color
- Argument 9: Sumter County Government, a "Body Politic & Corporate" is an Interested Party
- Argument 10: Supreme Court Exercised Personal Jurisdiction Over the Parties
- Argument 11: Denial of Petitioner's Right to Prosecute Her Matter on Her Own Behalf
- Argument 12: Circuit Court Clerk Breach of Responsibilities to Perform Services

Argument I: EXHAUST ADMINISTRATIVE REMEDIES DOCTRINE

- 1) The Court should reinstate the case because despite Petitioner's adherence to The Supreme Court of South Carolina's formula for redress of her constitutional rights, the lower court continued to restrict and burden the exercise of her religious freedoms on June 17, 2013. A copy of the February 26, 2013 Supreme Court order is attached (see Appendix A).
 - a) The February 26, 2013 order instructed the Petitioner to address her concerns with the Clerk of Court, Mr. James C. Campbell and then if necessary, the Third Circuit Administrative Judge, the Honorable George C. James.
 - b) On March 6, 2013, the Clerk of Court sent a vague, non-specific letter that failed to address the court bailiff's conduct. The letter neither provides assurance for her safety from reprisals (see Appendix B).
 - c) In his letter dated April 29, 2014, Judge James failed to exercise his authority to remove the court bailiff (see Appendix C)
- 2) After suffering assault and intimidation on account of wearing her hijab, the Petitioner was justifiably concerned for her safety and acts of reprisal. On June 20, 2013, she sought and was denied a stay of proceedings in the June 28, 2013 South Carolina Supreme Court order. Thereafter she sought the intervention of more than seven state government agencies for more than six months to no avail.
- 3) The Petitioner, in good faith, sought the intervention of 1) The Sumter County Sheriff's Office; 2) The Sumter County Council; 3) The Governor, Office of the Governor; 4) The South Carolina Governor's Office of the Ombudsman; 5) The South Carolina Court Administration; 6) The Office of the Governor, State Office of Victim Assistance and 7) The South Carolina Human Affairs Commission.
- 4) Reinstatement should be granted because the Court was not briefed on the statuses of the Petitioner's complaints of religious and racial discrimination with multiple federal and state agencies. Herein, the Petitioner provides supplemental information of the outcomes that the Court did not consider.

- a) Sumter County Sheriff, Mr. Anthony Dennis, refused to charge the bailiff or even issue a complaint number for the record although the Petitioner filed an online complaint (for a copy of his letter July 2, 2013 see Appendix D).
- b) On July 5, 2013, the Petitioner wrote and received no response from Sumter County Council, Chair, Mr. Larry Blanding. The Petitioner asked the Sumter Council under its current leadership to support religious freedoms and its own Proclamation issued on September 17, 2012 titled "*Citizenship Day and Constitution Week*" (see Appendix E) in conjunction with the national commemoration. Disappointingly, the Petitioner did not hear from the Council Chairman, Mr. Larry Blanding. On September 23, 2013, the Petitioner wrote and received no response from Sumter County Council Member, District 1 representative, Mrs. Naomi Sanders.
- c) The Honorable Governor Nikki R. Haley, Office of the Governor cited the separation of powers doctrine and has declined intercession. The offices of the Governor have also yielded no resolutions.
- d) In her June 26, 2013 letter, Mrs. Debra Depra Curtis, Crime Victim's Ombudsman stated the Petitioner's complaint was outside the statutory jurisdiction of her office and forwarded the complaint to Court Administration (see Appendix F).
- e) On February 24, 2014, Mrs. Lena Grant, Program Assistant for the Office of the State Ombudsman confirmed that Court Administration received the Petitioner's information in their office on June 27, 2013. However, Mrs. Rosalyn W. Frierson, Director of Court Administration is mute towards the Petitioner and remains so now for nine months (see Appendix G).
- f) The Petitioner spoke with Dr. Larry Barker in The Office of the Governor, State Office of Victim Assistance. Dr. Barker, a very kind person, suggested contact with the State Ombudsman and Court Administration. Although helpful, as stated above both of these venues for dispute resolution were dead ends.
- g) Additional evidence that the Petitioner has exhausted her administrative remedies to address and resolve her complaint of discrimination with the Sumter County

Court of Common Pleas is illustrated by the "Notice of Right to Sue" issued by the South Carolina Human Affairs Commission on February 21, 2014. The Commission was unable to resolve the charge of discrimination made on July 22, 2013 (see Appendix H).

- 5) The Petitioner's also sought assistance on the federal level. She contacted the U.S. Department of Health and Human Affairs (DHHS) from the onset of her grievance. The DHHS Office of Civil Rights transferred the Petitioner's correspondence to the U.S. Department of Justice (DOJ), Civil Rights Division. When the Petitioner had not heard from DOJ after the brief government shutdown in October 2013, she wrote a follow-up letter to the Attorney General of the United States, Eric J. Holder, Jr. Mr. Michael L. Alston, Director of the U.S. DOJ, Office of Justice Programs—Office for Civil Rights (OJP-OCR) replied on October 24, 2013 (see Appendix I). Subsequently the Petitioner filed a formal complaint with the DOJ, Office for Civil Rights, Office of Justice Programs on February 21, 2014. The complaint is pending.
- 6) The exhaustive of remedies is a rule of comity, or courtesy.³ Then and now, it is the intention of the Petitioner to resolve her grievance with the lower court without litigation. Yet the lower court remains mute, unapologetic, non-conciliatory and unwilling to take corrective measures to prevent civil rights violations from occurring again.
- 7) At present, it is the Petitioner's belief the Commission improperly handled the her complaint depriving the Petitioner of the ability to develop a good case file from written statements, documents, exhibits and other items pertinent to the subject matter.
- 8) Further, the Petitioner has wrote to the Commission and Chair, Mr. John A. Oakland for reexamination with copy to the chairs of the SC House Ways and

1) West's Encyclopedia of American Law, edition 2. Copyright 2008 The Gale Group, Inc. All rights reserved; available at <http://legal-dictionary.thefreedictionary.com/Exhaustion+of+Remedies>. (last visited March 18, 2014).

Means Committee and the SC Senate Finance. The Commission and board are established and derives its statutory authority from the SC Human Affairs Law— act of the State General Assembly appearing as Chapter 13 of Title I of the 1976 Code, as amended.

