

No. _____

THE STATE OF SOUTH CAROLINA

In The SUPREME COURT

PETITION ON A WRIT OF CERTIORARI TO THE COURT OF APPEALS

APPELLATE Case No. 2013-002785

RECEIVED

OCT 31 2014

Norman Robert Knight,

Petitioners,

S.C. Supreme Court

v.

Companion Property and Casualty
Insurance Company of South Carolina;
Robertson Hollingsworth & Flynn Law Firm with;
Paul R. Ryan, as an Individual & a Partner:

Respondent(s)

Questions Submitted for Review SCAC RULE 242(d)(2)

- I. DID THE COURT BELOW ERROR BY ADMITTING AND CONSIDERING RESPONDENT'S EVIDENCE OF A USDC ORDER (YEAR 2012) THAT THESE RESPONDENTS OBTAINED IN BLATANT VIOLATIONS OF SOUTH CAROLINA LAW, COURT RULES AND TWO (2) SOUTH CAROLINA SUPREME COURT OPINIONS RESULTING IN A DEPRIVATION OF AND A DENIAL OF THIS PETITIONER'S FOURTEENTH AMENDMENT - EQUAL PROTECTIONS AND A DEPRIVATION OF AND A DENIAL OF DUE PROCESS OF THE LAWS?
- II. DID THE COURT ERROR AND VIOLATE BY OVERREACHING THE SOUTH CAROLINA CONSTITUTION'S **SEPARATION OF POWERS CLAUSE, ARTICLE 1 SECTION 8**, FOR THE SOUTH CAROLINA STATE GOVERNMENT'S THREE (3) SEPARATE BRANCHES THAT EACH BRANCH ARE TREATING THIS PETITIONER (Mr. Knight) SIMULTANEOUSLY ^{NOT} EQUAL AS BOTH A NATURAL PERSON AND WRONGFULLY TREATING THE PETITIONER AS A FOR-PROFIT DOMESTIC

Clearly, these Respondents can not refute the facts, they merely hide behind a defense that the Petitioner is not an attorney and so he cannot tell on them to the Court. This WRIT begs to differ.

Arguments for Review - SCAC RULE 242(d)(4)

I. DID THE COURT BELOW ERROR BY ADMITTING AND CONSIDERING RESPONDENT'S EVIDENCE OF A USDC ORDER (YEAR 2012) THAT THESE RESPONDENTS OBTAINED IN BLATANT VIOLATIONS OF SOUTH CAROLINA LAW, COURT RULES AND TWO (2) SOUTH CAROLINA SUPREME COURT OPINIONS RESULTING IN A DEPRIVATION OF AND A DENIAL OF THIS PETITIONER'S FOURTEENTH AMENDMENT - EQUAL PROTECTIONS AND A DEPRIVATION OF AND A DENIAL OF DUE PROCESS OF THE LAWS?

- a. **The Validity of Factual Evidence**, with the Petitioner, a 'natural person' being denied to proceed *pro se*, was not properly considered as the Respondents' whom had 'suffered an enrichment' and had obtained from their 'bad faith efforts' and client's 'unclean hands' had gained unfair advantage against this 'natural person' Petitioner; because these Respondents did not pay (twice) fees as money for the two witness fees and two travel reimbursements as was mandated and required for both of the R.30 USDC depositions taken AND that in 'bad faith' the Respondents created without a trial or hearing their USDC Court Order Evidence presented at the Court of Common Pleas being as Authorized Agents whom acting against this Petitioner; created a document of evidence presented and known as a USDC Rubin Order against this Petitioner as an individual; Therefore, the Respondents had suffered enrichment and gained an unfair advantage presented before these Courts by their violation of **Perry v. Minit Saver Food Services (1970) [In the South Carolina Supreme Court, Murphy v. NationsBank N.A., Opinion No. 25913 FILED December 20, 2004]** mandating a payment of witnesses fees AND consequently **In the State of**

CORPORATION; THEREBY VIOLATING THE FOURTEENTH AMENDMENTS EQUAL PROTECTIONS AND THE INTENT OF THE UNITED STATES CODE 28 U.S.C. §1654?

