

IN THE
SOUTH CAROLINA COURT OF APPEALS

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SC Court of Appeals

CASE # _____

Tyhone Laman ROBERTSON

Appellant

VS

South Carolina Dept of Corrections
Office of General Counsel, et al.

Respondent

NOTICE OF APPEAL
FROM THE STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT, BEFORE
JOHN D. MCLEOD IN CASE No. # 15-ALJ-04-0256-AP
ORDER

This appeal is taken from an adverse order of the State of South Carolina Administrative Law Court in Case No. # 15-ALJ-04-0256-AP dated October 13, 2015. Appellant received written notice of this adverse order by mail October 16, 2015...

THIS APPEAL FOLLOWS:

This court has jurisdiction of the appeals under 28 U.S.C. § 1252, providing for appeals to this court from

Judgments holding an Act of Congress unconstitutional in any civil action to which the United States is a party. Under 28 U.S.C. § 1252 This section provides in part: "Any party may appeal to the Supreme Court from an interlocutory or final judgment, decree or order of any court of the United States ... holding an Act of Congress unconstitutional in any civil action, suit, or proceeding to which the United States or any of its agencies, or any officer or employee thereof, as such officer or employee, is a party."

ARGUMENT

A Court "must take jurisdiction if it should. The Judiciary cannot, as the legislature may, avoid a measure because it approaches the confines of the Constitution. We cannot pass it by, because it is doubtful. With whatever doubts, with whatever difficulties, a case may be attended, we must decide it, if it be brought before us. We have no more right to decline the exercise of jurisdiction which is given, than to usurp that which is not given. The one or the other would be treason to the Constitution. Questions may occur which we would gladly avoid; but we cannot avoid them." *id.*, at 481, UNITED STATES V. WELLS, cite as 101 S. Ct. 471 (1980), (emphasis added). *id.* "Because of the individual relation of the members of this Court to the question..., we cannot but regret that its solution falls to us.... But jurisdiction of the present case cannot be declined or renounced. The plaintiff was entitled by law to invoke our decision on the question as respects his own compensation, in which no other Judge can have any direct

personal interest, and there was no other appellate tribunal to which under the law he could go." And some litigants would be denied their right to a forum. The public might be denied resolution of this crucial matter if first the District Judge, and now all the Justices of this Court, were to ignore the mandate of the Rule of Necessity and decline to answer the questions presented.

STATEMENT OF FACT

In case No. # 15-ALJ-04-0256-AJO Appellant Tyone Lamar Robertson brought a claim of an unlawful employment practice for an SCDC McCormick, Perry, Evans, Lee, Kirkland, Allendale connections institution private industry Educational / Vocational Rehabilitation Training by ██████████ Palmetto Unified School District No. # 1 Industrial Commission classification Employer - (I) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin.

Appellant Tyone Lamar Robertson has brought race discrimination claims under Title VII and § 1981 in case No. # 15-ALJ-04-0256-AJO asserting he has a constitutional protected life, liberty or property interest to be rehabilitated with educational / vocational employment job training, workers compensation, inmate pay incentive, unemployment compensation, supplemental security income allowance benefits, and contact visitation rights with family, wife and friends for the development of healthy productive and constructive socio-economic relations behavioral communication skills - And that the SCDC Respondents February 18, 2015 security detention 30 day review reclassification to remain in level security detention punishment segregation restrictive custody confinement that were consecutively and arbitrarily imposed for 6 years on Appellant Robertson since April 12, 2010 consecutive to January 18, 2011 administrative transfer to McCormick connections institution - that is a facially neutral disability job classification security detention status custody that can be and are used for improper discriminatory

purposes to disparitly signal out, and arbitrarily select Appellant Tyrone Lamar Roberson for a socio-economic denial of all workers compensation, inmate pay incentive, supplemental security income allowance, and South Carolina unemployment compensation benefits pay freeze... and prevented Appellant from transferring back to general population reclassified Educational / Vocational Rehabilitation Training Job Employment pay position as other white students, patients, clients, prisoners, inmate employee workers similarly situated. And the same Respondents conduct complained of has arbitrarily deprived the Appellant Tyrone Lamar Roberson of that state and federal protected Liberty and property interest entitlement without constitutionally adequate procedure to be heard at a meaningful time or in a meaningful manner in violation of the due process clause.

