

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

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NOV 04 2015

SC Court of Appeals

Via U.S. Regular Mail

Date: October 30, 2015

TO: Riley Pope & Laney, LLC  
C/o Mr. Damon C. Wlordazyk, Esquire For Respondent  
Attorneys & Counselors at law  
2838 Devine Street  
P.O. Box 11412  
Columbia, S.C. 29211-1412

RE: Clarence S. Gregory, #227394 vs. Riley Pope & Laney, LLC  
Appellate Case No.: 2015-000740

Subject: Enclosed, Request/Affidavit For Original Copy of Your  
Filed Respondent's Initial Brief & Designation of Matter,  
Pursuant to Rule 208 (a), (2), SCACR.

Dear Mr. Damon C. Wlodarczyk/Respondent's Legal Counsel:

In reference to the above-subject action, it's my understanding based upon information and belief, you've filed your Respondent's Initial Brief and Designation of Matter, etc., on/or about, October 23, 2015, but you've "failed" to provide and serve Appellant with a copy and proof, as required by Rule 208 (a) (2), SCACR.

My siblings has contacted the BRCI Mailroom, U.S. Postal Service/Office, and there is absolute no trace of any leg. material identifying with any of your postal registered meter showing or identifying and addressing any service to serve the Appellant, transmitting it to the Broad River Correctional Facility Mailroom, from the time-frame period that based upon (sic) upon information, since you've claimed you've filed a brief, with the Clerk, of the S.C. Court of Appeals, on/or about October 23, 2015 thru October 30, 2015.

I am respectfully requesting that you send me a certified copy for the record, that I may filed a reply, Rule 208 (a) (3), SCACR.

Sincerely, I am

S/

  
CLARENCE S. GREGORY, #227394

Cc: The Honorable Jenny A. Kitchings, Clerk of S.C. Appeals  
Court /10/30/15

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

NOV 04 2015

Appeal From The Richland County  
Court of Common Pleas From Orders of  
Honorable G. Thomas Cooper, Jr.,  
Fifth Judicial Circuit Court Judge

SC Court of Appeals

Appellate Case No.: 2015-000740

Case No.(s): 2013-CP-40-03078  
2007-CP-40-03742

Subsequent Interlocutory Orders of (Former) Circuit Court Judge,  
Honorable J. Michelle Childs:

Case No.(s): 2007-CP-40-03742  
2009-CP-40-02442

Subsequent Interlocutory Order of Circuit Court Judge,  
Honorable De Andrea Gist Benjamin:

Case No.: 2009-CP-40-02442

Clarence S. Gregory, . . . . . Appellant,  
Verses

Riley Pope & Laney, LLC, Law Firm, Attorney(s) and Counselor(s)  
at Law; Individually and Individually named; Theodore D. Riley,  
T. Lowides Pope, LeRoy Free Laney, Nikole H. Boland, Of whom  
All are sued In Their Individual and Professional Capacities,  
Riley Pope & Laney, Limited Liability Contractor(s)(LLC);

AND

Heath McAlvin Stewart, III, Individually and Individually named  
Of who, Formerly Employed with Riley Pope & Laney, LLC, Law  
Firm, An Agent Attorney Is Sued In His Individual and

Professional Capacities, Et Al.,

All Whom are named as Defendants,  
Of Which, Riley Pope & Laney, LLC, Is The Respondent.

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APPELLANT'S AFFIDAVIT IN SUPPORT OF  
LETTER OF REQUEST

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1). That, on/or about, September 30, 2015, respective Deputy Clerk, V. Claire Allen, of the S.C. Court of Appeals, by Order, granted the Respondents' counsel, Damon C. Wlodarczyk said motion for extension of time to file and serve Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal;

2). Which Respondents' motion was filed on/or about September 23, 2015, on the last-day, time-frame period to serve Respondent's Initial Brief, under the provisions of procedural mandated Rule, Rule 208 (a) (2), of the S.C. Appellate Court Rules;

3). That, the aforesaid Order granted by respective Deputy Clerk, Allen, permitted Respondents' counsel Wlodarczyk an extension for thirty (30) days, until October 23, 2015;

4). That, based upon information and belief, the Respondent's have filed their Responsive Brief and Designation of Matter with the Clerk of the S.C. Court of Appeals, on/or about, October 23, 2015, either by Via Hand-Delivered, or by Facsimile, or by electronic, but has not served the Appellant a certified copy or an original copy, as required by Rule 208 (a) (2), of