Argument 2: INCONSISTENT SECURITY POLICIES IN COURTHOUSE BUILDINGS

- 1). The Petitioner was not obstructed in county's Summary Court, but in the Circuit Court. It is a fact that there are two different security practices towards public access to judicial services in Sumter County courts.
 - a. In actions before the Summary Court located at 1115 North Harvin Street, the Petitioner was not required to pass through a metal detector or subject to a metal detector wand device screening.
 - b. In the building at 1115 North Harvin Street, the Petitioner was able to bring her cell phone into the building and the contents of her personal belongings were not scrutinized or ever searched upon entry or randomly thereafter.
 - c. In Summary Court, the civil desk is located down a long corridor whereby patrons pass by offices occupied by Magistrates and other court personnel. In the Petitioner's opinion, this is not safe for the judges, court employees or the public.
 - d. The only time the Petitioner recalls she encountered deputy sheriffs is when Summary Court is in session and a judge is on the bench. Even then, the Petitioner only observed one deputy in a court populated by over 25 plus persons at roll call.
 - e. In the former building at 141 N. Main Street and the new Judicial Center at 215 North Harvin Street, the Petitioner observed multiple sheriff deputies and metal detectors at every entry point to the buildings and was subject to search.
 - f. In the Summary Court, the Petitioner observed persons become verbally aggressive and upset when making traffic ticket payments and annoyed with Magistrates on the bench while court is in session. On particular occasion, in a matter before the Court, the Petitioner was concerned for her own safety as well.
 - g. Were judges, court personnel and public safety in the building housing the Summary Court of less regard than the judges, court personnel and public in the former and new Circuit courthouse building? What impact, if any, did these

varying security policies bear on the Petitioner's ability to prosecute her appeal without unnecessary burdens upon her religious freedoms?

- i). On February 5, 2013, although the Petitioner successfully cleared security screening, Mr. Joseph Bradley, the head court bailiff, further security interrogation on the third floor indicates he lacked confidence in the Circuit courthouse's own security protocols.
- 2). In contrast to the Circuit Court, in the Summary Court, no judge or court personnel asked the Petitioner to ever remove her *hijab* or questioned why the Petitioner wore it. The free exercise of the Petitioner's religious beliefs was not restricted or burdened in the Summary Court building. Yet, the policies and treatment experienced in the Circuit courthouses were the complete antithesis. The experience of two different public access policies was then and still is perplexing.
- 3). In the July 2013 quarterly edition of "County Focus" the editor W. Stuart Morgan, III wrote the cover page article on the new Sumter County Judicial Center and Sheriff's Office. Mr. Morgan stated that:
 - a. "Sumter County's previous courthouse, built in 1907, was remodeled and enlarged during the early 1960s. But the historic courthouse was not designed to handle all of the security needs required under federal and state law for judges, court staff and jurors. In fact, the S.C. Supreme Court in recent years had directed counties across the state to address safety issues in courthouses."⁴
 - b. In the article, Mr. James Campbell alludes to the security deficiencies in the old building. He stated:
 - i). "It has been designed to meet the needs of our court staff, judges, attorneys and the public. It features advanced security and technological systems that should help ensure the utmost safety for all staff and court personnel, and the public."⁵
- 4). The August 31, 2005 SC Court Administration Court News reports on the creation of County Court Security Committees established to address security concerns pursuant

⁴ W. Stuart Morgan, III, Editor. "Sumter County's New Judicial Center and Sheriff's Office." County Focus Magazine. South Carolina Association of Counties. July 2013, p. 7.

to the provisions of SC Constitution, Art. V, §. 4. In part, the order (see Appendix J), signed by Chief Justice Jean Hoefner Toal states:

- a. "Each Court Security Committee shall be responsible for performing a security audit of each building where court is held. A comprehensive checklist will be provided to each committee to perform the assessment. The committee will also be responsible for developing a security plan for every facility where court is held."
- b. At the time of this filing, the Petitioner has made a Freedom of Information Act request to the SC Court Administration for the right to inspect and copy of the Sumter County courthouses security plans as drafted and amended.
- c. The Petitioner hereby request leave of court to appendix those security plans, with notice to parties, if available before a decision, judgment, order is rendered by the Court.

ARGUMENT 3: LACK OF UNIFORMITY OF THE COURTS DECISIONS

- 1) Albeit a seemingly late appeal, the Court of Appeals decision to dismiss lacks uniformity with prior decisions of the Supreme Court. The Supreme Court prescribed a roadmap to a resolution to the Petitioner's grievance while the Court's dismissal order had the effect of finally deciding the Petitioner's appeal.
- 1) It was reasonable and fair for the Petitioner to seek the assistance of third parties to mediate her grievance with Court of Common Pleas. The circuit court clerk did not respond in writing to the Petitioner's grievance until March 6, 2013 after the Supreme Court ruling was made on February 26, 2013. Finding his response nonspecific and inadequate pertaining to the verbal assault and intimidation suffered on account of the free exercise of her religious freedoms, the Petitioner wrote the Third Circuit Administrative Judge George C. James. Likewise, his response was appalling and very disheartening. Instead of condemning discriminatory treatment, he instead lauded the court bailiff.
- 2) Similarly, circuit Judge Young's unwillingness to exercise his discretion to reopen his judgment, amend his decision or take new findings at his own discretion conflicts with February 26, 2013 Supreme Court of South Carolina order.
- 3) The Supreme Court's February 26, 2013 order and the Sumter County Court of Commons Pleas February 26, 2013 judgment in the matter *Hunter v. Taylor*, 2012-CP-43-01965 occurred concurrently. The Petitioner was grateful to hear from the Supreme Court in writing as there was no written response from the lower clerk prior to the matter of *Hunter v. Taylor* being placed back on the appeals roster.
- 4) The Court of Appeals' order of dismissal overlooks the formula prescribed by the Supreme Court and the steps taken by the Petitioner to adhere to his formula.

Argument 4: SUBSTANTIAL CONSTITUTIONAL ISSUES ARE INVOLVED

Below, the Petitioner delineates the substantial constitutional issues involved in her claim of discriminatory treatment based on religion and race.

