

COMPLAINT OF COURT REPORTERS OMISSION
OF STATEMENT BY JUDGE DENNIS

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In The Court of Appeals
[In The Supreme Court]

APR 22 2016

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Circuit Court Judge

Case No. 2015-001331

Medical University
of South Carolina

Respondent,

v.

Jack Powell,

Appellant.

COMPLAINT OF COURT REPORTER

Appellant hereby submits Court Reporter Ruth Mott has made multiple mistakes concerning the Transcript for the Respondents Motion for Summary Judgment that was heard on July 30th 2015.

1. A vital statement was omitted by Judge Dennis in the transcript, which was I'm granting Summary Judgment because you didn't respond to the Memorandum, just after Appellant stated he had zero Discovery so far in this case and Defendant has entered an inflammatory statement in their MSJ.

On p.14, L.18-21 is where Judge Dennis questioned Appellant if he responded to the Motion for Summary Judgment.

On p.15, L. 1-19 is where Judge Dennis states the procedure for Summary Judgment because of Appellants failure to respond the Memorandum in Support for MSJ.

When they file it they base it on certain things such as deposition which he cited and other matters which has been part of the record and filed to support his motion for summary judgment. Then Judge Dennis states "I don't have anything that contradicts it by way of affidavit" which was referencing Appellants failure to respond and again Judge Dennis's explanation of why he granted Summary Judgment.

On p.9, L. 3-7 is where Judge Dennis stated Defendants Attorney could rely on the positions stated in his Memorandum.

On p.1, 3rd para. of Appellants Motion to Amend Reconsideration is where Appellant referenced Judge Dennis stating he's granting Summary Judgment because Appellant didn't respond the Memorandum.

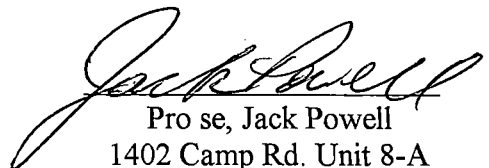
On p. 1, 3rd para. of Appellants Motion to Recuse Judge Dennis where it states the circumstances in another case where Judge Dennis explained that the response to the Memorandum was no big deal just the same issues.

2. On P.12, L.18, 20 & 23 where reporter makes another mistake and documents that it is Mr. Powell speaking but it is actually the Respondent Attorney John "Jay" Jones.

3. On P. 2-6 are pages in the transcript of other cases which Appellant was improperly charged.

Therefore it is vital that the Reporter properly include Judge Dennis's actual statement of granting Summary Judgment because Appellant did not respond, which has a bearing on this Appeal and another case where Judge Dennis stated in a meeting with Knology Attorney, that responding to the Memorandum in Support of Summary Judgment was no big deal but just going over the same issues, which turned out to be not true in both cases.

April 20th, 2016


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