

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
Appellate Case No. 2014-002346

APPEAL from RICHLAND COUNTY Court of Common Pleas
Alison Renée. Lee, Circuit Court Judge
Circuit Court Case No. 2013-CP-40-03525

RECEIVED
NOV 14 2014
SC Court a.

City of Columbia, South Carolina,

Respondent,

v.

Marie-Thérèse Assa'ad-Faltas, MD, MPH,

Appellant.


APPELLANT'S MOTION FOR REMAND TO SETTLE THE RECORD ON APPEAL

By her undersigned counsel, Appellant Marie-Thérèse Assa'ad-Faltas, MD, MPH, prays this Court to remand this case to the circuit court to settle the record on appeal. In support, Appellant shows that she thrice alerted the circuit court that the record it received from Columbia's Municipal Court ("CMC") is incomplete; but the circuit court never secured all the exhibits and transcripts.

Appellant's counsel believes that consultation with opposing counsel is neither necessary nor proper for this motion. Therefore, he did not consult with opposing counsel before filing this motion.

Appellant certifies to this Court that this motion is not interposed for delay and prays this Court to grant this motion with clear and short time limits for the circuit court to settle the record on appeal.

Respectfully submitted on November 14, 2014

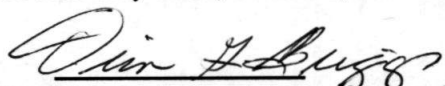

Orin G. Briggs, SC Bar # 883, Volunteer Attorney for Appellant
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(803) 957-4383

CERTIFICATE OF SERVICE

I certify that, on November 14, 2014, this document was served, by personal delivery of a copy thereof to the respective offices on the entities identified below, as proven by the attached declaration under penalty of perjury of Marie-Thérèse Assa'ad-Faltas, MD, MPH:

1. The City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina, 29201; and
2. The Attorney General of South Carolina, potential Appellate Counsel for Respondent, at his office located at 1000 Assembly Street, Columbia, South Carolina, 29201.

November 14, 2014


Orin G. Briggs, SC Bar # 883, Volunteer Attorney for Appellant

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Appellant.

DECLARATION UNDER PENALTY OF PERJURY AS PROOF OF SERVICE OF MOTION IN THIS APPEAL

I declare under penalty of perjury that, on November 14, 2014, God so willing, the foregoing motion in the above-captioned matter was served, by personal delivery of a complete copy thereof with and all attachments thereto, if applicable, to the respective offices of the entities identified below:

1. The City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina 29201; and
2. The Attorney General of South Carolina, potential Appellate Counsel for Respondent, at his office located at 1000 Assembly Street, Columbia, South Carolina 29201.

And further declarant saith not on November 14, 2014.


Marie-Thérèse Assa'ad-Faltas, MD, MPH