

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM FLORENCE COUNTY

Court of Common Pleas

Honorable D. Craig Brown, Circuit Court Judge

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Case No: 2015-002449

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Mansy McNeil.....Appellant

v.

Mark Keel, Director of the South Carolina Law Enforcement Division (SLED) and the State of  
South Carolina .....Respondents

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FINAL BRIEF OF APPELLANT

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Charles T. Brooks, III, S.C. Bar # 11762  
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The Appellant maintains that the equitable relief he seeks should proceed to trial on the disputed facts and that the granting of the Motion for Judgment on the pleadings was improper by the Trial Court.

### CONCLUSION

For all of the foregoing reasons, the Order Granting Judgment on the Pleadings of the Trial Court should be reversed and/or remanded for a full hearing on the disputed issues, and for the granting of any other remedy that is just and proper in this case.

RESPECTFULLY SUBMITTED,



Charles T. Brooks, III, S.C. Bar # 11762  
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August 9, 2016

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PROOF OF SERVICE

I do hereby certify that I have this 12th day of August 2016, served a copy of the **FINAL BRIEF OF APPELLANT** and a **PROOF OF SERVICE**, on Mark Keel, Director of the South Carolina Law Enforcement Division (SLED) by personally depositing a copy of it in the United States Mail, postage prepaid, on August 12, 2016, addressed to his attorney of record, Adam L. Whitsett, Post Office Box 21398, Columbia, South Carolina 29221-1398 and on The State of South Carolina by personally depositing a copy of it in the United States Mail, postage prepaid, on August 12, 2016, addressed to their attorney of record, T. Parkin C. Hunter, Office of South Carolina Attorney General, Post Office Box 11549, Columbia, South Carolina 29211



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August 12, 2016