- III. AND DID THE COURT ERROR FURTHER TO APPLY THIS SEPARATION OF POWERS METHOD APPLICATION (*constitutional justice*) PREVENTING ANY TIMELY JURISDICTIONAL CHALLENGES, WHILE THE COURT HAS EXERTED JURISDICTION OVER THIS PETITIONER AS A FOR-PROFIT CORPORATION WHEN THE PETITIONER IS BUT A 'NATURAL PERSON'? AND ISN'T THE SEPARATION OF POWERS IS INTENDED ONLY TO KEEP SEPARATE THE 3-BRANCHES OF GOVERNMENT AND THESE LAWS WERE NOT INTENDED FOR THE JUDICIARY TO SEPARATE THE PEOPLE FROM THEIR PROFESSIONAL LICENSED LIVELYHOOD NOR TO CREATE AND JUDICIALLY SILENCE OF A VICTIM OF COURT OFFICER'S ABUSE OF DESCRETION, NOR USED IMPROPERLY TO ALLOW THE 3-BRANCHES TO TREAT THE PEOPLE DIFFERENTLY BY EACH BRANCH; WHEN THIS PETITIONER IS ACTUALLY A NO-PROFIT; NO-TAXES-PAID CORPORATION; SOLE PROPRIETORSHIP SINGLE MEMBER LLC, AS WAS BEING DONE BY THESE COURTS?
- IV. DID THE SOUTH CAROLINA COURTS ERROR TO NOT RECONGNIZE THE SUPREMACY CLAUSE & LAW OF THE USDC (YEAR 2003) CASE FILED BY THIS PETITIONER THEN AND NOW THE STATE COURT BY FAILING TO GRANT TO THIS SAME PETITIONER HIS CONTINUING *PRO SE* STANDING? [Mr. Knight] HAD BEEN THE *PRO SE* NATURAL PERSON PLATINIFF; AS WAS CAPTIONED IN THE UNITED STATES DISTRICT COURT OF SOUTH CAROLINA, CHARLESTON DIVISION IN YEAR 2003 AND AS IS SIMILARLY CAPTIONED IN THIS MATTER AT THE COURT OF COMMON PLEAS OF CHARLESTON COUNTY IN YEAR 2012 . . . THE CIVIL ACTION FILED AND SETTLED BY STIPULATION 2004 AS WAS EXHIBITED CLAIMED AGAINST THESE VERY SAME STATE COURT DEFENDANTS WHO'VE MADE NO SUCH OBJECTIONS IN YEAR 2003?
- V. RESTATEMENT OF PETITIONER'S PLEADINGS ?

Concise Statement of the Case - SCAC RULE 242(d)(3)

The Petitioner, Mr. Knight, filed a civil action at the Charleston County Court of Common Pleas pro se. From the Respondent captioned, he is seeking a **RECISSION**, and other Caused of Action about a insurance contract for which he was the personal indemnifier on a bond for a federal contract in the amount of \$462,000 USD. The Respondents countered and Hon Judge Addy decision was that the Petitioner was *pro se* and could not represent Construction Group, LLC. Mr. Knight was described in the PARTIES of the Complaint as a

Sole-Proprietorship and the Exhibits presented on RETURN to the Respondents Motion to Dismiss showed that Mr. Knight always paid taxes as a 'Natural Person'. The Petitioner, via the choice provided by the **State Code Title 12-2-25(B)(1)** and **Title 33-44-201** personally "elected to be treated as a sole-proprietorship." The Exhibits presented in the Appeal APPENDIX shows the series of several United States of America Agencies documents that treated Mr. Knight as a sole-proprietorship. Those; to name only a few: being the U.S. Department of the Treasury Schedule C; The U.S. Small Business Administration and SBA HUBZone category; the SAM registration to name a few. Also, the State of South Carolina Department of Revenue, SCDOT and even the Governor's Office on Minority Business had accepted the no-profit-sole-proprietorship choice of Mr. Knight about Construction Group LLC. It had been that way since inception in 2000.

