

**SOUTH CAROLINA APPEALS COURT  
P.O. BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211**

STATE OF SOUTH CAROLINA  
COUNTY OF SPARTANBURG

LAUNEIL SANDERS

IN COMMON PLEAS COURT  
CASE NO. 2010-CP-42-5527

Plaintiff  
VS.

**RECEIVED**

MAY 14 2012

**SC Court of Appeals**

JANNETH E. SANDERS  
BURTS,TURNER AND RHODES,C/O RICHARD RHODES  
SPARTANBURG COUNTY  
DEFENDANTS

“RETURN FILED IN RESPONSE TO RESPONDENT’S MOTION TO DISMISS  
PURSUANT TO RULE 240.(f)”

***I. EXECUTIVE INTRODUCTION***

A. That I, Launeil Sanders, file this Return Response for South Carolina Appeals Court not to DISMISS case:

B. That respondents were properly served the Determination of Matter with all items , and additionally served what matter was to be included on Record On Appeal.

1. That defendant, Janneth Sanders, never, ever filed any response to the original complaint. That I filed a Default Judgment before the Common Pleas Court on January 25, 2011, Hearing and Judge Cole ERRED as he did not follow Law and issue Default Judgment, which was the Standard LAW to do inn this Case. DISMISSAL OF THIS APPEAL WILL RESULT IN ADDITIONAL HARDSHIP UPON ME.

2. ,That the South Carolina Supreme Court requires a Mediation Hearing in about six months after the complaint has been filed. In this particular instance No Mediation Hearing has been held to determine which issues can be settled prior to Jury Trial. Thus, Judge Cole had no priority, prestige, or authority to Dismiss against defendants Spartanburg County and Burts Turner and Rhodes.

3. That Richard Rhodes did File a Frivolous Lawsuit against Me, Launeil Sanders, in October 2010. He has not been punished for His Action, nor any action taken against

Him. That Richard Rhodes did not possess any grounds for Filing this Divorce Action and Punishment should be rendered against Him. **And furthermore, Richard Rhodes in the Pre-Trial hearing on March 2, 2012, the Corrupt Rhodes used The Condition on Separation of One Year as Rule for Granting DIVORCE, which was DEFINITELY NOT AVAILABLE YO HIM IN OCTOBER 2010 OR NOVEMBER 2010. More tremendous Corrupt Misconduct by attorney Richard Rhodes.**

c. That Judge Cole ERRED on January 25, 2011; and it should be kicked back to the Common Pleas Court for Trial.

## **II. ISSUES AND ARGUMENTS DISCUSSED**

### **A. First Issue**

1. That Judge Cole should have issued Default Judgment Against Janneth Sanders on the January 25, 2011, Hearing. That Judge Cole ERRED and did not follow South Carolina Law , and South Carolina Common Pleas Court Rules and Law. That this case under South Carolina LAW, should not have been dismissed on January 25, 2011. That it doesn't matter whether he felt he had Authority, Power, or Prestige to intervene in a Family Law case; as there were many, many violations in the Family Law situation. His First Priority was to intervene and Rule as South Carolina Law, and Issue Default Judgment against Janneth Sanders. Defendant, Janneth Sanders, never, ever filed any response to the original complaint filed in October 2010. That I filed a Default Judgment before the Common Pleas Court on January 25, 2011, Hearing and Judge Cole ERRED as he did not follow Law and issue Default Judgment. Thus, this action should be reversed and remanded back to the Common Pleas Court for trial.

### **B. Second Issue**

1. That Judge Cole ERRED as HE did not consider that the Plaintiff, Attorney Richard Rhodes never, ever had ANY GROUNDS for filing this Divorce Action as his Client , Janneth Sanders, never, ever possessed any of the four Grounds that the South Carolina General Assembly said was Required when filing such action. Judge Cole ERRED as he should have Issued Action to require Richard Rhodes to define his Grounds he Filed under, for in the October 2010 and November 2010 Documents filed by Richard Rhodes before the Court, nothing is ever shown for which of these FOUR GROUNDS he is filing this action.

### **C. Third Issue**

1. That Mr. Richard Rhodes is Guilty of Legal Malpractice as he did file a frivolous, illegal lawsuit against me, Launeil Sanders. That Mr. Richard Rhodes should have had one of the Four Grounds for Divorce Filing, and should have stated them in the Documents

before the Court in Order to receive a Degree of Separate Maintenance. Mr. Rhodes did not accomplish this nor did he come close to accomplishing this.

#### **D. Fourth Issue**

1. That with respect to my 1990 Issue when my WIFE, who died of Liver Cancer, I had a triple Corrupt Police Officer Sister in Law, Georgia West, who kidnapped my TWO BIOLOGICAL CHILDREN FROM 4729 Worden Drive, Spartanburg, South Carolina, AND TOOK THEM TO GASTONIA, NORTH CAROLINA, (GASTON COUNTY, WHERE NEITHER OF PARENTS HAD EVER LIVED). She, the triple corrupt COP, Georgia West, got An Emergency Custody ORDER, in violation of North Carolina Law # 90-CVD-2566, and after July 25, 1990, I NEVER EVER GOT MY TWO BIOLOGICAL CHILDREN BACK! You see, I have SUED Gaston County and the State of North Carolina in U.S. Federal Court many times, but the U.S. Federal Court Doesn't Care about Family Law CRIMES, or any other kind of Federal Kidnapping. You, simply never get access to the U.S. Federal Courts. You see, for ten years, MY SPOUSE and I, Launeil Sanders, had lived in LINCOLN COUNTY, Lincolnton, North Carolina. In this TEN years prior to moving to Spartanburg, South Carolina. Gaston County never, ever had JURISDICTION, and many Criminal felonies were Committed by Gaston County and its triple corrupt agents. I have been fighting for twenty years in the Corrupt U.S. Federal Court System and have never gotten ACCESS! I don't know when I will ever get access, but I do believe there is ONE CHRISTIAN in the U.S. 4<sup>th</sup> Circuit Appeals Court in Richmond, Virginia, who will eventually step forward in this specific Matter In *Mr. William Hardwicke Rhodes* before the Court on January 25, 2011, "I would assume that some decision has probably been made within this 20 years on the merits of the case and so it should be barred by Res Judicata." This is just another triple corrupt false statement by another *irresponsible*, garbage ridden, Attorney, Hardwicke Rhodes.