1. Petitioner asserts the violation of her First Amendment Rights, U.S. Constitution.
2. Petitioner asserts the violation of her Fourteenth Amendment Rights, U.S. Constitution.
3. Petitioner asserts the violation of her Fifth Amendment, U.S. Constitution;
4. Petitioner asserts violation of her civil rights, under The Civil Rights Act of 1964, Title II, and Title III, (as amended) Public Accommodations and Facilities—prohibits discrimination in places of public accommodation because of race, color, religion, or national origin. Public facilities are facilities owned, operated or managed by state or local governments, like courthouses or jails.
5. Petitioner asserts violation of The Voting Rights Act of 1965 (as amended) which prohibits discrimination in voting practices or procedures because of race and color. The Act also prohibited literacy tests and poll taxes, which had been used to prevent blacks from voting.
6. Petitioner asserts violation of her liberty under Article 1, Section 3 of the South Carolina Constitution states, in part—
 - "...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."
7. Petitioner asserts violation of 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
8. Petitioner asserts violation of The South Carolina Equal Enjoyment and Privileges to Public Accommodation Law: §45-9-30 the "Deprivation of right to equal enjoyment of and privileges to public accommodations [is] prohibited."—

- “No person shall withhold, deny, or attempt to withhold or deny, or deprive, or attempt to deprive any person of any right or privilege secured by the provisions of Section 45-9-10; or intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person with the purpose of interfering with any right or privilege secured by the provisions of Section 45-9-10; or punish or attempt to punish any person for exercising or attempting to exercise any right or privilege secured by the provisions of Section 45-9-10.”

9. Further, according to SC Equal Enjoyment and Privileges to Public Accommodations Law, §45-9-10(A) and (C), S.C. Code of Laws:

- “(A) All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation, as defined in Article 1 of this chapter, without discrimination or segregation on the ground of race, color, religion, or national origin.”
- (C) “Supported by state action” means the licensing or permitting of any establishment or any agent of an establishment listed above, subject to the exclusion provided in Section 45-9-20, which has or must have a license or permit from the State, its agencies, or local governmental entities, to lawfully operate.”

10. Petitioner asserts violation of The South Carolina Religious Freedom Act—§ 1-32-40 titled: “Restriction on state’s ability to burden exercise of religion” states:

- “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.

11. The South Carolina Victim's Bill of Rights, Art. 1, §24 (A) preserves and protects victims' rights to justice and due process regardless of race, sex, age, religion, or economic status. It further defines a 'victim' as "a person who suffers direct or threatened physical, psychological, or financial harm as the result of the commission or attempted commission of a crime against him." Despite sufficient evidence the Sumter County Sheriff's Office failed to conduct a full and complete investigation.

Argument 5: ABUSE OF DISCRETION IN LOWER COURTS

- 1) Judge W. Jeffrey Young, under Article V, Sec. 20 of the South Carolina State Constitution had the same powers in Chamber as in open court.
 - a. Judge Young should have decided the Petitioner's the Motion for a New Trial, Motion to Alter or Amend Judgment in chamber to expeditiously discharge an appeal of a complaint of harassment and stalking from the Summary Court.
 - b. The Petitioner originally submitted a form motion to be heard in chamber on March 13, 2013. However, at its discretion, the at-large Judge W. Jeffrey Young, Jr. decided not to render decision in chamber, but deliberately delayed a complaint regarding harassment for more 85+ days.
 - c. Deputy Clerk, Sherry Yow admitted in open court that she failed to issue notice of hearing to the Respondent for the January 8, 2013 hearing. The Deputy Clerk further failed to indicate the correct date and time stamp on the Petitioner's March 13, 2013 filing, and did not process the Petitioner's form motion.
- 2) Chief Magistrate Kristi F. Curtis, a party to the appeal before the Circuit Court, did not within her own discretion, recuse herself from hearing the Petitioner's second complaint of harassment/stalking, but rather mishandled the Petitioner's right to notice of hearing.
- 3) Was it a conflict of interest for the Chief Magistrate Curtis to presiding over the second complaint of harassment/stalking when the Summary Court was a party to the matter on appeal in the Circuit Court?

Argument 6: REINSTATEMENT WOULD NOT PREJUDICE ANY PARTY

- 1) A reinstatement of the case would not prejudice any party because the constitutional issues surrounding the Petitioner's access to the courts do not pertain to the subject-matter in *Hunter v. Taylor*, 2012-CP-43-01965, before the lower court.
- 2) Judge Young's order to dismiss the appeal for failure to prosecute was premature, in consideration of the concurrently Supreme Court order issued on February 26, 2013.
- 3) The Petitioner believes that failure to prosecute should be reserved for egregious situations where the party has repeatedly failed to comply with SCRCP.
- 4) As the lower court(s) case history demonstrates, it's the Respondent who repeatedly failed to appear. The case history demonstrates that Petitioner fulfilled her obligation to diligently pursue the prosecution of my appeal in a timely fashion until her ability to do was obstructed, hindered, impeded, hampered by discriminatory treatment on the basis of religion and race.

ARGUMENT 7: DELAY NOT DUE TO PETITIONER'S CULPABLE NEGLIGENCE

- 1) The Petitioner worked to save the case, the delay is not due to the Appellant's culpable negligence.
 - a. The Petitioner contends that there is ample evidence that she diligently prosecuted her case.
 - b. The Plaintiff's track record of compliance with rules pertaining to service upon the Defendant is a fact.
 - c. As a Plaintiff, in circuit court, she respectfully move the Court for an order for a new trial or to alter or amend judgment, pursuant to Rule 59(a), (b), (e) SCRCP which permits the Court to take additional testimony, to amend or make new findings and conclusions of law, and direct the entry of a new judgment. Her motion was filed in accordance with Rule 59(b) and Rule 52(b) SCRCP that requires in non-jury matters that a motion be made within 10 days after receipt of written notice of entry of judgment or of the filing of an order disposing of the action.
 - d. The Plaintiff was present at the hearing schedule on January 8th when the Clerk's office omitted sending notice to the Defendant.
 - e. On February 8th, the Plaintiff moved for a continuance in open court when distraught over treatment from court personnel.
- 2) Indeed, the Plaintiff was not slack concerning the prosecution on her case, but vigilant. Plaintiff's rights to prosecute her appeal were encumbered absent remedy from the Sumter County Clerk of Court with original jurisdiction.

