

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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AUG 15 2016  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge  
Case No. 2014CP1007706

North Charleston Police Department, and Sergeant Thomas Deckard  
Respondent,

v.

Terrell L. McCoy

Appellant.

[INITIAL] BRIEF OF APPELLANT

Terrell McCoy  
BRCI Marion # ~~219~~ 219  
4460 Broad River Rd  
Columbia, SC 29210

JAM JAGEL

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## Arguments

1. Did the Court erred by ruling that Appellant's civil action was untimely and barred by the three year statute of limitation provided under the South Carolina Tort Act?

2. Does S.C. Code Ann. § 15-78-70(b) Render Inapplicable the statute of limitation found in § 15-78-110

Conclusion .....

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Proof of SERVICE SC Court of Appeals

I, Terrell McCoy, hereby declares, that on August 10, 2016, I personally placed a handwritten copy of the Appellant's heading for initial brief and table of Contents inside a prepaid stamp envelope to be mail by US Postal Service to the following address.

South Carolina Court of Appeals  
Jenny ABBOTT Kitching  
1220 Senate street  
Columbia, SC 29201

1/1 Terrell McCoy

JAN 10 2016

Terrell McCoy, 256070  
BRCI Marion # 219  
4460 Broad River Rd  
Columbia, SC 29210

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SC Court of Appeals

August 10, 2016

South Carolina Court of Appeals  
Jenny Abbot Kitchings  
1220 Senate Street  
Columbia, SC 29201

RE: Terrell McCoy v. NCPD, Sergeant Thomas Deckard  
Appellate Case No. 2016-000650

Dear Ms. Kitchings,

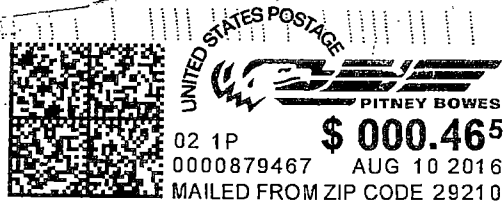
Enclosed please find a copy of the Appellant's  
Heading for Initial Brief and Table of Contents in <sup>connection</sup> ~~reference~~ to  
the above reference case. I have also enclosed a proof of service  
as evidence of service upon.

cc. Robin Jackson

Terrell McCoy/sf

LEGAL MAIL

Terrell McCoy, 256070  
BRCI Marion # 219  
4460 Broad River Rd  
Columbia, SC 29210



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South Carolina Court of Appeals  
Jenny Abbot Kitchings  
1220 Senate Street  
Columbia, SC 29201



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 CENSOR THIS ITEM; THEREFORE, THE DEPARTMENT  
 DOES NOT ASSUME RESPONSIBILITY FOR ITS CONTENTS.  
 BROADRIVER CORRECTIONAL INSTITUTION  
 S.C. DEPARTMENT OF CORRECTIONS