At all times pertinent to the Court's purview in this matter, the South Carolina Legislature's House sub-committee has entertained **Bill S.377** repealing by a vote about Title 33-44 sending [i]t to the South Carolina Senate sub-committee on January 22, 2014. **Bill S.377** intends to repeal Title 33 Chapter 44 replacing it with a totally new Chapter 43; placing this Petitioner further into a state of limbo and unnecessarily complicating ALL sole-proprietorship-no-profit SMLLC's for ALL future people similarly situated like Mr. Knight in South Carolina. **S.377** presents another Original Jurisdictional Challenge at the S. C. Supreme Court. The Petitioner's challenge to the current Legislative Intent about Title 33-44-201 and [i]t is within the grasps of this **Writ**, S.377 states as being presented:

A BILL

(*in committee*)

TO AMEND TITLE 33 OF THE CODE OF LAWS OF SOUTH CAROLINA, 1976, BY ADDING CHAPTER 43 SO AS TO ENACT THE "REVISED UNIFORM LIMITED LIABILITY COMPANY ACT OF 2013", TO PROVIDE FOR THE MANNER IN WHICH AND REQUIREMENTS UNDER WHICH LIMITED LIABILITY COMPANIES ARE ORGANIZED, OPERATED, REGULATED, DISSOLVED, TRANSFERRED, AND CONVERTED, AND TO REPEAL CHAPTER 44, TITLE 33 RELATING TO THE "UNIFORM LIMITED LIABILITY COMPANY ACT OF 1996".

The Notice of Appeal was filed within 30 days of the last Order from Hon. Judge Addy and the Appeals Clerk issued a cases number. Pending the receipt of the transcript, the clerk inadvertently dismissed the appeal, but then upon Motion of this Petitioner, reinstated the

appeal with an order setting the time for the filing of this Petitioner's INITIAL BRIEF. In crossing in the mail, the INITIAL BRIEF arrived at the clerks desk on or about the same time as these Respondents Motion to Dismiss the Appeal. The Petitioner filed his RETURN to the Motion to Dismiss and APPENDIX, then there was a Judicial Notice from the Respondents of the Secretary of State for Construction Group, LLC {which was not a party to the original civil action against the Respondents} as the matter was filed for the injuries done to the Petitioner as a 'natural person' who had but indemnified the contract with the Respondent Companion - causing the Cause of Action for Fraudulent Inducement in the original Complaint. It is noteworthy that the Captions do not and did not list Construction Group, LLC but only that the Petitioner was the Sole-Proprietor of the no-profit business.. The Petitioner argues herein that *paying taxes as an individual natural person* and electing to be treated as a no-profit corporation - constitutes that a finding can only be that this no-profit corporation is not and cannot be a corporation at all as defined by Title 33-44 as alleged by the South Carolina Courts -- Thus meeting the 'Exception Clauses of both Title 12 and 33 for this Petitioner.

The Courts below and these Respondents have erred by making Construction Group LLC a Party to this matter, while the Complaint was not filed or asserted in that manner or with this intent. The Petitioner, like all Plaintiffs, asserts to be a victim (as was captioned) about the wrongs alleged in the Complaint. Again, the no corporate taxes being filed or paid is the most *discernible fact* that can rationally be applied.

The Respondents had performed as Authorized Agents for Companion, which the Petitioner's Complaint carefully labeled as the "suretyship". This case is about their bad faith dealings as there was an issue of the Clean Hands Doctrine which would have estopped any payment on the bond under the Miller Act . Also, these same Authorized Agents were colluding to not apply the Clean Hands Doctrine at the USDC matter -- because they would have been exposed as the Authorized Agents for Travelers the bond for the Plaintiffs bringing the Miller Act Claim.

