

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas

The Honorable J. Mark Hayes, II, Circuit Court Judge

RECEIVED

OCT 24 2016

Case No. 2016-001751

SC Court of Appeals

81350

Lisa Randolph.....Appellant

v.

Dolgencorp, LLC, d/b/a Dollar General Store #76751,
a/k/a Dollar General, and Cherokee County, and Blacksburg
Police Department, Defendants, Of Whom Dolgencorp, LLC,
d/b/a Dollar General Store #76751, a/k/a Dollar General is the..... Respondent.

**APPEALANT'S MOTION TO DENY RESPONDENT'S MOTION
TO DIMISS APPEAL OR, ALTERNATIVELY, TO
TO STAY APPELLATE PROCEEDINGS**

The Appellant, Lisa Randolph hereby moves this Honorable Court of Appeals to Deny the Respondent's Motion to Dismiss Appeal or, alternately, to Stay Appellate Proceedings for the reasons set forth below:

The Honorable J. Mark Hayes, II has signed the Order dated July 25, 2016 and in his Conclusion states that the Court grants Dollar General Motion for Summary Judgement

as to all of the Plaintiff's claims and dismissing Plaintiff's claims and Complaint with Prejudice.

IT IS SO ORDERED.

The Appellant filed a Motion for Reconsideration On June 30, 2016. The Appellant sent a copy to The Honorable J. Mark Hayes, II, on July 5, 2016 and the Motion for Reconsideration was ignored by the Honorable J. Mark Hayes, II since the Order was dated and signed on July 25, 2016 and done so with PREJUDICE draws to the Conclusion that The Honorable J. Mark Hayes, II, has no intentions of hearing or considering the Appellant's Motion for Reconsideration since the Appellant is a Pro Se litigant.

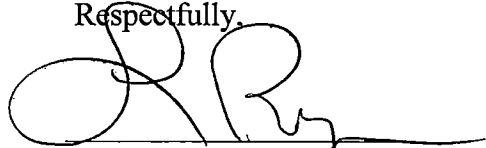
Enclosed please find the Circuit Court's Roster saying the case had ended.

The appellant filed the appeal within 30 days of the Order because Appellant did not want to get caught up in the catch 22 not filing appeal on time even though the appellant filed a Motion for Reconsideration.

South Carolina is a fact pleading state and in Appellant's initial complaint was based on facts with evidence to back up the Appellant's Pleadings. South Carolina states **RULE 8 (a) 1**) a short and plain statement of the grounds including facts and statutes upon which the court's jurisdiction depends, unless the court already has jurisdiction to support it. The Honorable J. Mark Hayes, II, has shown bias toward a Fortune 500 company and not allowed the pro se a right to be heard by a Jury trial of her peers.

October 20, 2016
October 19, 2016

Respectfully,

A handwritten signature in black ink, consisting of stylized, overlapping letters that appear to be 'LR' followed by a horizontal line extending to the right.

Lisa Randolph, Pro Se
203 West Carolina Street
Blacksburg, South Carolina 29702
lbrandolph@att.net

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a/k/a Dollar General, and Cherokee County, and Blacksburg
Police Department, Defendants, Of Whom Dolgencorp, LLC,
d/b/a Dollar General Store #76751, a/k/a Dollar General is the..... Respondent.

CERTIFICATE OF SERVICE

I do here by certify that on October 20, 2016 that a copy of the
APPEALANT'S MOTION TO DENY RESPONDENT'S MOTION
TO DIMISS APPEAL OR, ALTERNATIVELY, TO STAY APPELLATE
PROCEEDINGS was served by depositing a copy into the U.S. mail addressed
to:

Lee Ellen Bagley
Gaffney Lewis & Edwards, LLC
3700 Forest Drive, Suite 400
Columbia, South Carolina 29204

Ms. Rosalyn W. Frierson
Director Office of Court Administration
Calhoun Building
1015 Sumter Street, Suite 200
Columbia, South Carolina 29201-3739

October 20, 2016
October 20, 2016

Respectfully,

A handwritten signature in black ink, appearing to read 'LR', with a long horizontal flourish extending to the right.

Lisa Randolph, Pro Se
203 West Carolina Street
Blacksburg, South Carolina 29702
lbrandolph@att.net

Lisa Randolph
203 W Carolina St
Blacksburg, South Carolina 29702
October 20, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court Of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

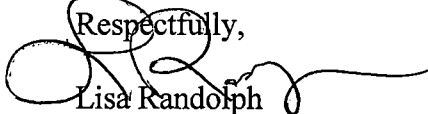
Re: Lisa Randolph v. Dolgencorp, LLC d/b/a Dollar General Store #76751, aka Dollar General, and Cherokee County, and Blacksburg Police Department, Defendants,

Of whom Dolgencorp, LLC d/b/a Dollar General Store #76751, a/k/a Dollar General is the Respondent.

Appellate Case Number: 2016-001751

Dear Ms.Kitchings,

Enclosed for filing is the original and seven (7) copies of Lisa Randolph's Appellant's Motion To DENY Respondent's Motion To Dismiss Appeal Or, Alternately, To Stay Appellant's Proceedings. Please file the original and sent a stamped copy that is supplied in the self-addressed envelope.

Respectfully,

Lisa Randolph

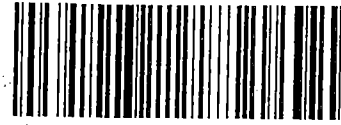
cc: Lee Ellen Bagley
Gaffney Lewis & Edwards
3700 Forest Drive, Suite 400
Columbia, South Carolina 29204

Ms. Rosalyn W. Frierson,
Director Office of Court Administration
Calhoun Building
1015 Sumter Street, Suite 200
Columbia, South Carolina 29201-3739

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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

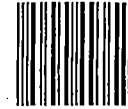
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Lisa Randolph

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SC Court of Appeals

The Honorable Jenny Kitchings

Clerk Of Court

South Carolina Court of Appeals

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