

RECEIVED

APR 03 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
Frank R. Addy, Jr., Circuit Court Judge

Appellate Case No. 2013-000449

Raymond W. Carter

Appellant,

v.

Donnie Myers, Solicitor, Lexington County, Tracey Carroll, Asst. Solicitor, Lexington County, Brian Buck, Irmo Police Department, Scott Franklin, Irmo Police Department, Timothy E. Stephenson, SC Law Enforcement Division, (SLED), The Estate of George D. White, Ex father in law, Tammy Carter (AKA: Tammy Kidd, AKKA: Tammy Scrogam, Ex Wife, Barbara Keadle (AKA: Diane Hinkle) Investigator, LCDSS, Francis Ross, LCDSS, Paulette Jolly, Guardian Ad Litem,

Appellees,

RESPONSE TO RESPONDENT MOTION TO STRIKE FINAL
BRIEF OF APPELLANT AND TO DIMISS APPELLANT'S APPEAL

The Appellant, Raymond W. Carter, respectfully moves for this Court to deny Respondent Myers and his attorney's vehement, consistent attempts at getting the Appellant's case dismiss. Appellant believes he has, at his best attempts to be compliant with all the rules and orders of this Honorable Court. Appellant has filed Pro Se and In Forma Paupris, does not have the funding to repeat actions to the Court, is not an attorney, nor has a competent knowledge or understanding of the law, rules, policies or procedures that would force adherence to those rules

to the Appellant's attempt to seek justice through the Courts. A simple copy of samples or the Respondent's filings, filling in the blanks has been the extent of the Appellant's efforts to correctly file and trying to comprehend the rules to follow. It is not the Appellant's intention, nor can he afford to purposely make mistakes in his filings.

An Initial Brief was filed in the Court on July 8, 2013. A Final Brief was originally filed and received on November 25, 2013 which was identical to the Initial Brief.

This last brief in question was compiled after the many attempts by the Respondent to render countless adherences to the Rules of the Court and newer evidence which was tendered to prove further of the complained accusations against all the Respondents.

No attempt has been made to "blatantly and repeatedly violate" any of South Carolina's Court Rules. That is not the intent that was behind the orchestration of any work submitted to this Honorable Court.

It's possible that the Appellant misinterpreted the Rules once they were located as a means of not amending or changing the Final Brief already on file, but giving more authority to consider for those issues under appeal. The whole of this last version of the Appellant Final Brief specifically pinpointed South Carolina Law and cases that lined up with what was already in the Initial Brief and Final Brief filed on November 25, 2013. Nothing was added or taken away from the issues brought forward under appeal. The Appellant's interpretation of SCACR 211 was that any error, mistake or reference to the Record (any part) could be corrected.

Interpretation of the Rules are somewhat tedious, time consuming and hard to interpret as one rule will refer to another and another to yet one more. Respondent's attorney believes that everyone should have the knowledge and skill he/she required in law school that allows him/her

to pinpoint such errors so hastily.

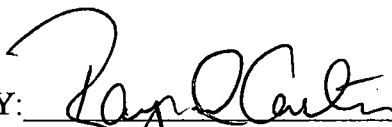
With regard to the Respondent's Motion to Strike/Dismiss, Appellant only wishes that the Respondent would have invested as much time as he has now looking for errors here in the Appellant's attempt to seek justice in his case as he should have been so vehemently enthralled with the initial protection from wrongful conviction in the first court. To the Appellant, this is nothing but admission to him of the continued maliciousness of the Respondents.

However, with the Request of the perfect Respondent with expert counsel in this case, Appellant submits another copy of the original Appellant Final Brief which is identical to the initial brief.

Apologies are expressed to all parties in this matter at this misinterpretation as it is for certain Appellant doesn't have the funding to keep redoing materials he thought was getting the court to address the issues presented. His intent is solely to seek justice in this case, nothing more.

In conclusion, Appellant asks this Honorable Court to deny the Respondent's Motion to Strike/Dismiss and accept the Appellant Final Brief enclosed already on file with the Court.

