

State of South Carolina
In the Court of Appeals

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SC Court of Appeals

Appeal From Anderson County
The Honorable JC Nicholson, Circuit Court Judge
Appellate Case NO: 2013-000-879

In the Matter of the Case and Treatment of
William Downs

Appellant

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SC Court of Appeals

Appellant's Motion to Hold Appeal in Abeyance

Appellant Pro-Se hereby moves for an order to hold this appeal in Abeyance pursuant to SC App Rules, Rule 224. For Respondent is deliberately interfering in Appellant's ability to meaningfully access to the Court, when on October 23, 2014 Respondent's agents, employees of the SC Dept Mental Health confiscated 26 HD computer disks containing Appellant's legal documents, which includes material Appellant has been ordered to produce by this Court, order dated 10-24-14

mp

Appellant received said Order on Oct 28, 14 requiring Appellant to produce and file a Supplemental Record on Appeal, with a due date of approximately 20 days after service of order being Nov 16-18, 2014 and Ordering parties Final Briefs shall be served and filed Twenty days after service of the Supplemental Record on Appeal.

#1, The Ordered Supplemental Record on Appeal is quite extensive containing approximately 200 pages, which places undue hardship on Appellate to obtain sufficient paper stock in which to provide 2 copies, which requires about 2-3 weeks by itself to obtain and another week for the SCMH to produce the needed copies.

#2 The Respondent also is denying Appellant access to Resident computers/printers which also creates extreme undue hardships upon Appellate who suffers impairment and arthritis in having to hand write 3 copies of any replies / Supplemental Final Briefs

#3. The Taking of said Disk which contains approximately 19-20 million bits of information comprising of approx. 12-13,000 pages of legal text, much related to appeal
ie: was in retaliation and suspension of Appellate Filing Law Suits and on a witch hunt to find witnesses against SCDMH 7 employees who are being held for civil trial in Federal Court for excessive force when said 7 employees beat a resident for 1 hour and 45 minutes / and 3 more cases where employees sexually assaulted and beat 2 sup residents for Filing Law suits.
ie: Robinson v SCDMH et al 7 employees USDC 3:13cv-73-cmc-jem / 1:14-cv-02860-BHH-SCH
Coburn v SCDMH USDC 2:13cv-3134-MGL-BHH / 2:14-cv-01160-MGL-WWD

#4 note: that by aiding, abetting the Defendants in the referenced cases by consenting without a warrant to do so, Appellant computer Disk, the States agents now face Federal charges of intimidation of a witness in a Federal case and obstruction of justice

In the alternative of ordering a response of appeal, this court can order the Respondent to immediately return Appellant's legal files i.e. computer disk (26) and order an extension of time in which for Appellant to comply with order of 10-24-14, for Appellant to produce the Supplemental Record on Appeal.

Based on the foregoing, Appellant request the court order either the appeal into a response and or for the return of Appellate legal files, i.e. 26 computer disk and access to resident computers and or access to printer for Appellant to connect his personal wpt. for printing.

At this point Appellate can not even say when he will be able to produce the Supplemental Record on Appeal.

Respectfully submitted by

11-5-14

William Dennis
7901 Parson RD
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Columbia, SC 29203

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal From Anderson County

The Honorable J.C. Nicholson, Circuit Court Judge

Appellate Case No: 2013-000-879

In the Matter of the Care and Treatment of
William Dennis

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Appellate **SC** Court of Appeals

Proof of Service

I William Dennis certify that I have served a "Appellants to Hold
Appeal in Replevin" on Alvin Wilson / assist 16 sitypes, PO Box 11549
Columbia, SC 29211. By depositing a copy thereof into the United States
mail, with postage prepaid by appellant, as addressed on.

NOV 5 2014

William Dennis
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Cover

To The Honorable Ms. Kitching, Clerk
SC Court of Appeals

11-5-14

In Re Dennis 2013-070-899
7901 Foreman Rd, Bldg 3 3d Floor Columbia SC 29203

To: Ms. Kitching

Please find enclosed for filing Appellate Pro-se motion.
Please check stamp and return Appellate copy
in the provided envelope

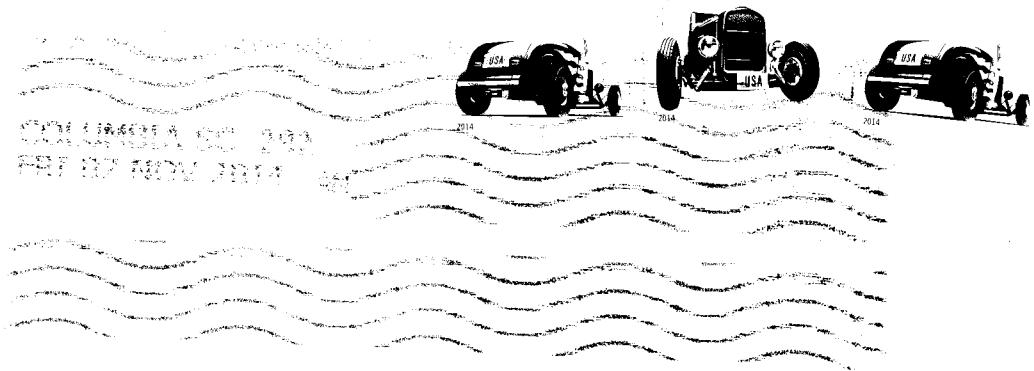
Respectfully

W. Dennis

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Honorable Ms Kitchings, clerk
SC Court of Appeal
PO Box 11629
Columbia, SC 29211

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