The due process clause focuses on the nature of deprivations, the impact that restrictions may have on inmates, and the effect of conditions of confinement, length of time in confinement that must be the focal point of constitutional Eighth Amendment analysis. see also Robinson v. California, 370 U.S. 660, 666, 82 S.Ct. 1417, which made applicable to the states the Eighth Amendment's ban on cruel and unusual punishments.

And the significant disparity between the severity of the harm to the individual Appellant Tyrone Lamar Roberson occasioned by the actions of an administrator rather than an Act of Congress... where the action involves an affirmative disability or arbitrary restraint security detention of Appellants Liberty and property interest entitlement where the behavior to which it applies has expired and is excessive in relation to the January 6, 2022 purpose assigned, courts must be justified in drawing an inference of corporal punishment with cruel and unusual punishment in violation of S.C. Constitution Article 2, §15 of the United States Constitution Eighth Amendment Right that made applicable to the state and federal Government by virtue of the United States Constitutional Fourteenth Amendment.

The detainees Appellant constitutional protection against punishment is nothing more than a prohibition against inhumane classifications or barbaric treatment. Having recognized in theory that the source of that protection is the due process clause,

the court has in practice defined its scope in the far more permissive terms of equal protection and Eighth Amendment analysis.

Appellant assents while confining him in a security detention custody level segregation restricted liberty and property confinement punitive space restraint in such a manner as to cause him to endure genuine deprivations and hardship over an extended 6 years period of time might raise serious questions under the due process clause as to whether those conditions amounted to punishment.

"The United States Constitution Fifth, Eighth and Fourteenth Amendment protection retained by prisoners include those afforded by the due process clause against unlawful restraint and arbitrary deprivations of state and federally protected liberty and property interest entitlement of Appellant Tyrone Lamar Robertson? Also prisoners are protected against invidious discrimination on the basis of race under the Equal protection clause of the Fourteenth Amendment, see Lee v. Washington, 390 U.S. 333, 88 S.Ct. 994, 19 L.Ed. 2d 1772 (1968). A residuum of constitutionally protected rights remains. see S.C. Code of Law Title Section Statute § 24-5-90. Discrimination in treatment of prisoners unlawful.

see S.C. Code of Law Title Section Statute § 10-5-290. Action for violation of regulations. Any person who is injured, deprived of employment, denied access to public buildings or facilities or is otherwise deprived of his rights as a citizen as declared in the statement of state policy set forth in § 10-5-210 may enforce his rights by injunction and recover damages in a proper case in the court of common pleas when his action is based on a violation of regulations promulgated by the commission.

Denying Appellant Tyrone Lamar Robertson any chance to challenge arbitrary abusive assertions of power by correctional officials, and barring him from legitimate opportunities such as gainful employment to receive student, patient, client, inmate, prisoner employee worker's compensation, inmate pay incentive, supplemental security income allowance, South Carolina unemployment compensation payout benefits, are inconsistent with the correctional goals of rehabilitation, which emphasizes the need to instill respect for and willingness to cooperate with society and to help the offender assume the role of a normal citizen. [A] person's liberty is equally protected, even when the liberty itself is a statutory creation of the state; see S.C. Code of Law Title Section Statute § 24-3-40. Disposition of wages of prisoner allowed to work at paid employment;

as it relates to S.C. Code of Law title Section Statute §§ 42-1-10 et seq. South Carolina Workers Compensation Act.; as it relates to S.C. Code of Law title Section Statute §§ 41-27-10 et seq. South Carolina Unemployment Compensation Act.; as it relates to BEUC policy ADM-15.13, § 2, INMATE PAY -; as it relates to S.C. Code of Law title Section Statute § 24-3-90. Prisoners sentenced by United States authorities.; as it relates to S.C. Code of Law title Section Statute § 24-3-160. Costs of maintaining convicts by state institution.

*The unemployment insurance program collects taxes from employers covered by the law and payout unemployment benefits to unemployed workers under both state and Federal law.