Respectfully Submitted,

BY: 
Raymond W. Carter
2219 Leesburg Road
Columbia, SC 29209

Columbia, SC

March 26, 2015

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

APPEAL FROM LEXINGTON COUNTY

APR 03 2015

Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2013-000449

Raymond W. Carter

Appellant,

v.

Donnie Myers, Solicitor, Lexington County, Tracey Carroll, Asst. Solicitor, Lexington County, Brian Buck, Irmo Police Department, Scott Franklin, Irmo Police Department, Timothy E. Stephenson, SC Law Enforcement Division, (SLED), The Estate of George D. White, Ex father in law, Tammy Carter (AKA: Tammy Kidd, AKKA: Tammy Scrogam, Ex Wife, Barbara Keadle (AKA: Diane Hinkle) Investigator, LCDSS, Francis Ross, LCDSS, Paulette Jolly, Guardian Ad Litem,

Appellees,

CERTIFICATE OF SERVICE

The undersigned Appellant, does hereby certify that service of the Response to Respondent's Motion to Strike Final Brief of Appellant and Motion to Dismiss Appeal of Appellant in the above caption matter, have been placed, one copy in the United States Mail, postage paid, this 26th Day of March, 2015, upon those indicated below:

David L. Morrison
Kassi B. Sandifer
7453 Irmo Drive
Columbia, SC 29201

William H. Davidson
Andrew F. Lindemann
1611 Devonshire Drive

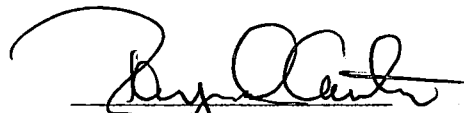
PO Box 8568
Columbia, SC 29209-8568

Timothy E. Stephenson
Behavior Disorders
709 Trolley Road
Summerville, SC 29485

The Estate of George White
1249 Highway 44 W.
Shepherdsville, KY 40165-8056

Jenny A. Kitchings, Clerk
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Tammy A. Kidd
1246 Blue Lick Road
Shepherdsville, KY 40165



Raymond W. Carter
2219 Leesburg Road
Columbia, SC 29209

Columbia, SC

March 26, 2015

Raymond Carter
2219 Leesburg Road
Columbia, SC 29209-3055

March 26, 2015

Jenny A. Kitchings, Clerk
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RECEIVED
APR 03 2015
SC Court of Appeals

RE: C/A 2013-000449, Carter v. Myers, et al

Dear Madam Clerk,

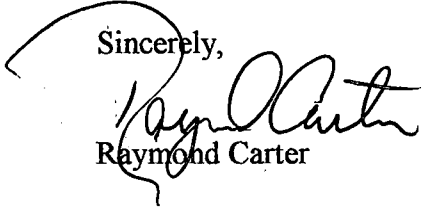
Enclosed please find a copy of Appellant's Response to Respondent's Motion to Strike Appellant's Final Brief and Motion to Dismiss Appellant's Appeal.

Also enclosed is a perfected Appellant Final Brief which is in compliance with SCRPC 211. This brief is identical to the Appellant's initial brief and has the certificate of compliance included.

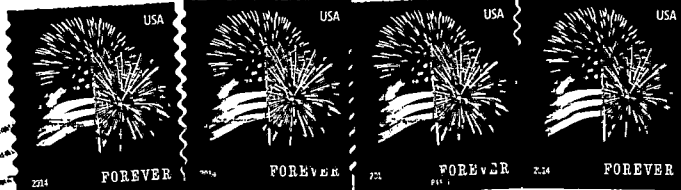
If you need anything else from me to bring this appeal to proper form, do not hesitate to contact me.

Thank you for your continued time, patience and attention to this matter.

Sincerely,


Raymond Carter

cc: File



COLUMBIA SC 292

THU 02 APR 2015 PM

RECEIVED

APR 03 2015

SC Court of Appeals

Jenny A. Kitchings, Clerk
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211