Argument 8: PETITIONER'S RIGHTS IN CIRCUIT COURT WAS
AFFECTED BY RACE OR COLOR

1. On February 5, 2013, the head court bailiff, Mr. Joseph Bradley interrogated the Petitioner's literacy. When the Petitioner asked Mr. Joseph Bradley for his name, Mr. Bradley pulled his name badge on his jacket lapel closer to the Petitioner's face and asked whether she could read. The Petitioner believes her literacy level was questioned on account of her race.
2. S.C. Const. Ann. § 14-1-100 (1962) is titled "Rights in court shall not be affected by race or color" and states:
 - a. "Whenever authority has heretofore been conferred by law upon any free white person or persons to institute any suit or proceedings or to prefer any information or complaint in any matter, civil, penal or criminal, the same rights shall be enjoyed by and the same remedies shall be applicable to all persons whatsoever, regardless of race or color, subject to the same conditions and none other."
3. The Voting Rights Act of 1965 prohibits discrimination in voting practices or procedures because of race and color. The Act prohibited literacy tests and poll taxes which had been used to prevent blacks from voting.
 - a. Although the Petitioner was not at the circuit court to vote, to register to vote, to update her voter registration with the Sumter County Voter Registration office housed in the same building, she was regarded as illiterate on account of her race by the head court bailiff.
 - b. As a constitutional officer, the county sheriff takes an oath of office according to §23-1-20 (S.C. Code of Laws) to, preserve and protect and defend the Constitution of this State and of the United States." Both the State Constitution and the Constitution of the United States: 1) uphold religious freedom and prohibit laws that prohibit the free exercise thereof; 2) guarantee its citizens 2) due process, equal protection of laws.

c. Further, according to SC Code §16-17-560, 1(a) CDR 252 (Criminal Data Report Code), Assault or Intimidation On Account Of Political Opinions Or Exercise Of Civil Rights, which is a Class B Misdemeanor states:

i. "It is unlawful for a person to assault or intimidate a citizen, discharge a citizen from employment or occupation, or eject a citizen from a rented house, land, or other property because of political opinions or the exercise of political rights and privileges guaranteed to every citizen by the Constitution and laws of the United States or by the Constitution and laws of this State. The penalty for such offense is a fine of not more than \$1,000 or imprisonment for not more than two years, or both."

Argument 10: SUPREME COURT EXERCISED PERSONAL JURISDICTION OVER THE PARTIES.

- 1) Although, the Court did not exercise original jurisdiction, citing Rule 245, SCACR in its February 26, 2013 order, it exercised personal jurisdiction over the parties to the case when Petitioner requested a change of venue.
- 2) Similarly, the Petitioner asserts that the Supreme Court exercised personal jurisdiction over the parties to the case when it issued its June 28, 2013 order denying a stay of proceedings.
- 3) The Petitioner argues that the number of contacts with the parties compels the lower court to adequately address her grievances.
- 4) After the June 17, 2013 incident, the lower court provided no explanation for the conduct of the court bailiff assigned to Courtroom #3b. The Circuit Court acted as if nothing occurred and scheduled the matter of *Hunter v. Taylor*, 2012-CP-43-01965, on the September event calendar.
- 5) On June 17, 2013, unable to gain escort back to the building from the City of Sumter Police Department and Sumter Sheriff's Office, the Petitioner was treated for chest pains at the Tuomey Healthcare System and diagnosed with an acute stress reaction.

Argument III: DENIAL OF PETITIONER'S RIGHT TO PROSECUTE

- 1) The right to prosecute and defend oneself in a right preserved in the South Carolina State Constitution, S.C. Code Ann. § 40-5-80.
- 2) The lower court repeatedly denied the Petitioner's right of access to courtroom thereby denying her right to prosecute her matter on her own behalf.
- 3) The lower court failed to demonstrate it how the Petitioner's hijab created a compelling burden upon the courthouse security.
- 4) On each occasion, the Petitioner entered the Sumter County courthouse buildings, she successfully complied with and met the requirements of the security screening procedures.
- 5) The Petitioner is aggrieved because there is a lack of fair play. Unlike the lower court, the Petitioner did not abridge the Court's right to due process of the Lower Court when she sought to resolve her grievance before the South Carolina Human Affairs Commission.

Argument 12: CIRCUIT COURT BREACH OF RESPONSIBILITIES TO
PERFORM SERVICES

- 1) The Sumter County Clerk of Court is in fundamental breach of his responsibilities to perform the services the Petitioner paid for.
 - a. The Petitioner asserts there is an express contract between her and the Circuit Court as a receipt was issued for \$150 in acceptance of her filing notice of appeal from the Summary Court; 2) a receipt was issued for \$25 for her filing a post-trial Motion for a New Trial/Motion to Amend or Alter Judgment; and 3) a receipt was issued for \$25 for her to file a Motion to Withdraw when the Court failed to perform its services.
- 2) Similarly, the Third Circuit Administrative Judge failed to exercise his discretion to remove the court bailiffs or remedy past injuries.
 - a. According to South Carolina Code of Laws, Title 14, Courts, Chapter 15, Court Stenographers and Bailiffs, Article 3, Bailiffs (SC Code §14-15-210) that bailiffs are appointed by the Sumter County Sheriff's Department and may be removed by the circuit judge within his discretion.
 - b. According to South Carolina Code of Laws, Title 14, Courts, Chapter 9, County Courts (SC Code §14-9-100) that the presiding judge of the county appoints a sufficient number of bailiffs to attend upon the court.
- 3) The lower Court's indifference to work towards a final resolution has denied the Petitioner's right to prosecute her matter on appeal and lessen the Court's ability to address a serious complaint of harassment in a timely fashion. The Petitioner paid \$200

in filing files and other legal costs but never had her appeal decided in chamber or in open court.

WHEREFORE, I, Regina M. Hunter, pray for an order reinstating the Notice of Appeal. *Indeed; Allah is All-Hearing, All-Knowing, All-Seeing, Full of Strength, Able to Enforce His Will.*

March 18, 2014;

17 Jumada Al-Awwal, 1435 A.H.



Regina M. Hunter

3390 Highway 261 North

Rembert, South Carolina 29128-

8540

(803) 883-0600

reginahunter@ftc-i.net

Appellant, Pro-Se

APPENDIX A

The Supreme Court of South Carolina

Regina M. Hunter, Petitioner,

v.

Sammie Taylor, Respondent.

Appellate Case No. 2013-000374

ORDER

This case is currently pending before the circuit court regarding an appeal from magistrates court. The public case index indicates that it is scheduled to be heard today. *Hunter v. Taylor*, 2012-CP-43-01965.

In correspondence dated February 19, 2013, petitioner asks this Court to grant a change of venue. The request is denied since this relief should be sought in the circuit court rather than in this Court. Rule 245 of the South Carolina Appellate Court Rules (SCACR).

Petitioner raises concerns about her treatment by personnel at the county courthouse. These concerns should first be raised to the county clerk of court, and if necessary, then to the Chief Judge for Administrative Purposes in the Third Judicial Circuit. This Court is confident that these officials will ensure that petitioner's right of access to the court is not unnecessarily restricted and that her religious beliefs are adequately accommodated.



A.C.J.

