

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM ANDERSON COUNTY
Court Of Common Pleas, 04th Judicial Circuit

J.C. Nicholson, Circuit Court Judge

Case No: 2013-00879

State Of South Carolina.....Respondent,

v.

William Deans.....Appellant.

Appellant Reply To Respondent's, Aug. 20, 2014, "Return To Appellant's
Second Application For An Order Lifting Supersedes(sic) Aug. 20, 2014".

William Deans
Bldg. 3, 3d floor
7901 Farrow Rd.
Columbia, C 29203
803-889-1195
Appellant, pro-se

Other:

South Carolina Attorney Generals
Alan Wilson
/ Assist AG Mrs. Shupe ,
PO Box 11549
Columbia, SC 29211

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SC Court of Appeals

Reply:

Appellant received Respondent's self styled paper entitled "Return To Appellant's Second Application For An Order Lifting Supersedes(sic), (Respondants Return) with Respondent continued ranting for what appears to be a personal vendetta after Appellant caught and is pursuing legal action against the States representatives malay of lying to the court, with holding exculpatory evidence, facilitation of false records to obtain commitment of appellant.

Appellant like any other civilly committed person is denied by the State of SC access to a legal law library, leaving Appellant not knowing exactly how to interpret a number of issues and rules on appeal, especially the mechanics of how to lift Supersedes,

Appellant filed a second application seeking to lift Supersedes, after being denied four times, being twice in the lower court and twice in the SC Court Of Appeals, and being denied on all counts which in turn has denied Appellant for over a year from proceeding in SVP treatment and pursuing violations against the Respondants of lower court orders,

1) such as the SC Attorney Generals Office causing court ordered tape recordings of the 2012, SCC Ann. §§ 44-48-110, annual review examination to be confiscated prior to the 2013/2013 SCC Ann. 44-48-110 annual review hearing (subject) of this appeal .

2) and the violation of a court ordered injunction barring the referencing / speaking of out of state dismissed charges.

Appellant's present Application to Lift Supersedes, ask for interpretation being.

Questioning:

a) did the Supersedes that's in effect, bar the State from pursuing a present 2013/2014 §§44-48-110 annual review and examination

b) If it did, Appellant ask the court to put the 2013/2014 proceedings into abeyance,

c) or, if the Supersedes did not effect the 2013/2014 proceedings, please simply say so.

Respondent further rants on / see Return, [page 1 The Department also complied with the injunction including in the 2103 Order by not asking Appellant any questions regarding out-of-state allegations involving his step-daughter”.

And see, Respondent’s Return, page 2, Respondant rant on saying “”Appellant's request makes it abundantly clear he remains focused on the same legal issues he raised at every stage of the SVP proceedings””.

Reply:

Appellant has every right to keep raising the Respondants many documented violations made against him, especially to obtain civil commitment by having Appellant appointed defense expert (who admitted) as ordered by the Attorney Generals Office to falsify [her] examination report and then the Respondant turns right around and claims the report substantiates their examiners report. The with holding of exculpatory evidence for the last ten years; And using a discredited witness from an out of state dismissed case, here in SC, in order to obtain civil commitment.

And, presently the SVP Treatment Program for the last year, has with held meaningful SVP treatment, not due to Appellants fault as claimed by the ranting Respondent but due to as testified by the Respondents agent Attorney Carter that the case is MOOT with the injunction in place / stopping the Respondent from further interrogating and requiring Appellant to admit guilt to the out of state dismissed charges.

see Appellants Amended ROA Designation of Matter To Be Included In The Record page 12-14, section #2, Notice of And Motion For Relief From And Stay of Order' dated March 7, 2013, signed SCDMH Attorney Kimble Carter , see page 13 section Rule 62(b) Stay of Proceedings last 2 lines,

"finally although the form of order is complete of repetition in this and other proceedings purportedly arising under the SVP Act, this particular case may be arguably be rendered moot if not immediately stayed."

Appellant right to continue raising these issues stems from the fact the circuit court nor has this Court ever directly addressed these issue nor mad ea ruling on, which according to statutory procedure and case precedence are issues not barred by res-judicator / nor by preclusion.