These **Authorized Agents** furthered their own interests by *suffering an enrichment* from the two R.30 depositions, for which this Petitioner was not paid witness fees as are

mandated by S.C. Supreme Court Opinions, one in Perry (1970) and another in Murphy (2004). These Officers of the Court knew or should have known that they were taking an unethical bad faith advantage of the Petitioner. This is described in more detail further on.

Skipping along, the courts kept ruling that this Petitioner cannot represent a corporation. This was Judge Addy's first choice to dismiss the Complaint. The second was the USDC Order that was obtained by withholding witness pay twice for the R.30 depositions; was obtained by generating an agreement that had me paying the Plaintiff \$13,000 credit for stealing my scrap copper wire per the federal contract; {this came to light on April 26, 2013 when this Petitioner under FOIA received the Federal Police Investigative Incident Report that the Plaintiff in the Miller Act Claim admitted to Lt. J. Davis that they took the copper wires} again reinforcement of my Affirmative Defenses to the Miller Act Claim. Either one of which - had it been not withheld discovery - would have caused an absolute dismissal and then the would have been "no USDC Order" for these Respondents to have presented as Evidence before Hon Judge Addy. The third was that I could not challenge the indemnification by these Respondents. *Certainly, any contract can be challenged by the Indemnifier who they wanted to be this Petitioner making this 'natural person' a party to that bond contract.* I, not Construction Group, LLC sued seeking that **RECISSION**.

Additionally, this Petitioner wished that this **WRIT** will confirm that when all the Branches of our Government are treating him as a sole-proprietorship-no-profit-corporation and as he had been given the choice and had elected to pay taxes as a sole-proprietorship -- that no corporation exists for which the Respondents can "*hang a hat*" or prevail because their only defenses is claiming that this Petitioner is not an attorney and so cannot represent pro se the interests set forth in the Complaint.

There is a history. In the United States District Court In the Charleston Division in 2003, this Petitioner represented himself pro se against these very Respondents and together WE filed a Stipulation as we had settled our differences and they refunded me my money as a condition. This is the Law of the Case between these parties and the Precedent for this Petitioner to represent his no-profit sole-proprietorship Pro Se.

South Carolina Supreme Court On Writ of Certiorari to the Court of Appeals, State(SC) v. Adams, Opinion No. 27445 (September 10, 2014);

. . . There would be a "fundamental unfairness [in] holding citizens to 'the traditional rule that ignorance of the law is no excuse,' while allowing those 'entrusted to enforce' the law to be ignorant of it." *United States v. Chanthasouvat*, 3342 F.3d 1271, 1280 (11th Cir. 2003) (internal citation omitted) (quoting *Bryan v. United States*, 524 U.S. 184, 196 (1998)). In fact, the officers' lack of knowledge of the existence of section 17-30-40 is exacerbated in this case because the statute had been in effect for almost *six years* at the time . . .

In a like manner -- these inferior courts having weighed and considered the Respondents "Tainted Evidences" like the USDC Order before Judge Addy, while refusing to hear from the Petitioner about the very creation of the R.30 Deposition's Misconduct as a bad faith conduct of its Officers of the State of South Carolina Court(s); each knew and should have known the Supreme Courts Rules and Mandates to pay all witness' fees, provide the copy of transcripts for free and to allow 30 days of time for corrections, and redaction of any alleged deals; a deal that "even a fool would not have signed" -- this precise question was decided in **Perry v. Minit Saver Food Stores, 255 S.C. 42, 177 S.E.2d 4 (1970)**, -- misused at Common Pleas evidence and moreso at the USDC which is where these Respondents' unfair advantage was taken, that what they had done is contrary to 42+ years of South Carolina LAWS; against this Petitioner's protections about all that fruit which is forbidden (See State v. Adams); which was **to not pay** a witness fees; resulting with the wrongful and injurious ACT which shocks-the-conscience and denies this Petitioner's Fourteenth Amendments' Equal Protections of the Laws.