As it relates to S.C. Constitution Article XXV, § 2. Institutions for confinement of persons convicted of crimes. The General Assembly shall establish institutions for the confinement of all persons convicted of such crimes as may be designated by law, and shall provide for the custody, maintenance, health, welfare, education, and rehabilitation of the inmates. (1970 (56) 2883; 1971 (57) 46).; as it relates to S.C. Code of Law title Section Statute § 24-3-170. Payments by Clemson University for use of convicts.

"A liberty interest may originate in the constitution," or it may have "its roots in state law" see Boeken v. Henman, cite as 35 F. Supp. 2d 99 (D.C. 1999), id. at 100; 9. Constitutional Law § 277(1)

in order to have a property interest protected by the Fifth Amendment due process clause, courts must determine whether an independent source, such as a statute, establishes a legitimate claim of entitlement to compensation. U.S.C.A. Const. Amend. 5.

A hostile work environment exists "when the workplace is permeated with discriminatory intimidation, ridicule and insult, that is sufficiently severe to alter the conditions of the victims employment"

Title VII forbids an employer to retaliate against an employee for engaging in protected activity see 42 U.S.C. § 2000e-3(a).

AUTHORITY: 42 U.S.C. § 2000e-5(b); 29 U.S.C. § 211; 29 U.S.C. § 626; 42 U.S.C. § 12117; 42 U.S.C. § 2000ff-6.

ARGUMENT

Appellant Tyrone Laman Roberson asserts during February 18, 2015; June 16, 2015; June 30, 2015; July 21, 2015; October 12, 2015; and October 13, 2015 SCD Respondents took deliberate actions of Retaliation against Appellant Tyrone Laman Roberson who oppose employer Job discrimination or who filed charges at a State or local Administrative Law Court Fair Employment Practices Agency or who cooperated in any investigation against SCD Respondents with Charlotte District Office Equal Employment Opportunity Commission 129 WEST TRADE STREET, SUITE 400 CHARLOTTE, NORTH CAROLINA 28202 during April 3, 2015, and April 21, 2015...; or who filed formal Administrative complaint concerning this charge with The S.C. Administrative Law Court during June 11, 2015 in case Docket No. # 15-ALJ-04-0256-AP. See McCormick Connections Institute Grievance Coordinator Grievance file No. # MCC 92-15... Appellant filed a step one grievance on February 22, 2015, this grievance was investigated and denied by Respondents; Appellant filed a step two grievance on March 5, 2015, this grievance was also investigated and denied.

In Appellant Tyrone Laman Roberson Notice of Appeal to the Administrative Law Court filed June 1, 2015, along with step 1 and step 2 grievances clearly implicate a state created and federally protected liberty and property interest entitlement in case Docket No. 15-ALJ-04-0256-AP asserting: It shall be unlawful for sheriffs or jailers to make any discrimination in the treatment of prisoners placed in their custody. — that creates hostile work environment "when the workplace is permeated with discriminatory intimidation, ridicule and insult, that is sufficiently severe to alter the conditions of the Appellant Robersons employment in SCD EVANS, Lee, McCormick, and Allendale connections Institute employer unlawful discrimination employment practice for an employer - (1) to fail or refuse to hire or to discharge Appellant, or otherwise to discriminate against Appellant Tyrone Laman Roberson with respect to his compensation, inmate pay incentive, supplemental security income allowance benefits because of such Appellants race, color, religion, sex, or national origin... and the SCD Respondents conduct complained of has deprived the Appellant Roberson of that interest without constitutionally adequate procedure. see LOGAN V. ZIMMERMAN BRUSH CO., 455 U.S. 422, 428, 102 S. Ct. 1148, 71 L. Ed. 2d 265 (1982).

ARGUMENT

Appellant Tyrone Laman Roberson also asserted in case Docket No. 15-ALJ-04-0256-AP that SCDC Respondents private party who acts under color of law could be characterized as hiding behind the authority of law and as engaging in "Joint participation" with the state in the deprivation of constitutional rights to secure the application of a prison regulation security detention custody policy: op-22.12, § ; and disciplinary custody policy: op-22.14, § , that so plainly unconstitutional as to enjoy no presumption of validity... That violates S.C. Code of Law Title Section Statute § 16-17-735 impersonation of state or local official or employee or law enforcement officer or asserting authority of state law in connection with a sham legal process.