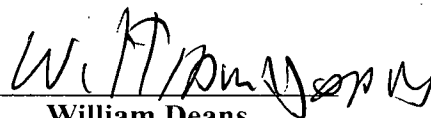
The fact is the Respondant has never denied lying, or with holding exculpatory evidence, or not violating court orders or the injunction / it is the Respondant hate's being caught and Appellant making it be known to the courts

For the foregoing reasons this Court should strike the Respondants Return To Appellant's Second Application For An Order Lifting Supersedes(sic),

And issue a decision lifting Supersedes to address present and past violation not at isse on this appeal.

Respectfully submitted by

August 26^{WD}, 2014



William Deans
Bldg. 3, 3d floor
7901 Farrow Rd.
Columbia, C 29203

Aug. 26, 2013

Honorable Jenny Kitching
Clerk, South Carolina Court Of Appeals
PO Box 1629
Columbia, SC 29211

Ref: In The Matter Of Care And Treatment Of
William Deans, Appellant Case No: 2013-000879

Dear, Mrs .Kitching,

Please clock stamp the inclosed for filing; Appellant Reply To Respondent's, Aug. 20, 2014,
"Return To Appellant's Second Application For An Order Lifting Supersedes(sic).

And Return Appellant copy in the provided pre- addressed envelope.

Respectfully submitted by,

A handwritten signature in black ink, appearing to read "W Deans". The signature is written in a cursive, somewhat stylized font.

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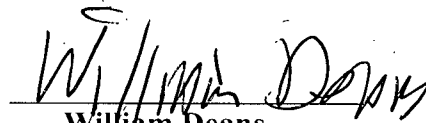
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William Deans.....Appellant.

PROOF OF SERVICE

Appellant Reply To Respondent's "Appellant Reply To Respondent's, Aug. 20, 2014, "Return To Appellant's Second Application For An Order Lifting Supersedes(sic)", on Alan Wilson / Assist AG Mrs. Shupe, PO Box 11549, Columbia, SC 29211, by depositing a copy thereof into the United States Mail, with postage prepaid by Appellant, as addressed on Aug. 26, 2014

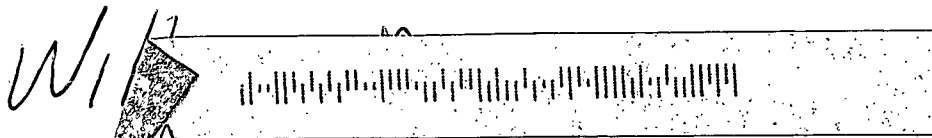
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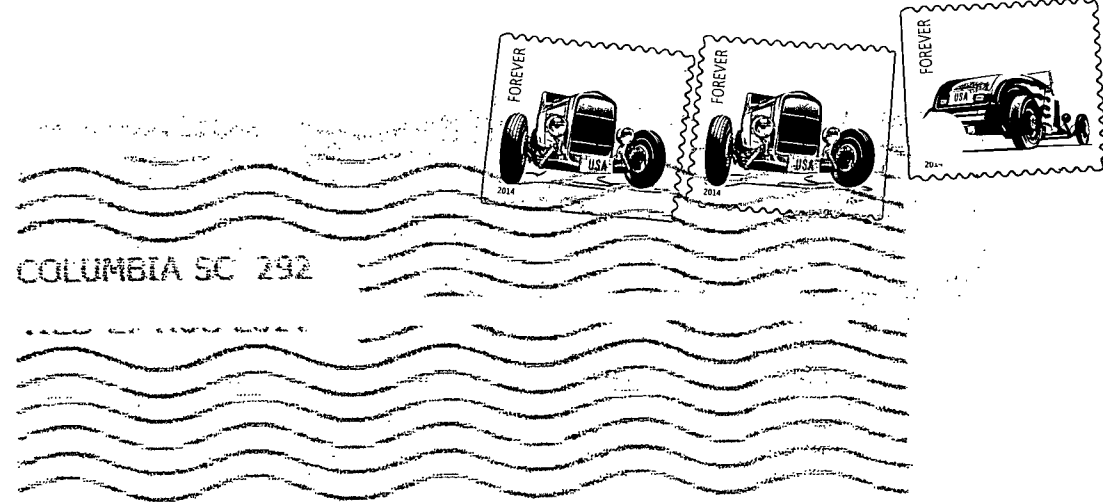
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