

Clarence S. Gregory, . . . APPELLANT.

VERSUS

Riley Pope AND Laney, SC Court of Appeals  
ET AL. . . . . Respondent.

RECEIVED

APR 20 2015

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NOTICE OF MOTION AND MOTION  
TO OBTAIN BINDING AND COPY  
IMPOSITIONS

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Please take Notice, and pursuant to South Carolina Appellate Court Rule, Rule 240 (SCACR), the Appellant, Gregory, by way of prose, in the above captioned appeal, do hereby respectfully request this Honorable Court at this time, to please permit the "Filing" of original and one (1) copy of his briefs and Record on Appeal as opposed to the number of copies

- Called For in Rules 210 (b) and 211 (d), OF SCACR; and Obviate the binding impositions set forth in Rule 267 (d), OF SCACR.

This said Motion is based on one (1) or more of the Following grounds set forth herein:

## INTRODUCTION

### I. Extraordinary Circumstances:

Appellant asserts, as a result, he is incapable of complying with the S.C. Appellate Court Rules as regarding to the number of Copies of documents, and, the bindings required to perfect his appeal.

Recently, the BRCI Mail Room and Business Office, Stemmed From

The Agency, S.C. Department of Corrections' General Counsel has direct their agents to limit and restrict copying legal materials access to court for inmates to only one (1) or two (2) photo-copies.

The Appellant, Gregory respectfully requests this Court to allow him to file the original and one (1) copy for his clocked stamped record, and allow him to use staples and document clamps instead of bindings, and serve the same upon the Respondent, in order that the Appellant, Gregory may "enjoy" his right to access to the courts as guaranteed by the 14th Amendment to the United States' Constitution and of the S.C. Constitution of Amendment.

## CONCLUSION

WHEREFORE, for these reasons,  
the Appellant, prays that this Court  
grants him his said motion.

Respectfully submitted,  
I am Clarence S. Gregory  
CLARENCE S. GREGORY, #221394  
C/O BROJ  
MURRAY UNIT, B-Wing Rm. 234  
4460 Broad River Road  
Columbia, S.C. 29210-4812

PRO'SE APPELLANT NOTICE /  
MOTION TO OBTAIN BONDING  
AND COPY IMPOSITIONS

DATED: APRIL 15<sup>TH</sup>, 2015

AFFIDAVIT OF CLARENCE S. GREGORY  
#227394 SCDC NO.

NOW COMES, APPELLANT.

1). Pursuant to Rule 240(c)(3),  
SCACR, the facts that I have  
asserted by virtue of this petition  
notice/motion are true and correct  
to the best of my knowledge and  
belief.

Furthermore, Affiant sayeth  
naught!

Clarence S. Gregory  
CLARENCE S. GREGORY, #227394

Sworn to and subscribed to and before me,  
this 16th day of April, 2015:

Susan H. Frye  
NOTARY PUBLIC FOR STATE, SOUTH CAROLINA

MY COMMISSION EXPIRES: My Commission Expires  
March 5, 2018

# CERTIFICATE OF SERVICE

I, CLARENCE S. GREGORY, #221394, do hereby certify that a true and correct copy of the document listed below has been sent by United States' Mail To:

- 1). NOTICE / MOTION TO OBTAIN BINDING AND COPY IMPOSITIONS;
- 2). APPELLANT'S AFFIDAVIT

SERVED UPON:

THE HONORABLE JENNY KITCHINGS,  
CLERK OF COURT, C/O S.C. COURT OF  
APPEALS, 11629, P. O. BOX  
COLUMBIA, S.C. 29211-1629

Mr. Riley Pope & Laney, LLC, ET AL.

CONT'D. APPELLANT'S Certificate, Service

c/o Mr. Damon C. Wlodarczyk,  
ATTORNEYS AND COUNSELORS AT LAW  
2838 Devine Street,  
Post Office Box 11412  
Columbia, S. C. 29211-1412  
(Respondents)

Clarence S. Greber  
CLARENCE S. GREBER #227394  
c/o BRCE  
Murray Unit, B-Wing Km. 234  
4466 Broad River Road  
Columbia, S.C. 29210-4412

Richland County,  
Columbia, South Carolina 29210

Dated: April 15, 2015

Clarence S. Gre Gory # 227394  
c/o Broad River Correctional Inst..  
Murray Unit, B-WING Km. 234  
4460 Broad River Road  
Columbia, S.C. 29210-4812

RECEIVED  
APR 20 2015  
SC Court of Appeals

VIA U.S. Regular Mail

Date: April 15, 2015

To: Mr. Riley Pope & Laney, LLC.  
c/o Mr. Damon C. Wlodarczyk, Esquires  
ATTORNEYS AT LAW  
2838 Devine Street.  
P.O. Box 11412  
Columbia, S.C. 29211-1412

Re: Gre Gory vs. Riley Pope & Laney, LLC et AL.  
C/A No: 2013-CP-40-03078

Dear Mr. Wlodarczyk:  
Defendant's Counsel;


Please Find enclosed a copy of the

CONT'd: PAGE TWO (2), COVER LETTER  
TO: MR. DAMON C. WLODARCYK, ESQUIRE.  
C/A NO. 2013-CO-40-03078  
Dated: April 15, 2015

Followings:

- 1). Two Cover Letters, ONE (1) TO YOUR OFFICE, ONE TO SC, COURT OF APPEALS;
- 2). NOTICE / MOTION / AFFIDAVIT IN SUPPORT TO OBLIATE BINDING AND COPY IMPOSITIONS;
- 3). APPELLANT'S (AFFIDAVIT) OF CERTIFICATE OF SERVICE!