Appellant further contends that private Respondents classification personnels conspired with the South Carolina Department of Corrections et al, private contractors to indefinitely "deprive Appellant Tyrone Laman Roberson of his state and Federally protected Liberty and property interest entitlement rights to enjoy equal treatment and services in a place of public accommodation," and apparently to cause Appellant Robersons discriminatory and legally baseless arrest under a Vagrancy statute... As it relates to Respondents acts on omission with conspiracy against civil rights in violation of S.C. Code of Law title section Statute § 16-5-10.; as it relates to Respondents acts on omission ~~with~~ with Assault or intimidation on account of political opinions or exercise of civil rights by Appellant Tyrone Laman Roberson in violation of S.C. Code of Law title section Statute § 16-17-560.; as it relates to Respondents acts on omission in violation of S.C. Code of Law title section Statute § 24-5-90. Discrimination in treatment of prisoners unlawful.

It shall be unlawful for sheriffs or jailers to make any discrimination in the treatment of prisoners placed in their custody.

To establish a prima facie claim for retaliation, Appellant Roberson would need to show that He (1) participated in a protected activity known to the defendants; (2) suffered an adverse employment action; and (3) that there is a causal connection between the protected activity and the adverse employment action. (emphasis added) KHAN V. ABERCROMBIE & FITCH, INC., cite as 35 F.Supp. 2d 272 (E.N.Y. 1999), id. at 277; GLASSER, District

Judge: &V Retaliation [10, 11].

However, under section 704(a) of Title Vxx, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of EONA, it is unlawful for an employer to discriminate against present or former employees or job applicants, or for an employment agency to discriminate against anyone, or for a union to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal pay Act has similar provisions and section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

See SUMMONS V. SOUTH CAROLINA STATE PORTS AUTHORITY, cite as 495 F. Supp. 1239 (1980), id. at 1239: 1. Civil Rights § 38

Under Title Vxx, a plaintiff may not bring suit in district court unless charge has been filed with EEOC within 180 days of occurrence of alleged unfair practice; any failure to comply with statute deprives district court of subject matter jurisdiction. Civil Rights Act of 1964, § 706 (d) as amended 42 U.S.C.A. § 2000e-5(e).

2. Civil Rights § 13.10

Under South Carolina law, appropriate limitations period for employment discrimination suits brought under either section 1981 or 1983 is six years. 42 U.S.C.A. §§ 1981, 1983; Code S.C. 1976, § 15-3-530.

id. at 1239: 6. Civil Rights § 40

In employment discrimination cases, statute of limitations under Title Vxx runs from time of act of alleged discrimination. Civil Rights Act of 1964, §§ 701 et seq., 706 (d) as amended 42 U.S.C.A. §§ 2000e et seq., 2000e-5(e).

See SUMMONS V. SOUTH CAROLINA STATE PORTS AUTHORITY, cite as 495 F. Supp. 1239 (1980), id. at 1242: BLATT, District Judge: [2] 42 U.S.C. §§ 1981 and 1983 have been recognized as creating a cause of action for employment discrimination. Johnson v. Railway Express Agency, Inc., 421 U.S. 454, 95 S. Ct. 1716, 44 L. Ed. 2d 295 (1975), Acha v. Beame, 438 F. Supp. 70, 77 (S.D.N.Y. 1977), affirmed, 570 F. 2d 57 (2nd Cir. 1978). Since these statutes provide no period of limitations, it is necessary to refer to the appropriate

period established by state statute. This court held in Lewis v. Bloomsburg Mills Inc., 8 FEP cases 742 (D.S.C. 1974), that section 1981, which preserves the right to make and enforce contracts, is most analogous to an action to enforce a contract right, and that the six (6) year South Carolina statute of limitations for contract actions should apply to section 1981 suits.

The Fourth Circuit Court of Appeals has analogized section 1983 to a tort action, saying "in essence, § 1983 creates a cause of action where there has been injury, under color of state law, to the person or to the constitutional or federal statutory rights which emanate from or are guaranteed to the person. In the broad sense, every cause of action under § 1983 which is well-founded results from 'personal injuries.'" Almond v. Kent, 459 F.2d 200 (4th Cir. 1972).

This court is of the opinion, therefore, that the appropriate limitation period for a section 1983 suit is six (6) years, which is the period in South Carolina applicable to actions for "any... injury to the person or rights of another, not arising on contract..." South Carolina Code of Laws § 15-3-530.

