

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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SEP 25 2015

ERICK E. HEWINS*

APPELLANT

S.C. SUPREME COURT

v.

APPELLATE CASE NUMBER

STATE OF SOUTH CAROLINA

2015 - 00595

RESPONDENT

{ REPLY TO OUT OF TIME RESPONSE / MOTION TO DISMISS }

THE APPELLANT IS A PRO SE LITIGANT AND ASKS NOT BE HELD TO

THE STANDARDS OF THOSE DRAFTED FOR ATTORNEYS. THE RESPONDENTS ANSWER IN THE FORM OF A WRITTEN LETTER IS NOT IN

ACCORDANCE WITH THE RULES OF APPELLATE PROCEDURES.

THIS HONORABLE COURT SHOULD RESPECTFULLY GRANT THE APPELLANT MOTION TO DISMISS, THAT THE STATE CLAIMS

IMPROPERLY SET FORTH ARGUMENTS NOT IN ACCORDANCE WITH THE RULES OF APPELLATE PROCEDURES.

A MOTION TO STRIKE FOR INSUFFICIENT DEFENSE RULE 12(F)

THE RESPONDENTS HAVE DEFAULTED APPELLATE PROCEDURE

RULE 3.1 BY FAILING TO RESPOND IN A TIMELY MANNER

RULE 3.1 APPELLATE COURT RULES.

THE RESPONDENTS WENT BEYOND THE DEADLINE AND

DEFAULT SHOULD BE RESPECTFULLY ENTERED AGAINST

THEM IN ACCORDANCE WITH APPELLATE COURT RULES.

A LAWYER SHALL NOT BRING OR DEFEND A PROCEEDING OR ASSERT OR CONTROVERT AN ISSUE THEREIN UNLESS THERE IS A BASIS FOR DOING SO, THAT IS NOT FRIVOLOUS, WHICH INCLUDES GOOD FAITH AN ARGUMENT FOR AN EXTENSION, MODIFICATION OR REVERSAL OF EXISTING LAW.

THE APPELLANT RESPECTFULLY SUBMITS THAT THIS COURTS FAILURE TO ENTER A DEFAULT JUDGMENT AGAINST THE RESPONDENTS WOULD RESULT IN FUNDAMENTAL MISSCARRIAGE OF JUSTICE.

DATED September 22, 2015

RESPECTFULLY SUBMITTED

S. Eric Newis

MCCORMICK #1 F-2-B-

386 REDEMPTION WAY

MCCORMICK, SOUTH CAROLINA

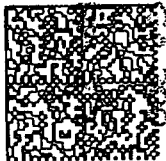
29899

Eric Hewins - 291128

McCormick Correctional Institute
386 Redemption Way
McCormick, SC 29899

AUGUSTA

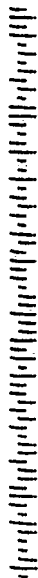
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The Honorable Daniel E. Shearouse
Clerk of Court, South Carolina Supreme Court
P.O. Box 1133D
Columbia South Carolina 29211

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McCORMICK CORRECTIONAL INST.
S.C. DEPARTMENT OF CORRECTIONS

THE DEPARTMENT OF CORRECTIONS HAS NOT
INSPECTED OR CENSORED THIS ITEM; THEREFORE,
THE DEPARTMENT DOES NOT ASSUME RESPONSIBILITY
FOR ITS CONTENTS.

MAIL ROOM

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