FOR THE COURT

Columbia, South Carolina
February 26, 2013

cc: Ms. Regina M. Hunter
Dwight Christopher Moore, Esquire
The Honorable George C. James, Jr. (with copy of correspondence)
The Honorable James C. Campbell (with copy of correspondence)

APPENDIX B



SUMTER COUNTY CLERK OF COURT

JAMES C. CAMPBELL

Sumter County Courthouse ■ 141 North Main Street ■ Sumter, South Carolina, 29150

Clerk's Office
(803) 436-2227
Fax (803) 436-2223

Family Court
(803) 436-2366
Fax (803) 436-2396

Common Pleas
(803) 436-2228
(803) 436-2231

Jury Information
(803) 436-2233

Fines & Restitution
(803) 436-2230

General Sessions
(803) 436-2264
(803) 436-2265

March 6, 2013

Ms. Regina Hunter
3390 Highway 261 North
Rembert, S.C. 29128

Dear Ms. Hunter:

I am committed to making you and everyone feel as safe as possible while conducting business in the Sumter County Courthouse. We have security at the main entrances and exits of the building. They are here to ensure everyone's safety and security that access this building.

If you have any other questions or concerns, please do not hesitate to bring them to my attention.

Sincerely,

James C. Campbell
Clerk of Court
Sumter County

APPENDIX C



State of South Carolina
Third Judicial Circuit

GEORGE C. JAMES, JR.
CIRCUIT COURT JUDGE

141 NORTH MAIN STREET, SUITE 303
POST OFFICE BOX 1716
SUMTER, SOUTH CAROLINA 29151-1716
TELEPHONE: (803) 436-2150
FAX: (803) 436-2403
E-MAIL: gjamesj@sccourts.org

April 29, 2013

Ms. Regina M. Hunter,
3390 Highway 26 North,
Rembert, South Carolina 29128

Dear Ms. Hunter:

I received your April 12 letter by fax on April 15 and by regular mail later that same week.

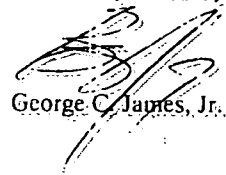
I have no direct supervisory authority over Mr. Bradley, but I have spoken to Clerk of Court James C. Campbell. He advises that he has discussed your concerns with Mr. Bradley. I have always considered Mr. Bradley to be extremely professional and conscientious in the exercise of his duties. He and the other bailiffs encounter a vast number of people in the course of their official duties, and they may sometimes seem somewhat gruff and pointed to jurors, litigants, and witnesses. I am confident Mr. Bradley had no discriminatory intentions toward you.

I cannot address any contentions you state about violations of the criminal law, as I am not permitted to engage in that discussion. Likewise, I will not comment on the substance of Judge Young's ruling, as I have no authority over him at all. Likewise, I cannot comment on any issues you have pending in the Court of Common Pleas.

Page Two
April 29, 2013

In my view, any concerns you have about (1) your right of access to the court and (2) the accommodation of your religious beliefs have been addressed. I believe you will encounter no problems in these areas.

Yours very sincerely,



George C. James, Jr.

GCJr:djf

CC: Honorable W. Jeffrey Young
Honorable James C. Campbell - Clerk of Court

APPENDIX D)



SUMTER COUNTY SHERIFF'S OFFICE
ANTHONY DENNIS, SHERIFF

July 2, 2013

Mrs. Regina Hunter,
3390 Highway 261 North,
Rembert, SC 29128

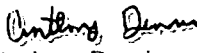
Dear Mrs. Hunter:

Thank you for the expressing your concerns about what you perceived to be improper treatment by a person you apparently believed was one of my deputies. However, after reviewing your writings and discussing the matter with you in person, it appears that the individual against whom you have requested that I take "corrective and conciliatory" action is a bailiff, but is not one of my deputies. (although we do have a deputy with the same last name). The bailiffs do not report to me, but rather to the Clerk of Court; consequently I can take no disciplinary action against the individual you name. Neither does it appear to me that there is probable cause that any criminal offense has been committed.

It appears from our discussion and from the various documents you have submitted for my review that other agencies have attempted to assure you that they respect your access to the courts equally as any other individual. Likewise, my office fully respects your access to the courts as we do that of any other individual without regard to race or religious affiliation. Our mission statement excludes no one as we strive to protect and serve and improve the quality of life for all citizens of Sumter County.

As always, in the event you have questions or concerns about law enforcement matters, I encourage you to contact my office.

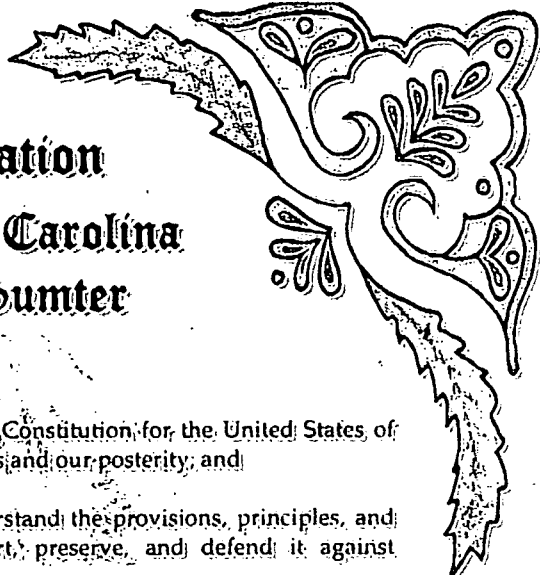
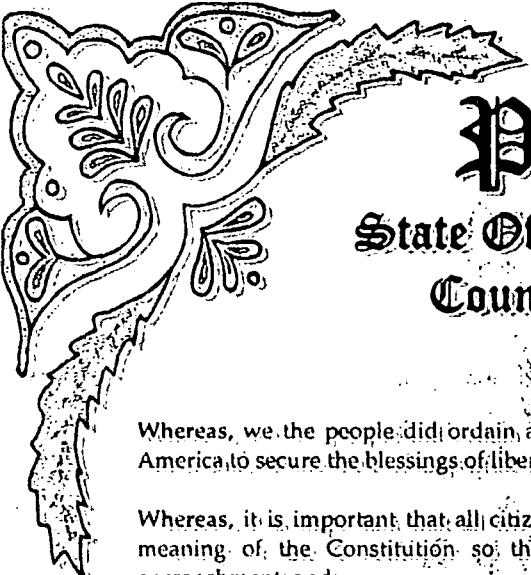
Sincerely,


Anthony Dennis,
Sheriff

Cc: The Honorable James C. Campbell

Sumter County Sheriff's Office, 1281 North Main Street Sumter, South Carolina
29153 Telephone (803)436-2700 Fax: (803)436-2783 Website: www.sumtersheriff.org

APPENDIX E



Proclamation
State Of South Carolina
County Of Sumter

Whereas, we the people did ordain and establish a Constitution for the United States of America to secure the blessings of liberty for ourselves and our posterity; and

Whereas, it is important that all citizens fully understand the provisions, principles, and meaning of the Constitution so they can support, preserve, and defend it against encroachment; and

Whereas, the President and the Congress of the United States have designated September 17th as Citizenship Day and the week of September 16-22, 2012, as Constitution Week; and

Whereas, the people of the County of Sumter do enjoy the blessings of liberty, the guarantees of the Bill of Rights, equal protection of the law under the Constitution, and the freedoms derived from it;

NOW, THEREFORE, I, Eugene R. Baten, Chairman of Sumter County Council, do hereby proclaim September 17th as Citizenship Day and the week of September 16th through September 22nd as Constitution Week, and invite every citizen and institution to join in this national commemoration.

