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JUL 08 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

DeAndrea G. Benjamin, Fifth Judicial Circuit Court Judge

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Appellate Case No. 2015-000061

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Brenda G. Harmon-----Appellant,

V.

Joel E. Johnson, D.M.D-----Respondent

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REPLY TO;

RESPONDENT'S MOTION TO DISMISS APPEAL AND THE ALTERNATIVE  
CHALLENGE THE RECORD ON APPEAL AS SUBMITTED

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Brenda G. Harmon  
2110 Woodfield Drive  
Columbia, South Carolina 29223  
Attorney for Appellant: Pro Se'

## Response to Motion to Dismiss

Respondent's complaint to the Court is the Appellant has failed to provide an adequate record on her Appeal, therefore the case should be dismissed. The very first complaint to the Court (lower), that the Case was frivolous. However, I, the Appellant is not the first nor will I be the last to try to receive JUSTICE. I, the Appellant cannot pin myself to a sheet of paper to show what has been done to me, that is impossible. What has happened to me is the reason that my body does not function as well as it should, however I am not fighting to hurt the Dentist, but what the Dentist did. There is nothing I can do about my atrocities of pain but take medicines or have surgery. This is something that was done to me, whether it was done accidental or intentional, but the failure to say, "I'm sorry," is not a very hard thing to do. The level of where this case has gone is far beyond the, "I'm sorry stage." This Dentist has demonstrated that he is far more superior than I am, not because of money, but because of race. This is not the First time I have mentioned how he feels, therefore I ask the Court to go forward with a hearing and let it be known that this Doctor does not have to pick up a Gun, but by being in the Medical field, licensed by the State of South Carolina, he is given the right to shorten your life. I, the Appellant have had 11, surgeries, from my atrocities of pain, there is no way that could be classified as frivolous. Our laws of Government grant me the right to try and seek relief for my suffering. As for the 10 day status of filing before deadline, that is a given right. What I, the Appellant is seeing from the defense is, I have no rights, especially being a black female, who will suffer for the rest of her days with pain, regardless whether she have surgery or not. All I'm asking the Courts for is Justice. Am I not entitled to that right? ?, Are we not in America?

### RESPONSE TO: IN THE ALTERNATIVE CHALLENGE THE RECORD ON APPEAL AS SUBMITTED

Granted, I am not an Attorney. I am fighting for my rights as a person (being), that this Dentist tried to delete from this world, and showed no sign of forgiveness. He just simply went out and hired an Attorney who also showed no interest in what has happened to the appellant. It was the great Fredrick Douglas who said, "I might not get everything I work for, but I will damn sure work for

what I get.” I am working hard to get a response that complies, to the reality that shows my disability. I have my notes that was mentioned throughout this case, I have pictures, however, the best picture is me, myself. I have 48 prescriptions of medicine prescribed and given to me over an 18mo. period. I have medical doctors that will testify to what they wrote, I, the Appellant is ready for the CHALLENGE.

As for the cases that was used in the request of challenge, Germain v. Nichol, 278 S. C. 508, 509, 299 S.E.2d 335 (1983). This case has no precedential value. It should not be cited or relied on as a precedent in any proceeding. Again, I the Appellant have shown reason that the defendant does not care. He is showing you the Appellant Justices, that you don’t know what you’re doing. Equality, where is it? That your right to interpret, is flawed.

In Johnson v. Dept. of Prob., Parole and Pardon, 372 S.C.279,641 S.E.2d 895 (207), there are many cases under this name and number, which most decisions given by the lower Courts was reversed by Appeal.

On this motion requested to THE STATE OF SOUTH CAROLINA COURT, In the Court of Appeals/Richland County, I, the Appellant Brenda G. Harmon, Pro Se’, agree that this case be heard.

Respectfully,  
  
Brenda G. Harmon

2110 Woodfield Drive

Columbia, South Carolina 29223

Appellant: Pro Se’

8-8-2015

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CERTIFICATE OF SERVICE

I, duly swear to the Courts, on this day July 8, 2015, that I have served the Respondent Representative, Kelli L. Sullivan, via S. C. Sheriff Dept., to 1303 Blanding Street, Columbia, S. C. 29201

Brenda G Harmon, Pro Se'

2110 Woodfield Drive

Columbia, S. C. 29223

*Brenda G. Harmon*  
*8/8/2015*

July 8, 2015

Law Offices

Mckay, Cauthen, Settana & Stublely, P. A.

C/O Kelli Sullivan

1303 Blanding Street

Columbia, S. C. 29201

Re: Brenda G. Harmon v. Joel E. Johnson, DMD

Appellate Case No. 2015-000061

Dear Attorney Sullivan:

I, the above named Appellant response (Reply), to your motion for Dismiss and Alternative, Challenge the Record on Appeal as Submitted, on the above date and filed with the Court of Appeal on the same date.

Sincerely yours

*Brenda G. Harmon*

Brenda G. Harmon

*8/8/2015*