- i. The Petitioner, 'that witness' twice not remunerated; had asked at pre-deposition for his copy(s) of the deposition(s) to have and to read and to redact and to sign and for the witness's just payment(s) . . . but,

was denied the same by some kind of a consensus between the Agents and Attorneys that this was not allowed to Mr. Knight.

- ii. The attorney and agents then simply cleared themselves a method and wrote themselves an insurance check against the good name and reputation of this Petitioner and made a riddled-calculation agreement that *“even a fool would not have signed”* – the Petitioner did not sign the post-deposition proposed calculation about the \$13,000 of stolen copper admittedly taken by the USDC Miller Act Plaintiff from the United States Government DHS US Coast Guard Contract on or about February 17, 2011 – that USDC Order was used at Common Pleas Evidences without the Petitioner’s opportunity to challenge its credibility before it was readily being considered by Hon. Judge Addy and is continuing in these South Carolina State Court’s procedures.

II. DID THE COURT ERROR AND VIOLATE BY OVERREACHING THE SOUTH CAROLINA CONSTITUTION’S SEPARATION OF POWERS CLAUSE, ARTICLE 1 SECTION 8, FOR THE SOUTH CAROLINA STATE GOVERNMENT’S THREE (3) SEPARATE BRANCHES THAT EACH BRANCH ARE TREATING THIS PETITIONER (Mr. Knight) SIMULTANEOUSLY EQUAL AS BOTH A NATURAL PERSON AND WRONGFULLY TREATING THE PETITIONER AS A FOR-PROFIT DOMESTIC CORPORATION; THEREBY VIOLATING THE FOURTEENTH AMENDMENTS EQUAL PROTECTIONS AND THE INTENT OF THE UNITED STATES CODE 28 U.S.C. §1654? (A SUPREME LAW NEVER AMENDED BY U.S. CONGRESS ABOUT THE CONSTRUCTIVE INTENT BY CONGRESS REVAMPING THE DEFINITION OF NATURAL PERSONS)...

III. AND THE COURT ERRORS FURTHER TO APPLY THIS SEPARATION OF POWERS METHOD APPLICATION (constitutional justice) PREVENTING ANY TIMELY JURISDICTIONAL CHALLENGES, WHILE THE COURT HAS EXERTED JURISDICTION OVER THIS PETITIONER AS A FOR-PROFIT CORPORATION WHEN THE PETITIONER IS BUT A ‘NATURAL PERSON’? AND ISN’T THE SEPARATION OF POWERS IS INTENDED ONLY TO KEEP SEPARATE THE 3-BRANCHES OF GOVERNMENT AND THESE LAWS WERE NOT INTENDED FOR

THE JUDICIARY TO SEPARATE THE PEOPLE FROM THEIR PROFESSIONAL LICENSED LIVELYHOOD NOR TO CREATE AND JUDICIALLY SILENCE OF A VICTIM OF COURT OFFICER'S ABUSE OF DESCRETION, NOR USED IMPROPERLY TO ALLOW THE 3-BRANCHES TO TREAT THE PEOPLE DIFFERENTLY BY EACH BRANCH; WHEN THIS PETITIONER IS ACTUALLY A NO-PROFIT; NO-TAXES-PAID CORPORATION; SOLE PROPRIETORSHIP SINGLE MEMBER LLC, AS WAS BEING DONE BY THESE COURTS?