IN WITNESS WHEREOF, I have hereunto set the Seal of Sumter County to be affixed this 17th Day of September 2012.

SUMTER COUNTY COUNCIL

Eugene R. Baten
Its Chairman: Eugene R. Baten

Mary W. Blanding
Attest: Mary W. Blanding
Clerk to Council

Witnessed this 17th Day of September 2012

APPENDIX F



State of South Carolina
Office of the Governor

NIKKI R. HALEY,
GOVERNOR

OFFICE OF EXECUTIVE
POLICY AND PROGRAMS

June 26, 2013

Ms. Regina Hunter,
3390 Highway 261, North,
Rembert, SC 29128;

Dear Ms. Hunter,

The Office of the Crime Victims' Ombudsman has received and reviewed your complaint regarding incidents at the Sumter County Courthouse. However, the concerns addressed in your complaint are outside the statutory jurisdiction of our office and we will not be able to assist you.

I believe many of your concerns regarding the Sumter County court and court personnel would be better addressed by Court Administration in the SC Judicial Department; therefore, I am going to forward a copy of your complaint to their office.

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie Depra Curtis", written over a circular stamp or seal.

Debbie Depra Curtis
Crime Victims' Ombudsman

cc: SC Court Administration;

OFFICE OF THE CRIME VICTIMS' OMBUDSMAN
1205 PENDLETON STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-0347 | FAX: (803) 734-1428
EMAIL: CVO@OEPF.SC.GOV
WEBSITE: WWW.OEPF.SC.GOV/CVO

APPENDIX G

Page 1 of 2

Career Action Plan Group

From: Grant, Lena [LGrant@oepp.sc.gov]
Sent: Monday, February 24, 2014, 11:05 AM
To: reginahunter@fc.i.net
Subject: Corrected Copy - RE: Ombudsman's, June 16, 2013; Reply to CVO Complaint Form

Mrs. Hunter,

I'm responding to your request to Veronica Swain Kunz.
This is to confirm that on June 26, 2013, your information was sent to the South Carolina Judicial Department.
Today, Monday, February 24, 2014, I spoke with Mrs. Rosalyn W. Frierson, Director of SC Court Administration,
and it was confirmed that your information was received in her office on June 27, 2013.

Thank you.

Lena L. Grant

Program Assistant

Office of Crime Victims' Ombudsman

1205 Pendleton Street

Columbia, South Carolina, 29201

Direct: (803) 734-0357

3/18/2014

APPENDIX H



STATE OF SOUTH CAROLINA



HUMAN AFFAIRS COMMISSION

1026 Sumter Street, Suite 101, Post Office Box 4490,
Columbia, South Carolina, 29240,
(803) 737-7800, FAX: (803) 253-4191

Raymond Buxton, Jr.
Commissioner

To file complaints call (803) 737-7800
or 1-800-634-6725 (in South Carolina)

NOTICE OF RIGHT TO SUE
(Dismissal)

TO: Ms. Regina Hunter,
3390 Highway 261, North,
Rembert, SC, 29128

CHARGE #: 3-7-24-13-2

SHAC REPRESENTATIVE: Commissioner Raymond Buxton,
TELEPHONE #: (803) 737-7800

This is your NOTICE OF RIGHT TO SUE. It is issued because of the reasons stated below:

- The Commission is issuing a Notice of Right to Sue. This ends the Commission's involvement in this matter.

The issuance of this NOTICE OF RIGHT TO SUE terminates the Commission's processing of your charge. Further, you have the right to sue the respondent(s) named in your charge in Circuit Court.

You may contact the SHAC representative named above if you have any questions about your legal rights including advice on which Circuit Court has jurisdiction to hear your case. An information copy of this NOTICE OF RIGHT TO SUE has been sent to the respondent(s) shown below:

ON BEHALF OF THE COMMISSION:

Commissioner

2-21-14
Date:

cc: Sumter County Clerk of Court



STATE OF SOUTH CAROLINA



HUMAN AFFAIRS COMMISSION

2611 Forest Drive, Suite 200, Post Office Box 4490,
Columbia, South Carolina, 29240
(803) 737-7800 FAX: (803) 253-4125

Raymond Buxton, II
Commissioner

Telephone Device for the Deaf:
(TDD) (803) 253-4125
To file complaints dial (803) 737-7800
or 1-800-521-0725 (In-State Only)

February 21, 2014

Ms. Regina Hunter
3390 Highway 261, North
Rembert, SC 29128

Re: SHAC Complaint 3-7-24-13-2
Regina Hunter v. Sumter County Clerk of Court

Dear Ms. Hunter:

The South Carolina Human Affairs Commission, Division of Community Relations, has closed the subject complaint based upon:

- unable to resolve.
- being withdrawn by the Complainant.
- Complainant's failure to cooperate.
- Respondent's failure to cooperate.
- this case being referred to another agency.
- negotiations between you and Respondent.
- notice of right to sue issued.

Sincerely,

Raymond Buxton, II
Commissioner

cc: Sumter County Clerk of Court

APPENDIX I



U.S. Department of Justice

Office of Justice Programs

Office for Civil Rights

October 24, 2013

Washington, D.C. 20531

Regina M. Hunter,
3390 Highway 261, North,
Rembert, SC 29128

Dear Ms. Hunter:

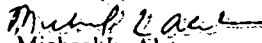
Thank you for your letter to Assistant Attorney General Karol Mason of the Office of Justice Programs (OJP), U.S. Department of Justice (DOJ), dated September 16, 2013. In your letter, you request that the OJP set aside a portion of the Edward Byrne Memorial Justice Assistance Grant (JAG) Program funding awarded to the Sumter County Sheriff's Office (SCSO) for the appointment of a special investigator to evaluate the SCSO's compliance with civil rights statutes and regulations. Based on the information contained in your letter, you appear to allege that a deputy with the SCSO discriminated against you based on your religious beliefs when the deputy denied you access to the Sumter County courthouse for wearing a hijab.

