

In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY

Circuit Court

Judge Kristi Lea Harrington, Judge

Appellate Case No. 2014-002776

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DEC 01 2016

SC Court of Appeals

STATE OF SOUTH CAROLINA

Respondent,

Vs.

LouShonda Myers,

In Propria Persona, Sui Juris.

RESPONSE TO RESPONDENT'S MOTION TO COMPEL

I, LouShonda Myers, now responds to the Respondent's motion to compel filing of complete record on appeal.

It has come to my attention that the Respondent's have alleged that several items were not submitted in the record on appeal. While these items were in fact left out of the record on appeal, it was in an inadvertent mistake. The Respondent also alleged that I failed to number each page consecutively, the only pages that were not numbered were the pages of the transcript- which are already numbered.

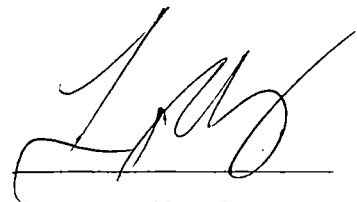
It is my position that compelling me to file a new record on appeal will in fact cause an undue burden and expense. I have already filed numerous affidavits in this matter as to my financial status and the inability to afford the costs associated with this appeal. Therefore, if it is the court's position that a new set of Record on Appeal is needed, I am petitioning that the court

order assistance from the South Carolina Commission on Indigent Defense to assist in this matter.

It is of no doubt that I have adhered to the rules in this matter, and my only obstacles in this matter are financial- the lack thereof cannot be grounds and/or used against me in order to dismiss this matter. It would not be in the best interest of justice.

Therefore, I am respectfully demanding that an order be made so that assistance may be received from the South Carolina Commission on Indigent Defense, and that the submission of a new Record on Appeal, if ordered; and the Final Brief be stayed until as such time as the Record may be compiled and submitted.

November 26, 2016.



LouShonda Myers

In Propria Persona, Sui Juris Petitioner

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CERTIFICATE OF SERVICE

I, LouShonda Myers, certify that a copy of the foregoing was served in the following manner:

V. Henry Gunter, Jr./Alan Wilson

Attorney for Respondent

P.O. Box 11549, Columbia

South Carolina 29211

November 26, 2016.



LouShonda Myers

In Propria Persona, Sui Juris Petitioner

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