ARGUMENT

However, due to the Respondents and the Administrative Law Court Judge John D. McLeod October 13, 2015 dismissed with prejudice orders in case Docket No. 15-ALJ-04-0256-AP entered on erroneous misapprehension of the facts, as here page 2, Lines 21 through Lines 22: There is clearly no state created liberty or property interest implicated here. Id. page 2, Lines 9 through Lines 10: Consequently, the review in these inmate grievance cases is limited to the Record presented.

Id. page 1, Lines 17 through Lines 18: The courts appellate jurisdiction in inmate appeals is limited to cases involving denial of state created liberty interest. [Foot Note 1. The court does have limited jurisdiction in some property matters, the authority for which need not be cited here.] typically involving: (1) cases in which an inmate contends that prison officials have erroneously calculated his sentence, sentence-related credits, or custody status, and (2) cases in which an inmate has received punishment in a major disciplinary hearing as a result of a serious rule violation. Id. page 2, Line 27 through Lines 28: THEREFORE, for the foregoing reasons,

the decision appealed from is AFFIRMED and this appeal is DISMISSED WITH PREJUDICE.

Ed. Page 2, Line 29 through Line 30: Columbia, S.C. October 13, 2015.

ARGUMENT

Appellant asserts the above ALJ decision October 13, 2015 was so clearly erroneous, or arbitrary, or capricious, or an abuse of discretion, in view of the substantial evidence on the whole record? The ALJ John B. McCleod dismissal of all of the claims raised by Appellant Tyrone Lamar Roberson without making a complete finding of fact on the meritorious issues raised in record, to preserved for direct appellate review, before issuing final dismissal with prejudice order October 13, 2015 without an express determination that there is no just reason for delay. This above October 13, 2015 ALJ John B. McCleod order of dismissed with prejudice in case docket No. # 15-ALJ-04-0256-AP is an extrinsic fraud upon the court perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases that are presented for adjudication? ... See S.C. Rules of Civil Procedure, Rule 60(b)(3) The rule further provides it "does not limit the power of a court to entertain an independent action to relieve a party from a judgment, order or proceeding, or to set aside a judgment for fraud upon the court?" Again, there is no specific time limit. Fraud upon the court has been defined as "that species of fraud which does, or attempts to, subvert the integrity of the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases that are presented for adjudication?" H. Lightsey, J. Flanagan, South Carolina Civil Procedure, 408 (2nd ed. 1985).

Meritorious: "[I]n considering a Rule 60(b)(3) motion the threshold matter is whether the movant has demonstrated the existence of meritorious claim or defense." Bowers v. Bowers, 304 S.C. 65, 66, 403 S.E. 2d 127, 129 (Ct. App. 1991).

If state laws or regulations contained language constraining the discretion of state officials, a liberty interest existed.

Furthermore, even as to a material fact, an issue is genuine only where the record established that the fact-finder could find, by a preponderance of the evidence, that the plaintiff is entitled to judgment in his favor.

In Swierkiewicz v. Sorema N.A., 534 U.S. 506, 122 S.Ct. 992, 152 L.Ed.2d 1 (2002), we unanimously reversed the Court of Appeals for requiring employment discrimination plaintiffs to specifically allege the elements of a prima facie case of discrimination. We explained that "the Federal Rules do not contain a heightened pleading standard for employment discrimination suits," and a "requirement of greater specificity for particular claims" must be obtained by amending the Federal Rules. *Id.*, at 515, 122 S.Ct. 992 citing Leatheman v. Tarrant County Narcotics Intelligence and Coordination Unit, 507 U.S. 163, 113 S.Ct. 1160, 122 L.Ed.2d 517.

obviously, if prison officials have knowingly acted in direct violation of a judgment against them, on contrary to the specific holding of a previously decided case in the Supreme Court or in the local state or federal courts respondents of SCDC are not entitled to qualified immunity defense for summary judgment, when prison officials acts or omission under color of law knowingly violated clearly established Federally protected constitutional rights of Appellant Tyrone Lamar Robinson, and it is always in the public interest that governmental officials act in a lawful manner. The Supreme Court has stated that declaratory judgment relief should be "conditioned by the necessities of the public interest which the constitution or statute sought to protect." The intent of the government in passing its laws is a public interest aspect which cannot be ignored. officers to take and subscribe the following oath: "I do solemnly swear (or affirm) that I am duly qualified, according to the constitution of this state, to exercise the duties of the office to which I have been elected, (or appointed), and that I will, to the best of my ability, discharge the duties thereof, and preserve, protect, and defend the constitution of this state and of the United States. So help Me God." see S.C. Constitution Article V, § 4. officers to take and subscribe oath...; see also S.C. Constitution Article V, § 5. Form of oath.