By copy and being in receipt of this, you have been served as of this date.

Sincerely, I am  
  
Clarence S. Gregory #22394

cc. The Hon. Jenny Kitchinds, Clerk of Court, S.C. Court of Appeals

Clarence S. Gregory, #227394  
c/o BRCT, Murray Unit,  
B-WING Rm. 234  
4460 Broad River Road  
Richland County  
Columbia, S.C. 29210-4012

VIA U.S. Regular Mail

Dated: April 17, 2015

TO: The S.C. Court of Appeals  
c/o The Honorable Jenny A. Kitching's  
Clerk of Court  
Post Office Box 11629  
Columbia, S.C. 29211-1629

Re: Clarence S. Gregory, #227394 vs.  
Riley Pope & Laney, LLC, ET AL.,  
Appellant Case No. 2015-000740

Subj: Enclosed Original Copy of  
Amended Notice / Motion to  
Obviate Binding And Impositions

CONT'D PAGE TWO (2), APPELLANT'S COVER  
LETTER, TO: Hon. JENNY A. KITCHINGS, Clerk

Dear Hon. Kitchings:

Please find enclosed original  
and copies for filing purposes  
an amended copies of the  
or my (Appellant's) notice and  
motion, etc. To obviate  
binding and copy impositions.

Pursuant to your letter dated  
April 15, 2015, which advised  
me (Appellant), to correct the  
deficiencies in the "caption-title"  
which does not comply with  
Rule 267 (a), SCACR.

Respectfully Submitted,  


CLARENCE S. GREGORY, # 227394  
Appellant Pro'se 2015-066740

cc:

MR. DAMON C. WŁODARCZYK, Esquire  
FOR Defendant / Respondents  
Dated April 17, 2015

Clarence S. Gregory, # 227394  
C/O Broad River Correctional Inst.,  
Murray Unit, B-Wing Rm. 234  
4460 Broad River Road  
Columbia, S.C. 29210-4012

VIA U.S. Regular Mail

RECEIVED  
APR 20 2015  
SC Court of Appeals

Dated: April 15, 2015

To: The Honorable Jenny Kitchings  
C/O Clerk of Court, S.C. Court of  
Appeals, Post Office Box 11629  
Columbia, S.C. 29211-1629

Re: Gregory vs. Riley Pope & Laney, LLC  
ET AL.  
CIA NO. 2013-CP-40-03078

Subj: Respectfully Enclosed, Notice,  
MOTION, etc.

Dear Honorable Clerk:

Please Find enclosed an original Notice,

CONT'D, PAGE TWO (2) Cover letter

TO: Hon. Jenny Kitchings, Clerk of Court  
of S.C. Court, Appeals CLAND. 2013-CP 40-03078  
Dated: April 15, 2015

- MOTION, AFFIDAVIT, and Certificate of Service.

Please note, you'll be receiving a postal money order for the amount of an \$100<sup>00</sup> (Hundred Dollars) for Filing Fee, and following, you'll receive.

\$125<sup>00</sup> (Twenty Five dollars) for the motion to obviate binding & copy impositions!

My friend, Evangelist Queen Frost,  
at P.O. Box 1394, New Brunswick,  
New Jersey 08903, sent the U.S. postal  
money order on/ov about, Monday,  
April 13, 2015.

IT takes approximately  
3 to 4 days from New Jersey to  
South Carolina:

Conclusion, Page Three (3) Cover Letter  
- To: Hon. Jenny Kitchings, Clerk of Court  
S.C. COURT OF APPEALS  
CA NO. 2013-CP40-03078  
Dated April 15, 2015

Thank you so kindly for your  
cooperation and assistance in this  
matter!

Respectfully submitted,  
Clarence S. Greaney, Jr.  
CLARENCE S. GREANEY, # 227394  
APPELLANT, Pro' se

cc: Mr. Riley Pope & Laney, LLC. ET AL.  
c/o Mr. Damon C. Wlodarczyk,  
Defendants Counselor/Esquire

5

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

APR 20 2015

SC Court of Appeals

APPEAL FROM THE RICHLAND COUNTY  
COURT OF COMMON PLEAS FROM  
ORDERS OF HONORABLE G. THOMAS  
COOPER, JR., CIRCUIT COURT JUDGE:

CASE NO.(S): 2013-CP-40-03078  
2007-CP-40-03742

SUBSEQUENT INTERLOCUTORY  
ORDER OF (FORMER) CIRCUIT COURT  
JUDGE, HONORABLE J. MICHELLE  
CHILDS:

CASE NO.(S): 2007-CP-40-03742  
2009-CP-40-02442

AND-SUBSEQUENT INTERLOCUTORY  
ORDER OF CIRCUIT COURT JUDGE,  
HONORABLE DEANDREA GIST  
BENJAMIN:

CASE NO.: 2009-CP-40-02442