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JUL 18 2016

SC SUPREME COURT

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Clifton Newman, Circuit Court Judge  
Civil Action No. 2015-CP-40-02011

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Appellate Case No. 2015-02177

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Dennis M. Gallipeau,

Petitioner,

v.

Carnaby Square Horizontal Property Regime; Stephanie Carol Trotter;  
D. Ryan McCabe; McCabe, Trotter, Gambrell & Beverly, P.C.; Rogers,  
Townsend & Thomas, P.C.; McCabe, Trotter & Beverly, P.C.; and John  
And Jane Doe(s),

Respondents.

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REPLY OF PETITIONER

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Dennis M. Gallipeau, pro se  
1920 Ashford Lane  
Columbia, SC 29210  
(803) 764-1718

The two groups of Respondents, Stephanie Carol Trotter (who is both a named defendant in the lower court case and the attorney for the very defendants she stands accused of conspiring with in that case; Carnaby Square; McCabe Trotter Gambrell & Beverly; and McCabe Trotter & Beverly); D. Ryan McCabe; and Roger Townsend & Thomas, PC, along with Respondents McCabe Trotter & Beverly; and McCabe Trotter Gambrell & Beverly, have each filed separate returns presenting verbatim “arguments.” Accordingly, petitioner replies to both returns here and now.

#### Argument

Rule 242(f) SCACR states, in pertinent part, that:

The return shall include an argument on each question and may include a counter-statement of the case and the questions presented for review.

Despite Rule 242(f), not one of the three questions presented for review by petitioner was addressed by the respondents in their returns. Instead, they jointly attacked the petition on purely procedural grounds and, with but one insignificant difference, the two returns are identical to one another.

Respondents launch their attack on the petition by complaining about what was or what they allege was not before the Court of Appeals in a proceeding they themselves declined to participate in. They then go on to characterize the constitutional right granted all citizens to petition their government for a redress of grievances as a “frivolous” one, and completely ignore the one argument petitioner makes in his petition.

The primary deficiency with respondents “argument” is that it overlooks one very key factor, that the Court of Appeals has no authority whatsoever to overrule a decision of this Court, be it *Ex parte Martin* or any other case decided by this Court. Instead, it is duty bound to

follow the decisions and rulings of this Court, and the only court that has the power and authority to revisit and hopefully set aside the *Martin* decision, is this Court, the court that rendered that decision, the supreme court of this once great state.

And while it is quite obvious why the respondents are scared to death at the prospect of the Court of Appeals reviewing what transpired in Judge Newman's courtroom and the decisions he made that sad day for all South Carolinians, the fact remains that only this Court has the authority to set *Martin* aside and devise some other solution to "the increasing number of persons seeking to proceed in forma pauperis" other than the "guidance" offered by the *Martin* court which ignored and did great damage to our state constitution by locking the courthouse doors to every citizen of this state on the sole basis of his or her ability to pay a court's filing fee. And it is equally clear that respondents will do anything and in the case of the attorney for Respondents Trotter; McCabe; and Rogers Townsend, will say anything to achieve their goal of keeping this Court from acting on the petition now before it.

With the Court's indulgence, a little more needs to be said. About the Return filed by Ms Trotter; Mr McCabe; and Rogers Townsend. Seemingly operating under the belief that he is writing for the court, attorney Wood's repeated attempt to maliciously malign your petitioner brings to mind lyrics from an old Eagles tune:

We can do the innuendo  
We can dance and sing  
When its said and done  
We haven't told you a thing  
We all know that Crap is King  
Give us dirty laundry<sup>1</sup>

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<sup>1</sup> Lyrics by Don Henley, "Dirty Laundry." It comes as no surprise that a search of his name, both state and federal courts, reveals numerous traffic court cases, multiple lawsuits challenging his firm's unethical and unlawful debt collection practices and, hardly surprising, even a divorce proceeding. Attorney Robert P Woods, it seems, would

## Conclusion

Petitioner Dennis M. Gallipeau's petition is properly before this Court. It presents questions of overwhelming importance and significance to the citizens of South Carolina.

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feel more at home in a pig sty than a court of law. And his complaints about not receiving petitioner's filings would be better directed to his staff.

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PROOF OF SERVICE

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I certify that I have served all counsel of record in this action with a copy of the Reply by U.S. Mail, First Class, postage prepaid, on this **18th day of July, 2016**.

  
Dennis M. Gallipeau