The Office for Civil Rights (OCR) at OJP has the administrative responsibility for enforcing federal civil rights laws that prohibit agencies receiving DOJ financial assistance from discriminating in the provision of services on the basis of race, color, national origin, religion, disability, sex, or age. While under the terms and conditions of the grant award the OJP cannot set aside a portion of the SCSO's JAG award for a special investigator, if you believe that the SCSO has discriminated against you, you may file an administrative complaint with the OCR and we will review your complaint pursuant to our enforcement authority.

To assist us in reviewing your allegations, please complete, sign, and date the two enclosed forms: (1) the Complaint Verification Form and (2) the Identity Release Statement. Both forms are also available online at <http://www.ojp.usdoj.gov/about/ocr/complaint.htm>. Please send the completed documents to the following address: Attorney Shelley Langguth, Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice, 810 7th Street, NW, Washington, DC 20531. If you choose to return the complaint documents by a private overnight carrier, please use the zip code 20001.

We will notify you in writing when we receive the complaint forms. If you have any questions, please contact Ms. Langguth at (202) 305-2353.

Sincerely,


Michael E. Alston,
Director

Enclosures

APPENDIX J

Court News

County Court Security Committees

The Court Security Task Force, under the leadership of Chief Justice Jean Toal and Chief Robert Stewart of SLED, has recommended establishment of county court security committees to address courthouse security concerns. The attached order from the Chief Justice establishes local court security committees chaired by a circuit or family court judge along with the county sheriff as vice-chair. Each county committee shall include at a minimum the County Clerk of Court, Chief Magistrate, Solicitor, Public Defender, a Chief of Police and Emergency Preparedness Manager.

2005-08-31-01

The Supreme Court of South Carolina

Re: County Court Security Committees

ORDER

Pursuant to the provisions of S. C. CONST. Art. V, § 4,

IT IS ORDERED THAT each county shall establish a Court Security Committee to address courthouse security concerns. Each county committee will be chaired by a Circuit or Family Court Judge as designated below and co-chaired by the County Sheriff. The committee members shall include at a minimum the County Clerk of Court, Chief Magistrate, a Chief of Police, Solicitor, Public Defender, and Emergency Preparedness Manager.

Each Court Security Committee shall be responsible for performing a security audit of each building where court is held. A comprehensive checklist will be provided to each committee to perform the assessment. The committee will also be responsible for developing a security plan for every facility where court is held.

The following judges shall chair the respective county security committee:

The First Judicial Circuit:

- Calhoun The Hon. James C. Williams, Jr.
- Dorchester The Hon. Diane Schafer Goodstein
- Orangeburg The Hon. Anne Gue Jones

The Second Judicial Circuit:

Aiken The Hon. Doyet A. Early, III
 Bamberg The Hon. Doyet A. Early, III
 Barnwell The Hon. Dale Moore Gable

The Third Judicial Circuit:

Clarendon The Hon. Thomas W. Cooper, Jr.
 Lee The Hon. George M. McFaddin, Jr.
 Sumter The Hon. William Jeffrey Young
 Williamsburg The Hon. Clifton Newman

The Fourth Judicial Circuit:

Chesterfield The Hon. Roger E. Henderson
 Darlington The Hon. J. Michael Baxley
 Dillon The Hon. James E. Lockemy
 Marlboro The Hon. Edward B. Cottingham

The Fifth Judicial Circuit:

Kershaw The Hon. J. Ernest Kinard, Jr.
 Richland The Hon. Reginald J. Lloyd

The Sixth Judicial Circuit:

Chester The Hon. Brian M. Gibbons
 Fairfield The Hon. Kenneth G. Goode
 Lancaster The Hon. Brooks P. Goldsmith

The Seventh Judicial Circuit:

Cherokee The Hon. Wesley L. Brown
 Spartanburg The Hon. J. Derham Cole

The Eighth Judicial Circuit:

Abbeville The Hon. Wyatt T. Saunders, Jr.
 Greenwood The Hon. Billy A. Tunstall, Jr.
 Laurens The Hon. James W. Johnson, Jr.
 Newberry The Hon. John M. Rucker

The Ninth Judicial Circuit:

Berkeley The Hon. R. Markely Dennis, Jr.
 Charleston The Hon. Roger M. Young

The Tenth Judicial Circuit:

Anderson, The Hon. J. C. Nicholson, Jr.
Oconee, The Hon. Alexander S. Macaulay

The Eleventh Judicial Circuit:

Edgefield, The Hon. William P. Keesley
Lexington, The Hon. Marc H. Westbrook
McCormick, The Hon. William P. Keesley
Saluda, The Hon. C. David, Jr. Sawyer

The Twelfth Judicial Circuit:

Florence, The Hon. Arthur E. Morehead, III
Marion, The Hon. Mary E. Buchan

The Thirteenth Judicial Circuit:

Greenville, The Hon. Edward W. Miller
Pickens, The Hon. G. Edward Welmaker

The Fourteenth Judicial Circuit:

Allendale, The Hon. Perry M. Buckner
Beaufort, The Hon. Jane D. Fender
Colleton, The Hon. Perry M. Buckner
Hampton, The Hon. Gerald C. Smoak, Jr.
Jasper, The Hon. Robert S. Armstrong

The Fifteenth Judicial Circuit:

Georgetown, The Hon. Paula H. Thomas
Horry, The Hon. John Breeden, Jr.

The Sixteenth Judicial Circuit:

Union, The Hon. Robert E. Guess
York, The Hon. John C. Hayes, III

The State Court Administrator in coordination with the State Law Enforcement Division shall provide additional guidance to facilitate the process.

AND IT IS SO ORDERED.

s/Jean Hofer Toal
Chief Justice

Columbia, S.C.
August 31, 2005

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

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Case No. 2012-CP-430-1965

Regina M. Hunter,

Appellant.

v.

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 Petition for Reinstatement on Sammie Taylor by depositing a copy of it in the United States Mail, postage prepaid, on March 18, 2013, addressed to his attorney of record, Dwight C. Moore, Moore Law Firm, 26 North Main Street, P.O. Box 11229, Sumter, South Carolina 29151-1229.

March 18, 2013;
17 Jumada Al-Awal, 1435A.H.



