

RECEIVED

JUL 25 2016

THE STATE OF SOUTH CAROLINA
In the Supreme Court

S.C. SUPREME COURT

CERTIORARI TO THE COURT OF APPEALS
Appeal from Spartanburg County
The Honorable J. Derham Cole, Post-Conviction Relief Judge

Opinion No. 5372 (S.C. Ct. App. Filed December 30, 2015)

Appellate Case 2016-000610

Farid A. Mangal,

Respondent,

v.

State of South Carolina,

Petitioner.

RETURN TO MOTION OF SC NETWORK OF CHILDREN'S ADVOCACY
CENTERS AND USC CHILDREN'S LAW CENTER TO PARTICIPATE
AS AMICI CURIAE

JRZ
P.1

The undersigned counsel for the Respondent asks that the record show his opposition to the motion of the S.C. Network of Children's Advocacy Centers and the USC Children's Law Center to participate in this case as amici curiae. Before the Court rules on the motion, the undersigned asks as a matter of fundamental fairness that the Court require the movants to disclose in detail to the Court and to the undersigned their relationship with Petitioner and the existing amicus curiae and their contacts with the Petitioner and the existing amicus curiae concerning this case.

The Petitioner and the S.C. Solicitors' Association should also be required to disclose in detail their

communications with each other (written, electronic, oral etc.) concerning the latter's participation in this case.

The Petitioner already has one alter ego in this case, and it degrades the Respondents' right to due process if Petitioner is coordinating its efforts with other parties to enable the Petitioner to circumvent the ban on introducing new arguments not presented to the circuit court. The undersigned reserves the right to expand this Return after the movants and Petitioner have provided the information sought.



John R. Ferguson
Counsel for the Respondent
S.C. Bar No. 1987
P.O. Box 286
Laurens, S.C. 29360
(864) 984-2126

July 20, 2016

JR7
P.2

RECEIVED

JUL 25 2016

THE STATE OF SOUTH CAROLINA
In the Supreme Court

S.C. SUPREME COURT

CERTIORARI TO THE COURT OF APPEALS
Appeal from Spartanburg County
The Honorable J. Derham Cole, Post-Conviction Relief Judge

Opinion No. 5372 (S.C. Ct. App. Filed December 30, 2015)

Appellate Case 2016-000610

Farid A. Mangal,

Respondent,

v.

State of South Carolina,

Petitioner.

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at Cox Ferguson and Wham LLC and that on the 20 day of July, 2016 she served the Return to Motion of Children's Law Center and USC Children's Law Center herein by depositing a copy of it in the United States Mail, postage prepaid and addressed to:

Alicia A. Olive, Esq.
Asst. Attorney General
P.O. Box 11549
Columbia, SC 29211-1549

Barry J. Barnette, Esq.
Solicitor's Assoc. Of SC
P.O. Box 11251
Columbia, SC 29211-1251

Suzanne B. Cole, Esq.
100 Washington Place
Spartanburg, SC 29302

Candice A. Lively, Esq.
1600 Hampton St., Ste. 502
Columbia, SC 29208.

Ouliorah & Ball

July 20, 2016