

3
THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

City of Charleston Special
Events Committee, Respondent,

-versus-

King Grant-Davis, Appellant.

RECEIVED

MAY 27 2015

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Judge

Case No. 2014-CP-10-7740

APPELLANT'S R E P L Y TO THE RETURN TO
MOTION TO PROCEED IN FORMA PAUPERIS

In addition to Appellant's papers to this Court dated May 13 and 15, 2015, and for a Reply to the Respondent's Return dated May 19, 2015 (of which appellant received by mail on Thursday p. m. May 21st), appellant respectfully submits that the economic extraordinary circumstances of poverty in his situation warrants the litigation relief he seeks in this Court.

Respondent's argument suggesting the relief sought by appellant requires alteration or adjustment to the Appellate Court Rules of which it does not concur is academic and misplaced.

(1) Rule 240(d), SCACR does not indicate such restrictiveness on the actions of this Court.

(2) Rule 1, SCRCP (which govern the procedure in all South Carolina courts in all suits of a civil nature) purposes the provisions of Rule 73, SCRCP, . . . and all the rules un SCACR to secure the just, speedy, and **inexpensive** determination of every action. This Court is indeed empowered to take broad action to afford an **uncounseled** and **indigent** litigant / appellant a **real chance** to effectively proceed and exercise her or his right of access to this Court, when otherwise that person's financial predicament would not permit it (such as the overburden of costs for producing and mailing multiple photocopies of documents, et cetera).

SINCERELY,

King Grant-Davis

King Grant-Davis
95 Nassau Street
Charleston, S. C. 29403
(843) 722-9965

Appellant, Pro se

Dated: May 22, 2015

To: Frances I. Cantwell
Assistant Corporation Counsel
City of Charleston Legal Department
50 Broad Street
Charleston, S. C. 29401
(843) 724-3730
Attorney for Respondent

5

STATE OF SOUTH CAROLINA,)
)
COUNTY OF CHARLESTON)
)
King Grant-Davis)
Plaintiff(s))
vs.)
City of Charleston Special)
Events Committee)
Defendant(s).)

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

AFFIDAVIT OF SERVICE

FILE NO: 2014-CP-10-7740
(Charleston County Court of Common Pleas)

PERSONALLY APPEARED BEFORE ME, the undersigned deponent, who being duly sworn
says that (s)he served the Appellant's Reply to the Return to Motion in this action
to Proceed In Forma Pauperis
(Describe document(s) served)

on Frances I. Cantwell, Assistant Corporation Counsel of City by delivery to
of Charleston, Attorney for the Respondent
(Name of party served)

at City of Charleston Legal Department, 50 Broad St personally;
Street, Charleston, S. C. 29401 (843) 724-3730
(Name of party served)

_____ the _____ of the party served,
(Name of person served) (Note relationship to party)

_____ the _____ of _____
(Name of person served) (Title) (Name of corporate party served)

and leaving with (him) (her) a copy at _____
(Street address)

in _____ County, South Carolina,
(City or Town) _____ County

on May, 2015 at _____ o'clock, and by
Charleston County Sheriff's Office of Civil Process Service.

___ **Unable to locate and serve the above process on the**
defendant after diligent efforts to do so.

The process is returned unexecuted.

Sworn to and Subscribed before me
this 22 day of May, 2015)
[Signature])
Notary Public for South Carolina)

My Commission expires July 31, 2017)

King Grant-Davis
Signature of Deponent

SIID# 100863668
exp. 2-4-16

Entered in the Sheriff's Book on _____

Book _____ Page _____ Number _____

STATE OF SOUTH CAROLINA,
COUNTY OF CHARLESTON

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

MAY 27 2015

King Grant-Davis
Plaintiff(s)

vs.
City of Charleston Special
Events Committee
Defendant(s)

SC Court of Appeals

AFFIDAVIT OF SERVICE
FILE NO: 2014-CP-10-7740
(Charleston County Court of Common Pleas)

FILED
2015 MAY 22 10 30 AM
CLERK OF COURT

PERSONALLY APPEARED BEFORE ME, the undersigned deponent, who being duly sworn
says that (s)he served the Appellant's Reply to the Return to Motion
to Proceed In Forma Pauperis in this action
(Describe document(s) served)

on Frances I. Cantwell, Assistant Corporation Counsel of City
of Charleston, Attorney for the Respondent by delivery to
(Name of party served)

at City of Charleston Legal Department, 50 Broad St
Street, Charleston, S. C. 29401 (843) 724-3730 personally;
(Name of party served)

[Signature] the Secretary of the party served,
(Name of person served) (Note relationship to party)

_____ the _____ of _____
(Name of person served) (Title) (Name of corporate party served)

and leaving with (him) (her) a copy at _____
(Street address)
in _____ County, South Carolina,
(City or Town) County

on May 22, 2015 at 2:00 o'clock, and by
Charleston County Sheriff's Office of Civil Process Service.

Unable to locate and serve the above process on the
defendant after diligent efforts to do so.

The process is returned unexecuted.

Sworn to and Subscribed before me
this 22 day of May, 2015
[Signature]
Notary Public for South Carolina

[Signature]
Signature of Deponent

My Commission expires July 31, 2017

SD# 100863668
exp. 2-4-16

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Book _____ Page _____ Number _____

May 22 , 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, S. C. 29211

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MAY 27 2015

SC Court of Appeals

RE: King Grant-Davis -v- City of Charleston
Special Events Committee
Charleston County Court of Common Pleas
Case No. 2014-CP-10-7740

Special Events Committee, Respondent, v.
King Grant-Davis, Appellant.

DEAR MS. KITCHINGS:

Enclosed please find for filing the **original** and **six** **copies** of appellant's **Reply** to respondent's **Return** to the **Motion to Proceed In Forma pauperis**, as well as an **Affidavit Of Service** of a copy of the **Reply** upon the attorney for the Respondent by Charleston County Sheriff's Office Civil Process Service.

Sincerely,

King Grant - Davis

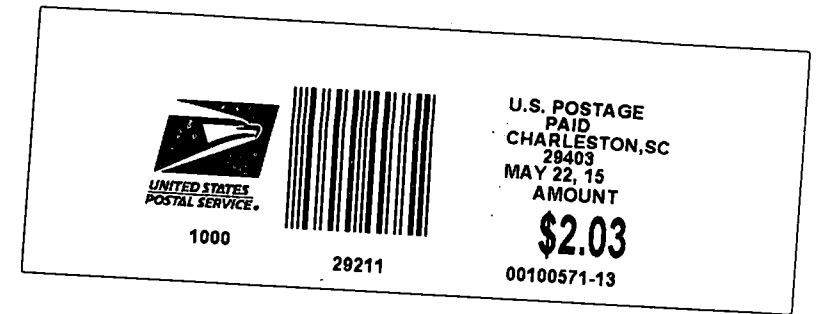
King Grant-Davis
95 Nassau Street
Charleston, S. C. 29403
(843) 722-9965

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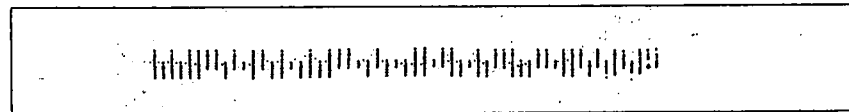
To: Frances I. Cantwell
Assistant Corporation Counsel
City of Charleston Legal Department
50 Broad Street
Charleston, S. C. 29401
(843) 724-3730

Attorney for Respondent

King Grant-Davis
95 Nassau Street
Charleston, S.C. 29403



To: The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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