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

RECEIVED
MAR 18 2014
SC Court of Appeals

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

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Case No. 2012-CP-430-1965

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 Petition for Reinstatement on Circuit Court by depositing a copy of it in the United States Mail, postage prepaid, on March 18, 2014, addressed to the Clerk of Court, James C. Campbell, 215 North Harvin Street, Sumter, South Carolina 29150.

March 18, 2013;
17, Jumada Al-Awwal 1435 A.H.



Regina M. Hunter
3390 Highway 26, North
Rembert, South Carolina 29128-8540
(803) 883-0600
Appellant

RECEIVED

MAR 18 2014

SC Court of Appeals

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

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Case No. 2012-CP-430-1965

Regina M. Hunter,

Appellant.

v.

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 Petition for Reinstatement on Sumter County South Carolina Government by depositing a copy of it in the United States Mail, postage prepaid, on March 18, 2013, addressed to its attorney of record, Johnathan W. Bryan, 13 East Canal Street, Administration Building, Sumter Sumter, South Carolina 29150-4925.

March 18, 2013
17 Jumada Al-Awal, 1435 A.H.



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

RECEIVED

MAR 18 2014

SC Court of Appeals

Appendix D

Petition for Writ of Certiorari

Appellate Case No. 2014-001508

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

Regina M. Hunter
3390 Highway 261 North
Rembert, SC 29128-8540
(803) 883-0600
reginahunter@ftc-i.net
Appellant, Pro-Se

Counsel of Record, Attorney for Respondent
Dwight C. Moore, Esquire
Moore Law Firm
26 North Main Street
P.O. Box 1229
Sumter, SC 29151-1229
(803) 778-6520

South Carolina Government Sumter County
Johnathan W. Bryan, County Attorney
Administration Building
13 East Canal Street
Sumter, SC 29150-4925
(803) 774-3877

22792
RECEIVED
JUL 09 2014

SC Court of Appeals

TABLE OF CONTENTS

Table of Authorities	2
Motion to Vacate.....	3
Argument 01: Constitutional Right to Public Access to Courts	4
Argument 02: Constitutional Right to Religious Freedom	7
Argument 03: Due Process, Equal Protection of the Laws, Uniform Jurisdiction	8
Argument 04: Unreasonable Delays. Noncompliance to Court Rules.....	10
Argument 05: SCACR Rules Language Distinguishes between Motion for Reinstatement and Petition for Rehearing	12
Argument 06: Suggestion of Rehearing En Banc Not Afforded	14
Argument 07: Right to Appeal Not Afforded	15
Argument 08: Timing of Interlocutory Order was Critical.....	16
Certificates of Service.....	17-19

TABLE OF AUTHORITIES

Cases

<i>Wisconsin v. Yoder</i> , 406 U.S. 205 (1972)	7
<i>Sherbert v. Verner</i> , 374 U.S. 398 (1963)	7
<i>Platsky v. C.I.A.</i> 953 F.2d 25 (1991).....	15
<i>Hunter v. Taylor</i> , 2012-CP-43-01965	

Statutes

U.S. Const., Amend. V.....	9
U.S. Const., Amend. XIV, §1	8
S.C. Human Affairs Law § 1-13-20	4
S.C. Code of Law § 45-9-30 Equal Enjoyment & Privileges to Public Accommodation.....	4
S.C. Code of Law § 14-3-330, Appellate Jurisdiction of the Supreme Court	6
S.C. Code of Law § 1-32-30 (1) Religious Freedom Act	7
S.C. Code of Law § 1-32-40 Religious Freedom Act	8

Other Authorities

S.C. Const. Art. 1, § 2	7
S.C. Const. Art. 1, § 3	9
S.C. Const. Art. 1, § 9	4
S.C. Const. Art. V, § 1	9
S.C. Const. Art. V, § 4A	7
S.C. Const. Art. V, § 5	10
S.C. Const. Art. V, § 20	15
Clerk of Court Manual § 1.16 Court Security.....	5
Clerk of Court Manual § 6.3 Case Processing, § 6.4.4 Trial Roster	11

Court Rules

Rule 18 (b) SCMCR.....	10
Rule 18 (c) SCMCR.....	10
Rule 77a SCRCF	11
Rule 77d SCRCF	11
Rule 72 SCRCF	9
Rule 201 SCACR.....	9
Rule 203 (b) (1) SCACR.....	14
Rule 219 (b) SCACR	14
Rule 221 SCACR.....	13
Rule 240 (a) SCACR.....	12
Rule 260 SCACR.....	13
Rule 262 SCACR.....	13

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 Delays ¹	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

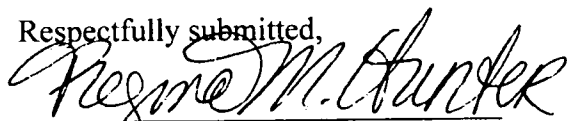
- a. **S.C. Const. Art. V, § 20** states “Each of the Justices of the Supreme Court and judges of the Court of Appeals and Circuit Court and of all other courts of record shall have the same power at chambers to issue writs of habeas corpus, mandamus, quo warranto, certiorari, prohibition, and interlocutory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

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 7/9/2014
3390 Highway 261 North
Rembert, SC 29128-8540
(803) 883-0600
reginahunter@ftc-i.net
Appellant, Pro-Se

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

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Appellate Case No. 2013-002794

Regina M. Hunter,

Appellant.

v.

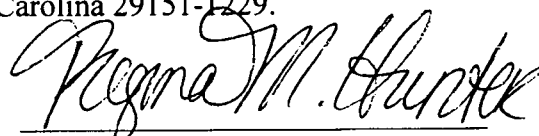
Sammie Taylor,

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
7/9/2014

RECEIVED
JUL 09 2014
SC Court of Appeals

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

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Appellate Case No. 2013-002794

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
Rembert, SC 29128-8540
(803) 883-0600
Appellant
7/9/2014

RECEIVED
JUL 09 2014
SC Court of Appeals

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

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Appellate Case No. 2013-002794

Regina M. Hunter,

Appellant.

v.

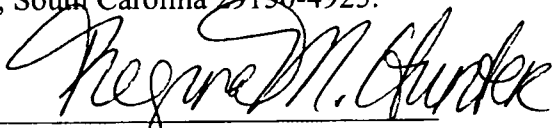
Sammie Taylor,

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
3390 Highway 261 North
Rembert, South Carolina 29128-8540
(803) 883-0600
Appellant

7/9/2014

RECEIVED
JUL 09 2014
SC Court of Appeals