APPELLANT'S AFFIDAVIT IN SUPPORT OF LETTER OF REQUEST, APPELLANT'  
CASE NO.: 2015-000740, DATED OCTOBER 30, 2015

RECEIVED

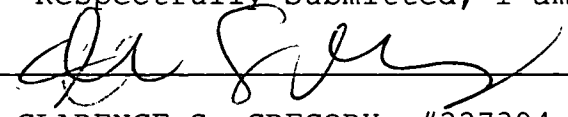
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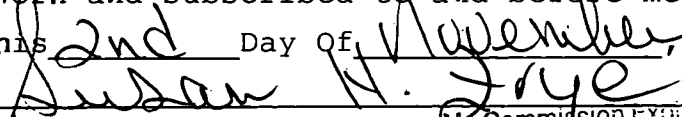
SC Court of Appeals

5). That, The Broad River Correctional Institution, Mailroom Staff, Ms. Susan F. Frye, Nor Mr. Rodney Cox, aver that they inquired the matter at the U.S. Postal Office, and that the U.S. Post Office staff, has not transmitted any identified legal material or received any legal materials from the Riley Pope & Laney, LLC, Law Firm, with the Riley Pope & Laney, LLC, Registered meter, identification number, on/or about, October 23, 2015, through October 30, 2015; Identifying Appellant's name addressing it to the Broad River Correctional Institution, Via Mailroom;

FURTHERMORE, I SAYETH NAUGHT!

RICHLAND COUNTY,  
COLUMBIA, SOUTH CAROLINA  
ZIP CODE 29210-4012

Respectfully Submitted, I am  
s/   
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

Sworn and Subscribed to and before me,  
This 2nd Day of November, 2015.  
  
My Commission Expires: March 5, 2018  
Notary Public For State of South Carolina.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal From The Richland County  
Court of Common Pleas From Orders of  
Honorable G. Thomas Cooper, Jr.,  
Fifth Judicial Circuit Court Judge

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Appellate Case No.: 2015-000740

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Case No.(s): 2013-CP-40-03078  
2007-CP-40-03742

Subsequent Interlocutory Orders of (Former) Circuit Court Judge,  
Honorable J. Michelle Childs:

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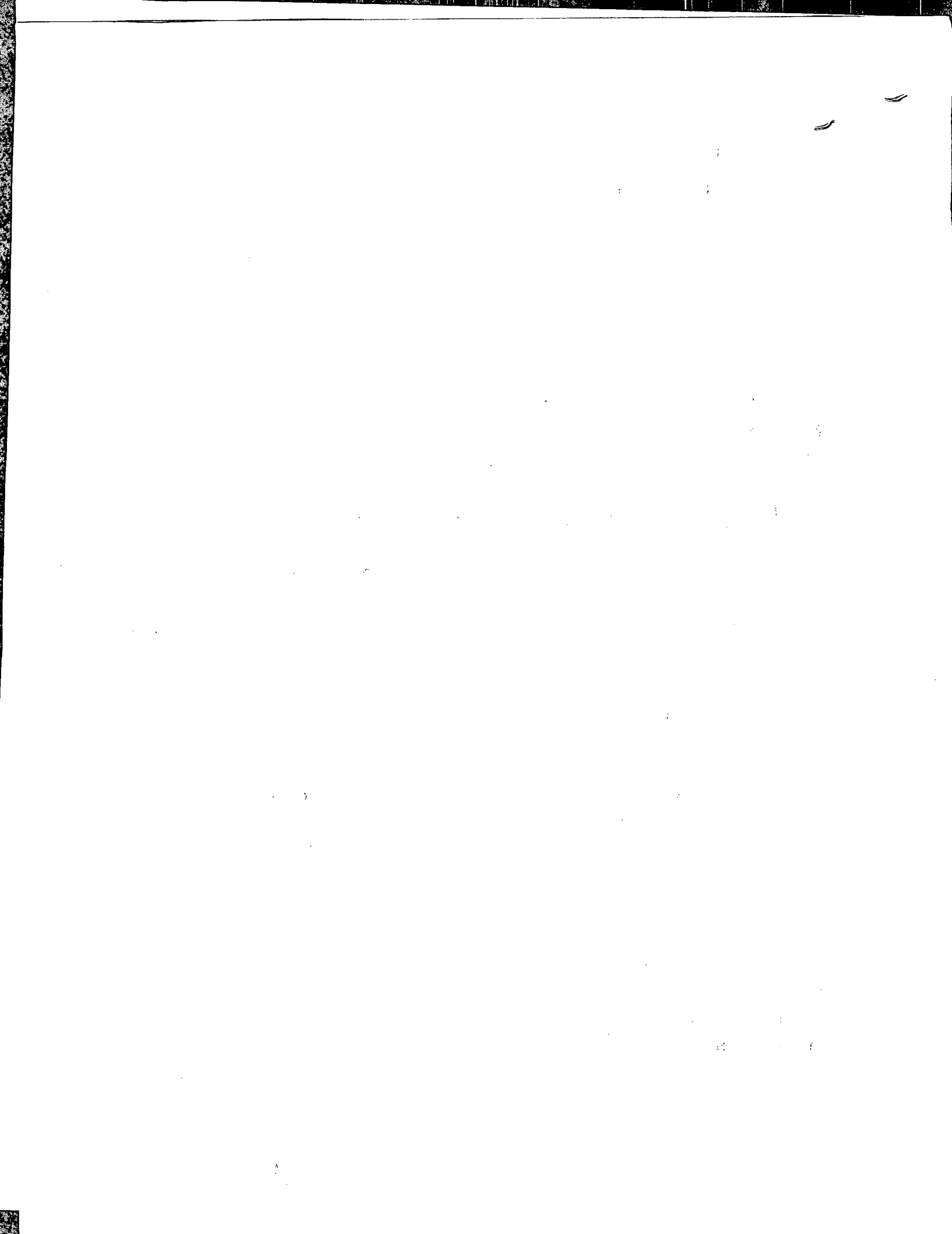
Clarence S. Gregory, . . . . . Appellant,