#### **D. Fifth Issue**

1. My U.S. Social Security Benefits would be DEPRIVED from going to my wife. That since my wife is 30 years my Junior, she has not thoroughly thought through the matter, and would be willing to give up approximately over \$750,000 assuming she outlives me by thirty years. The FORFITURE of this three- quarter of a Million Dollars has not been fully devoured by my spouse, Janneth Sanders. My spouse, Janneth Sanders, thinks she can come down and pay an Attorney money, "and that that Specified Attorney Will Get her Anything She Wants!" This type of philosophy and the severe misconduct by her Counsel, Richard Rhodes, is NOT ANY FORM OF JUSTICE.

#### **D. Sixth Issue**

1. Spartanburg County has to be held liable as, they as the County in which we live, must monitor all Conditions within the County. That Spartanburg County must play an important role in deriving "Livable Conditions" for all residents. As if many false deeds and actions are being perpetrated by corrupt attorneys, Spartanburg County must intervene and Establish Some Written Forms and or

Formal Written Documents that would have to Be Signed by the Attorney(s) filing any Action in Common Pleas Court.

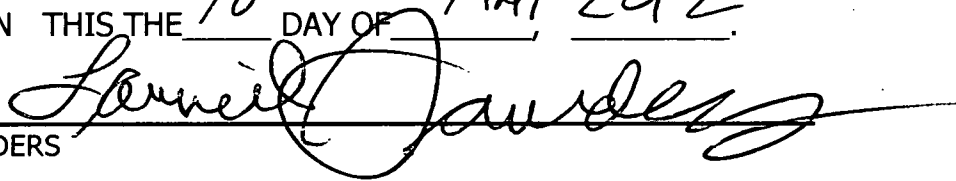
**D. Seventh Issue**

1. That my spouse , Janneth Sanders, and I, Launeil Sanders, had Sexual Intercourse three times from November 11, 2010, until November 23, 2010, in Violation of Judge Sinclair's November 2010 ORDER. That I filed Action and MOTIONS for Dismissalin February 2011. A hearing was Held in March 2011 in Family Law Court and MY MOTIONS were Disallowed. You see, MY MOTIONS to have the case Dismissed were Dismissed and Family Law Case Continued. My RIGHTS were equally Violated as there is no Such Thing as Equal Justice in the Spartanburg Family Law Court. It's about following the LAW, as Spartanburg County has to insure that all ATTORNEYS will follow the Law and comply with the Provisions that the General Assembly of South Carolina Establishes.

**E. Eighth Issue**

1. Legal Malpractice by Attorney Richard Rhodes-- The legal malpractice by Attorney Richard Rhodes should be sanctioned, and sanctions against Richard Rhodes have to be assessed. Just because someone pays you money, doesn't mean you do not have To comply with the Law and the South Carolina General Assembly. Mr Rhodes has to be assessed penalties for the wanton, flagrant, deliberate violations of South Carolina Law. Mr Rhodes did not comply with the South Carolina Statutes, but should have. He Does not get a "Free Pass " to violate the South Carolina Statutes as if he did Nothing wrong.

RESPECTFULLY Submitted ON THIS THE 10<sup>th</sup> DAY OF MAY 2012.



COLONEL LAUNEIL ( "Neil" ) SANDERS  
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**CERTIFICATE OF SERVICE**

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05/10/2012

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" RETURN TO RESPONDENT;S MOTION TO DISMISS CASE # 2011191726

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That I, Launeil Sanders, the undersigned certify that we have this date served a copy of "South Carolina Appeal Brief" by depositing a copy of same in the United States Mail, with sufficient postage attached thereto, to following address:

1. BURTS, TURNER AND RHODES  
c/o Richard Rhodes, Attorneys for Plaintiff  
P.O. Box 3408  
Spartanburg, South Carolina 29304  
Phone 864-585-8166

*mailed a copy by U.S.  
Mail to Defendant  
Launeil Sanders*

2. JANNETH E. SANDERS  
593 SHORELINE BOULEVARD  
BOILING SPRINGS, S.C. 29316-6164

*mailed a copy to  
defendant by U.S. Mail  
with sufficient postage  
Launeil Sanders*

3. SPARTANBURG COUNTY's Counsel  
Holcombe Bomar P.A.  
100 Dunbar Street, Suite 200  
Spartanburg, South Carolina 29306  
P.O. Box 1897  
Spartanburg, South Carolina 29304

*mailed a copy by  
U.S. Mail to  
defendant with  
sufficient postage  
Launeil Sanders*

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