- a. This Petitioner having himself elected by the choice offered by the State to be totally taxed as Sole-Proprietor 'Natural Person' as Sole-Proprietorship SMLLC is now being treated differently by the State of South Carolina at all times pertinent to this litigation and wrongfully being simultaneously labeled both the 'natural person' and the 'domestic corporation' . . . **Title 12 Code as §12-2-25(B)(1)** conflicts with **Title 33 Article 2. Organization. §33-44-201 . . . a Single Member . . .** about the Court and each possible SMLLC interpretations . . . this Petitioner arguing herein further: that the **State Constitution Article 1 Section 8** mandates that the 3-Branches of Government are to keep a clear and distinct a Separation of Powers . . . IT is how the 3-Branches are to treat each other . . . But, it is not how the 3-Branches can each differently treat a 'natural person' like this Petitioner (Mr. Knight) is situated . . . **Furthermore;** this Petitioner cannot possibly, at all times, be the constituent-voting 'natural person' and the taxpaying 'natural person' about the **Legislative** and the **Executive Branches** and then is being unequally and differently declared as a for-profit corporation about interactions with the appointed-elected **Judicial Branch** . . . solely by our South Carolina's Legislative-Executive Branch's. . . while the ambiguously read current pending repealed SMLLC Laws, as it is being applied to the Petitioner in this matter, does not distinguish the Petitioner's Secretary of State Office registration of his Sole-Proprietorship dba Construction Group LLC which has not and does not in name ever pay any tax(es) and did not ever declare a monetary corporate profit and one that cannot ever meet the for-profits distinction of a for-profits corporation County, State and Federal

Revenues. . . and the Courts below have erred as IT's **Method Application** is not consistent; is not complete and/or even, is not compliant with the **South Carolina Supreme Court's Opinon No. 27032** (August 29, 2011) in **CFRE, LLC v. GREENVILLE COUNTY ASSESSOR; (CFRE, LLC Like Construction Group LLC, CFRE being treated also a SC no-profit-sole-proprietorship SMLLC)** as, **the Courts** have wrongfully and differently treated this Petitioner over his objections, as a *for-profit corporation*, while this Petitioner Mr. Knight which actually is a *no-profit-Sole-Proprietorship SMLLC* giving all proceeds and losses to himself – always acting and taxing itself as the 'natural person';. . . These two SC Legislature Laws; Title 12-2-25(B)(1) and Title 33-44-201 are conflicted here and are not with a sufficient Legislative "Constructive Intent" as IT could not have possibly met the "intent" element of the laws making requirement while the combining of these Code selections becomes **UNCONSTITUTIONAL** as **IT fails to allow these Courts a clear Method Application (a constitutional justice) to differentiate between this Petitioner (Mr. Knight) and any other SMLLC that are for-profit-corporations**, which would have to have been more clearly applied at this incomplete and most ambiguous of LAWS (currently making them an OPEN PALET FOR A COURTS TO APPLY A CONSTRUCTIVE INTENTION by being the **Proposed Amendment repealing Chapter 44 with a new different Chapter 43 by Legislature's Bill S.377** proposed now to the S.C. Senate Sub-Committee in January 2014 and) as **ONLY** this Petitioner, a 'natural person' and being a Sole-Proprietor that files and pays revenue money into S.C. State's **General Fund** including to trickle down to the 3-Branches of State government [I]t's taxes of any kinds – These Code Sections conflict: as there can be possibly a Non-Sole-Proprietorship SMLLC that does elect to pay corporate taxes unlike that of the Petitioner (Mr. Knight) that does elect to not pay any corporate taxes – -- granted that any Multi-Member LLC (MMLLC) which would obviously not be able to ever meet that distinction being an undue burden as is asserted by this Petitioner. Moreover, this Petitioner cannot be a for-profit corporation as this would be in reality but a

non-existent corporation as a corporation that does not pay any taxes at all; which is necessary for certifying any logical tangible corporate existence: As was misused by the State Courts below, and the Petitioner who has not paid corporate taxes ever being labeled as a corporation – an error that was used redundantly by the State Court(s) below and those inferior court rulings error further in that this Petitioner; being captioned as a 'natural person' was "without any standing" to bring these causes of actions *pro se* against these captioned Respondents for a **RECISSION** as a signatory and individual as is asserted the original Complaint.