Verses

Riley Pope & Laney, LLC, Law Firm, Attorney(s) and Counselor(s)  
at Law; Individually and Individually named; Theodore D. Riley,  
T. Lowndes Pope, LeRoy Free Laney, Nikole H. Boland, Of whom  
All are sued In Their Individual and Professional Capacities,  
Riley Pope & Laney, Limited Liability Contractor(s)(LLC);

AND

Heath McAlvin Stewart, III, Individually and Individually named,  
Of who, Formerly Employed with Riley Pope & Laney, LLC, Law  
Firm, An Agent Attorney Is Sued In His Individual and



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Columbia, S.C. 29210-4012

Via U.S. Regular Mail

Date: October 30, 2015

TO: The S.C. Court of Appeals  
C/o Honorable Jenny A. Kitchings  
Clerk of Court  
1220 Senate Street  
Post Office Box 11629  
Columbia, S.C. 29211-1629

RE: Clarence S. Gregory, #227394 vs. Riley Pope & Laney, LLC  
Appellate Case No.: 2015-000740

Subject: Enclosed, Request/Affidavit For Original Copy of  
Respondent's Counsel "filed" Respondent's Initial Brief  
And Designation of Matter, Etc., Pursuant to Rule 208  
(a) (2), SCACR

Dear Ms. Kitchings/Clerk of Court:

In reference to the above-subject matter, based upon information and belief, on/or about, October 23, 2015, it is believed that the Respondents' has filed their Initial Brief and Designation of Matter, etc., in meeting their extended dead-line time period.

However, on the contrary, the Respondent's has "not" served Appellant a copy with proof of service, as required by Rule 208 (a) (2), SCACR.

It is an ten (10) days, time-frame period, once the Respondent has filed his brief, the Respondent "shall" serve one (1) copy of his brief on all parties to the appeal and file the clerk of court of the appellate court one (1) copy of the brief with proof of service.

Furthermore, the Appellant has a right to a copy and has a right to file a "reply," opposing the Respondent's Brief

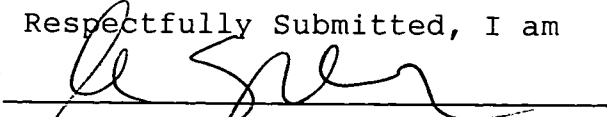
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as a procedural due process right, guaranteed under the State Const.'s provision, Art., I, sec. 9 and 22, and under the U.S. Const.'s provisions Amend. 14th and under the equal protection of laws, that is a meaningful opportunity to present his objections.

Finally, I am respectfully requesting this Court to please provide me a copy of the Respondent's Brief.

If I need to pay for a copy, please let me know in advance!

Richland County,  
Columbia, South Carolina  
Zip Code 29210-4012

Respectfully Submitted, I am  
s/   
CLARENCE S. GREGORY, #227394

October 30, 2015

Appellant Case No.: 2015-000740

Appellant's Letter of Request/  
Affidavit In Support

Cc: Mr. Damon C. Wlodarczyk, Esquire For Respondent  
10/30/15