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AUG 21 2014

S.C. Supreme Court

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Unpublished Opinion No. 2014-UP-192 (S.C. Ct. App. filed May 7, 2014)

Lawrence Terry,

Petitioner,

v.

Allen University,

Respondent.

REPLY TO RESPONDENT'S RETURN FOR WRIT OF CERTIORARI

Lawrence Terry
Post Office Box 24138
Columbia, South Carolina 29224
(803) 414-0760
Petitioner Pro Se

Other Counsel of Record:
Debbie Whittle Durban
Post Office Box 11070
Columbia, South Carolina 29211
(803) 255-9465
Attorney for Respondent

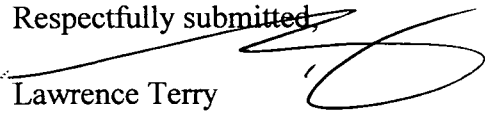
In reply to the Respondent's Return the Petitioner restates the following material facts:

1. Allen University filed a Motion To Dismiss the Original Complaint.
2. The Amended Complaint satisfied all "defects" of the Original Complaint.
3. The Amended Complaint contained multiple substantive changes starting on page one.
4. Allen University was required to respond or request for an extension of time, if one was needed.
5. Allen University did not respond to the Amended Complaint as required by SCRCP.
6. Allen University was in Default.
7. Allen University's Default was shown in an Affidavit of Default filed six days before the case Dismissal.
8. Allen University failed to respond to the Requests For Admissions.
9. All Requests were deemed admitted.
10. The Appeals Court's Unpublished Opinion relied on alleged Orders/Rulings not included in the Record.
11. The Record does not contain an Order/Ruling "Granting Allen University's Motion To Dismiss".
12. No such ruling was made by the Circuit Court.
13. The record does not contain an Order/Ruling "Denying Terry's Motion For Default Judgment".
14. No such ruling was made by the Circuit Court.
15. Once the Appeals Court "combined" the Petitioner's arguments in their Unpublished Opinion the original issues were misconstrued and misapprehended.

Lawrence Terry filed an Amended Complaint with the sole purpose of curing all of the "defects" and issues that Allen University stated in their Motion To Dismiss. Allen University was required to respond but Allen failed to respond to the Amended Complaint as they also failed to respond to the Requests For Admissions. The abrupt Order of Dismissal did specify or give any reasoning for its ruling. Lawrence Terry properly filed an affidavit of default before the Order of Dismissal. For the reasons stated, petitioner asks the Court to grant the petition for a writ of certiorari.

August 21, 2014

Respectfully submitted,


Lawrence Terry
Post Office Box 24138
Columbia, South Carolina 29224
Petitioner, Pro Se

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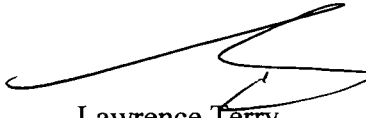
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PROOF OF SERVICE

I certify that I have served the REPLY TO RESPONDENT'S RETURN FOR WRIT OF CERTIORARI on Allen University by hand delivering copies on August 21, 2014 to his attorney of record, Debbie W. Durban, Post Office Box 11070 Columbia, South Carolina 29211.

August 21, 2014



Lawrence Terry
Post Office Box 24138
Columbia, SC 29224
(803) 414-0760
Petitioner, Pro Se