IV. **DID THE SOUTH CAROLINA COURTS ERROR TO NOT RECONGNIZE THE SUPREMACY CLAUSE & LAW OF THE USDC (YEAR 2003) CASE FILED BY THIS PETITIONER THEN AND NOW THE STATE COURT BY FAILING TO GRANT TO THIS SAME PETITIONER HIS CONTINUING PRO SE STANDING?** [Mr. Knight] HAD BEEN THE *PRO SE* NATURAL PERSON PLATINIFF; AS WAS CAPTIONED IN THE UNITED STATES DISTRICT COURT OF SOUTH CAROLINA, CHARLESTON DIVISION IN YEAR 2003 AND AS IS SIMILARLY CAPTIONED IN THIS MATTER AT THE COURT OF COMMON PLEAS OF CHARLESTON COUNTY IN YEAR 2012 . . . THE CIVIL ACTION FILED AND SETTLED BY STIPULATION 2004 AS WAS EXHIBITED CLAIMED AGAINST THESE VERY SAME STATE COURT DEFENDANTS WHO'VE MADE NO SUCH OBJECTIONS IN YEAR 2003?

a. **The Supremacy Clause** in that this Petitioner had represented *pro se* in **USDC Civil Action No.. 2 03 3165 18A** in year 2003-4 (28 U.S.C. §1654); against these very same Respondents (and their previous Agents without any such objections as to this Petitioners *pro se standing* to represent himself as the Sole Proprietor SMLLC and as an Individual); asserting being adversely affected in 2012 until present time about this civil action (2012) which was captioned similarly as the civil action (2003) – the plead causes of action were for seeking to obtain a **RECISSION** of the contract with the RESPONDENT and its most recent Authorized Agents.

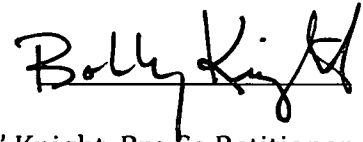
i. **Note** at both civil action captions EXHIBITED, the Petitioner is captioned as a 'natural person' and not as a corporation; and the

Parties paragraphs of both these Complaints; the Petitioners' Sole Proprietorship (SMLLC) is declared.

- ii. A *pro se* precedent had been set in the 2003-4 in USDC and was since ignored; as a issue was not addressed and access to the Courts in South Carolina -- abusively denied -- by the Court below with a general impoverishment method is the Court failing to comply with the Law of the Cases and the Precedents Set between these Parties as were captioned since 2003.

V. **THE PETIONER RESTATES FOR CONSIDERATION HIS PLEADINGS AND EXHIBITS: FILED ?**

Respectfully submitted this 30th day of October 2014.



Norman Robert "Bobby" Knight, Pro Se Petitioner
3940 Hottinger Avenue
North Charleston, SC 20405
(843) 735-0814

No. _____

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In The SUPREME COURT

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Paul R. Ryan, as an Individual & a Partner:

Respondent(s)

CERTIFICATION SCAC RULE 242(d)(1)

Norman Robert "Bobby" Knight, *pro se*, I certify that I have served : Certification by counsel
for petitioner that a petition for rehearing was made and finally ruled on by the Court of Appeals.

Respectfully submitted this 30th day of October 2014.



Norman Robert "Bobby" Knight, Pro Se Petitioner
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North Charleston, SC 20405
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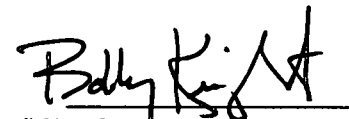
PROOF OF SERVICE

Norman Robert "Bobby" Knight, *pro se*, I certify that I have served :

PETITION ON A WRIT OF CERTIORARI TO THE COURT OF APPEALS

to Theodore Manos, Attorney for the Respondents, by depositing a copy of it in the United States Mail, postage prepaid, on June 16th, 2014, addressed to their attorney of record: Theodore Manos, % Robertson Hollingsworth & Flynn Law Firm, 177 Meeting Street, Ste 300, Charleston, SC 29401, (843) 723-6470.

Respectfully submitted this 30th day of October 2014.



Norman Robert "Bobby" Knight, Pro Se Petitioner
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