CONCLUSION

WHEREFORE, IT IS PRAYED THE COURT REVERSE THE ALD ERRONEOUS DECISION. AND REMAND THIS MATTER TO THE CIRCUIT COURT FOR A CIVIL TRIAL BY JURY TO AWARD APPELLANT COMPENSATORY MONETARY ACTUAL AND PUNITIVE DAMAGES... FOR RESPONDENTS TORTIOUS CONDUCT.

SIGNED THIS 23rd DAY OF OCTOBER 2015.

RESPECTFULLY SUBMITTED

TYNONE LAMAN ROBERTSON

TYNONE LAMAN ROBERTSON # 191327

PENNY CORRECTIONS INSTITUTION

BMU 0X22

430 OAKLAWN ROAD

PELZER, S.C. 29669

COUNSEL OF RECORD APPELLANT

cc.

South Carolina Court of Appeals

1231 GERVAIS STREET

COLUMBIA, SOUTH CAROLINA 29201;

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DESIGNATION OF MATTERS ON APPEAL

1. Grievance No. # MOC# 92-15. IMMEDIATE STEP 1 & STEP 2;
 2. ALJ NOTICE OF APPEAL CASE DOCKET No. # 15-ALJ-04-0256-AP;
 3. Motion for Declaratory Judgment for quantum meruit in case Docket No. # 15-ALJ-04-0256-AP;
 4. RESPONDENT'S BRIEF AND MOTION TO DISMISS;
 5. ALJ Honorable John D. McLeod ORDER OF DISMISSAL;
 6. PEGGY YORR SCDC Administrative Coordinator Response to inmate correspondence, and Tyone Laman Robertson's letter address to Mr. Lefford Tate, Deputy Director of Program Services.
 7. EEOC FORM 5, Charge of Discrimination Charlotte, North Carolina.
- SUBMITTED THIS 23rd DAY OF OCTOBER 2015.

RESPECTFULLY SUBMITTED

Tyone L. Robertson

Tyone Laman Robertson # 191327
Verny Connections' Institution
6M4 DX 22
430 Oaklawn Road
Pelzer, South Carolina 29689;
counsel of Record Appellant;

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SC Court of Appeals

CERTIFICATE OF SERVICE BY MAIL

Appellant Tymone Lamar Robertson hereby certifies that a copy of the foregoing Brief of Notice of Appeal by Appellant was this 23rd day of October 2015 served upon the following Respondents by placing an original copy of the same via mail to his/her last known address to be forwarded as follows:

SOUTH CAROLINA COURT OF APPEALS
1831 GERVASE STREET
COLUMBIA, SOUTH CAROLINA 29201.

RESPECTFULLY SUBMITTED
TYMONE L. ROBERTSON
TYMONE LAMAR ROBERTSON # 191327
PENNY CONNECTIONS & INSTITUTION
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COUNSEL OF RECORD APPELLANT;

cc.

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Tyrone Lamar Roberson # 191327 SC Court of Appeals
Penny Connections Institution
SMU TX 22
430 Oaklawn Road
Pelzer, South Carolina 29669

South Carolina Court of Appeals
1231 Genvais Street
Columbia, South Carolina 29201

Date: October 23, 2015

Dear Clerk

Enclosed with this letter is an original copy of Notice of Appeal, designation of matters on Appeals and Certificate of Service by mail that I need for you to please clock date stamp and to please file accordingly in my behalf. And can you please return a clock stamp copy to me at the above listed address. I would greatly appreciate your help in this regard. Thank you!

RESPECTFULLY SUBMITTED
Tyrone L. Roberson

cc

M. MR. TYNONE LAMAN ROBERSON # 191327
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RX 22
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ZEN, SOUTH CAROLINA 29669

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