

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Appeal From Anderson County
The Honorable J.C. Nicholson, Circuit Court Judge MAR 25 2016
Appellant Case No: 2013-00879

SC Court of Appeals

IN THE MATTER OF CARE AND TREATMENT OF

William Deans,

Appellant.

APPELLANTS REPLY TO RESPONDANTS RETURN TO
APPELLANTS ADDIUM IN SUPPORT OF MOTION FOR AN ORDER
CONSISTENT WITH LOWER COURTS ORDER DISMISSING THIS CASE

William Deans
7901 Farrow Rd
Bldg 3 3d floor
Columbia, SC 29203

Appellant

Other:
SC Attorney General, Alan Wilson
Assist. AG Deborah R.J. Shupe
Attorneys for Respondant

APPELLANTS REPLY TO RESPONDANTS RETURN TO APPELLANTS
ADDIUM IN SUPPORT OF MOTION FOR AN ORDER CONSISTENT WITH THE LOWER COURTS
ORDER DISMISSING THIS CASE

On 2/15/2016 Appellant received Respondants Mar. 11, 2016 Return (letter) still claiming the case is closed / but that the SC Dept. Mental Health can continue on the case through SC Code of Law 44-48-110 on the SCDMH own authority, under the dismissed case No: 2002-CP-04-3343 and apparently the way the case was continued after the standing order of dismissal dated Nov. 31, 2002 through the SCDMH as the movent, with no where in SCC Ann. 44-48-10/170 did it permit this. This Court has failed to understand that the State is not the movant / but the SCDMH has been all along, with the Respondant defending defacto defective pleadings.

Appellant has filed document after document in this Court showing un-questionably #1. the case has been closed since Nov. 31, 2002 and as a matter of law this Court should order Appellants release / because the lower Court can not take any further action on 2002-CP-04-3343 and being on Supersedeas / which in turn is why Appellant seeks release through this present motion.

See Appellants Exhibits A-J, specifically A-C, support Appellant 100%, whereby the Respondant has not produced not one authority to show entitlement.

In Appellants Exhibits A-J, two clerks of court, being, Cathy Philps, Richard Shirley and three Judges, Nicholson, Maddox and Stilwell and Respondants Mar. 11, 2016 letter attest the case is closed: As proven again with the letter of Clerk of Court, Mr. Shirley, see letter dated Feb. 18, 2016 saying Appellant (Deans) can not file any pleadings because the case is closed, (Deans has been granted to proceed Pro-Se).

The one most disturbing fact of this case is Respondants have yet to prove or even show how jurisdictionally any pleading being trials and annual reviews to this point on appeal past the date of Nov. 31, 2002 are not defacto defective pleadings / orders.

Which in turn is the question before the Court #1. Is Appellant being held un-lawfully past the date of Nov. 31, 2002.

#2. Should this Court order Appellants release.

Mar. 17, 2016

Respectfully submitted by,

William Deans
William Deans
7901 Farrow Rd, Bldg 3 3d floor
Columbia, SC 29203

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William Deans,

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PROOF OF SERVICE

I certify I have served "Appellants Reply To Respondants Return To Appellants Addium In Support Of Motion For An Order Consistent With The Lower Courts Order Dismissing This Case",
on Respondant on appeal, Alan Wilson, to the attention of Assist. AG Deborah R.J. Shupe, by depositing a copy of it in the United States Mail, postage pre-paid, on 3-17 2016, addressed to (Respondant) PO Box 11549, Columbia, SC 29211.

William Deans

William Deans

7901 Farrow Rd.

Bldg 3 3d floor

Columbia, SC 29203

note: Clerk's office USPS #

1315-0080-0000-1796-0580

3/17/2016

To: The Honorable Abbott Kitchings, Clerk
South Carolina Court Of Appeals
PO Box 11629
Columbia, SC 29211

In The Matter Of Care And Treatment Of
William Deans, Appellant
Appellant Case No: 2013-00879

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MAR 25 2016

SC Court of Appeals

Dear, Mr. Kitchings,

Please find enclosed for filing,

1. Appellants Reply To Resondants Return To Motion.

AND Please, return Appellants copy in the provided envelope.

Sincerely,

William Deans

William Deans
7901 Farrow Rd
Bldg 3 3d floor
Columbia, SC 29203

Note:

I have not received my copy of my last filing?

William Downs
7901 FARROW RD
Bldg 3 3d Floor
Columbia, SC 29203

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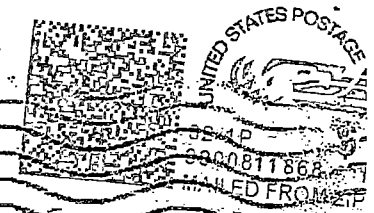


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NOTE: To file a claim for damage or loss of contents, the article, container, and packaging must be presented.

COLUMBIA SC 292

MAR 10 2016 AM



The Honorable ABBOTT K. Tinkins
Clerk, SC ~~SC~~ Court of Appeals
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals