

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Judge L. Casey Manning, Fifth Judicial Circuit

Case No:2016-CP-001239

Biafra Monique Curtis,

Appellant

v.

South Carolina Department of Public Safety,
Warren Ganjehsani, Mike Oliver, Leroy Smith,
Kenneth Phelps, Anthony Grice, William Taylor,
Nicklous King, Willie McCauley, Jr., Ada Schmidt,
Aaron Canzater and Cherie Young, individually
and in their official capacities, et al.,

Respondent(s)

RECEIVED

JAN 11 2017

SC Court of Appeals

**APPELLANTS RESPONSE AND OBJECTION TO RESPONDENT'S OBJECTION AND
MOTION TO COMPEL APPELLANT TO CONFORM TO RULE 211 (b)**

YOU WILL PLEASE TAKE NOTICE, APPELLANT, hereby files a formal objection to the respondents by and through their attorney's motion to compel appellant to conform "Appellant's Final Reply Brief" to Rule 211(b) which was filed with the SC Court of Appeals on January 3, 2017. Appellant also hereby begs of the court to remand the case over for a jury trial as requested in the Initial Civil Action Cover sheet and again on the final signature page number 44 of the original Complaint. Due to the fact that the respondents have failed to submit their final brief, but rather, have elected to repeatedly file motions to distract the Court's attention from the Ultimate Facts that have been Established as matters of record, provided from valid sources and attached hereto for clarity. The respondents attorneys have refused to address on a point-by-point basis or any other method the true elements of the case with the exception of their denial the acts and omissions of the respondents document, titled "RESPONSES AND OBJECTIONS TO

PLAINTIFF'S DISCOVERY REQUESTS MISCHARACTERIZED AS MOTION FOR DISCOVERY" (EXHIBIT "4" pg 4 #7), which were later revealed to be misrepresentations of truth when valid documentation was provided which exposed these mistruths when the Appellant provided the actual letters from Chief K.D. Phelps of the Office of Professional Responsibility assuring the Appellant that an investigation would be done, dated June 5, 2015 (EXHIBIT "2") and five days later, Appellant received letter from General Counsel, Warren Ganjehsani, dated June 10 2015, where he refused to allow the investigation into the complaints (EXHIBIT "3"), thereby violating the Appellants right to due process and (EXHIBIT "6")SLED Letter from Captain John T. Bishop, dated May 29, 2015 and required statues of law, Section 1 Article 3, Chapter 6, Title 23 of the 1976 Code H. 3158 (EXHIBIT "5") Lines 22-33) and failing to adhere to the CALEA Law Enforcement Accreditation Standards (EXHIBIT "10" Pgs 3-36). It is the opinion of this writer that the respondent's attorneys have no basis of a defense and are merely grasping for straws to have a ruling for dismissal in their favor based every possible issue except for defending the elements of why this case and ended up in this court. This statement is based on the fact that they have repeatedly attempted to have valid and relevant matter and supporting documents stricken from the record under the ruse of using court procedure as allegations of failure to adhere to court rules as grounds for removal rather than providing any hint of an actual defense to the allegations contained in the complaint. Plainly stated, they are counting on their requested motions to have the elements of factual documentation of the case dismissed by technicalities rather than actually providing a defense to establish the accusations to not be true and accurate. It is also the opinion of this writer that submitting these knowingly false misrepresentations, in writing, represents attempted "fraud on the court" and by sending them to the appellant by use of the United States Postal System is "mail fraud". The appellant the self-represented is aware of the respondent's attorney's intent to abuse her obvious disadvantages since there is no evidence that the Appellant is educated, knowledgeable, or crafty in the "crafts" of "Word-Smithing" or "Spin-Doctoring" utilized in improper procedures of Administrative or Judicial Remedys. GIDEON v. WAINRIGHT, 372 U.S. 335 , " A state cannot , by invoking the power to regulate the professional conduct of an attorney or, in this case, self-represented individual, infringe in any way on the right of individuals and the public to be fairly represented in lawsuits authorized by Congress to effectuate a basic public interest, laymen cannot be

expected to know how to protect their rights when dealing with practiced and careful adversaries." Please see: SC Code: 16-17-735 and again refer to (EXHIBIT "4" pg 4 #7)

- **Persons knowingly presenting documents in connection with a sham legal process may be subject to criminal prosecution, not only under the Federal Mail Fraud Statute, but also under SC Sham Legal Documents Statute (Sect. 16-17-735), and such action may amount to obstruction of justice if they purport to prevent a South Carolina Court from exercising its jurisdiction.**
- ***Sect. 16-17-735(D): It is unlawful for a person falsely to assert authority of law, in an attempt to intimidate or hinder a state or local official or employee or law enforcement officer in the discharge of official duties, by means of threats, harassment, physical abuse, or use of a sham legal process. A person violating this subsection is guilty of a felony and, upon conviction, must be fined not more than ten thousand dollars or imprisoned not less than one year and not more than three years, or both.***

In direct response to this Motion, filed by the respondent's Attorney's, as the Appellant has read and interpreted Rule 211(b)(1) to state with the bold, underlined statement more specifically applying to the documents that the Appellant submitted:

**RULE 211
FINAL BRIEFS**

(a) Time to Serve and File. Within twenty (20) days after the service of the Record on Appeal, each party shall serve a copy of his final brief(s) on every other party to the appeal, and file fifteen (15) copies of the final brief(s) with the clerk of the appellate court. As provided by Rule 267(d), one copy filed with the appellate court shall be filed unbound. The party must also file with the clerk proof that the final brief(s) has been served, and a certificate that his final brief(s) complies with Rule 211(b). The appellate court may require a party to file additional copies of its brief(s).

(b) Content. The final brief(s) shall be identical to the brief(s) previously served under Rule 208, except for the following:

(1) References to the Record. The references in the initial brief shall be revised to indicate where the material appears in the Record on Appeal. **These revised references may be in place of or in addition to the initial references**, and shall be in the form indicated by the following examples: (R. p. 15, line 4) (R. p. 75, lines 8-20) (R. p. 90, line 1-p. 101, line 14) (R. pp. 29-31).

(2) Correction of Typographical Errors and Misspellings. The party may correct obvious typographical errors and misspellings which were contained in the initial brief. No other changes may be made.

Last amended by Order dated January 29, 2009, effective April 29, 2009, by Order of the same date.

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With that said, and considering the fact that the defense attorney's motion, filed on November 28, 2016, requesting a "stay of time" was never granted and the Appellant upheld her duties and submitted her final reply brief within the required time frame, but the respondent's attorney's have failed to do so as of the date of this document, the Appellant believes that this too, supports her request and again, begs of the court to remand the case over for a jury trial as requested in the Initial Civil Action cover sheet and again on the final signature page number 44 of the original Complaint. Plainly stated, The Ultimate Facts have been established by the Appellant.

The bottom line is that the Appellant has repeatedly provided valid documentation to establish that her civil rights and right to due process were denied by those who had duties to protect those established rights:

1. DID THE TRIAL COURT ERR BY DISMISSING THE CASE IN ITS ENTIRITY AND NOT ADDRESSING ALL OF THE ELEMENTS IN THE COMPLAINT, THEREFORE OVERLOOKING KEY ELEMENTS THAT REPRESENTED ACTIONS THAT ARE STILL SO TRIABLE AND WERE INDEED FILED IN SAID COMPLAINT WELL WITHIN THE STATUE OF LIMITATIONS?

Answer: Yes. Case was dismissed prematurely without addressing key elements of the complaint under the ruse that the entire case was outside of statute of limitations. Please see:

- Original Complaint, Pg 19 #27 (**EXHIBIT "1"**)
- *****PLEASE NOTE:** The Appellant holds that these occurrences are independent of others, and not merely an outgrowth of another traditional tort, the six-year limitation period of § 15-3-530 (5) is controlling and the limitation has not run.
- SECTION 15-3-40. Time for Commencement of Action. Exceptions as to persons under disability.

- (SEE ATTACHED PROOF OF DISABILITY (**EXHIBIT "9"**) NOTICE OF DISABILITY Dated February 4, 2013 with reference to the dismissal of this case in the SC Court of Common Pleas due to Statute of Limitations. Accordingly, per Title 15-Civil Remedies and Procedures, CHAPTER 3, Limitation of Civil Actions, ARTICLE 1, SECTION 15-3-20. General rule as to the time for commencement. SECTION 15-3-40 Exceptions as to persons under disability.

A. DID THE APPELLANT HAVE A RIGHT TO AN INVESTIGATION INTO COMPLAINTS SUBMITTED TO THE OFFICE OF PROFESSIONAL LIABILITY?

Answer: Yes. Please see:

- Section 1 Article 3, Chapter 6, Title 23 of the 1976 Code H. 3158 Lines 19-20, 28-39 SC Section 23-6-175 Lines 11-34, 28-39 (**EXHIBIT "23"**)
- CALEA Law Enforcement Accreditation Standards (**EXHIBIT "10" Pgs 3-36**)

B. WERE THERE LAWS IN PLACE AT THE TIME OF THE OCCURRENCE OF SAID VIOLATIONS?

Answer: Yes. Please see:

- Section 1 Article 3, Chapter 6, Title 23 of the 1976 Code H. 3158(**EXHIBIT "6"**) Lines 19-20, 28-39
- SCDPS Code of Ethics (**EXHIBIT "12"**)
- SC Constitution Article III Section 26 Oath of Office (**EXHIBIT "13"**) Pg 2
- CALEA Law Enforcement Accreditation standard 52.1.1 (**EXHIBIT "14"**)

C. WAS THE APPELLANT DAMAGED BY THESE "OCCURENCES"?

Answer: Yes. Please see:

- Letter from Georgia Outreach Mental Health (**EXHIBIT "24"**)
- Specific damages, i.e. medical bills, etc. to be provided at trial since they are continuously accruing daily
- Transcripts from May 18, 2016 Hearing (**EXHIBIT "25"**) Pg 6 Lines 6-9 (Respondent's acknowledging by and through their Attorney's that they were and are aware that the Appellant suffered serious injuries, AND Pg 12 Lines 13-15)

which is still continuing and exacerbated by this drawn out legal process of the damaged party having to fight to defend her rights, which have already been proven to have been violated, and consistently being challenged to have case dismissed on technicalities, rather than by facts)

D. WAS THE COMPLAINT TIME BARRED BY THE STATUE OF LIMITATIONS
IN THE SC TORT CLAIM'S ACT?

- **Answer:** No. ***PLEASE NOTE: The Appellant holds that these occurrences are independent of others, and not merely an outgrowth of another traditional tort, the six-year limitation period of § 15-3-530 (5) is controlling and the limitation has not run.
- Letter from Chief K.D. Phelps, dated June 5, 2015 (**EXHIBIT "2"**)
- Letter from General Counsel Warren Ganjehsani, dated June 10, 2015 (**EXHIBIT "3"**)
- Original Complaint PG 19, #27 FILED August 24, 2015 (**EXHIBIT "1"**)
- CALEA Law Enforcement Accreditation Standards Pgs 3-36 (**EXHIBIT "10"**)
- SECTION 15-3-40. Time for Commencement of Action. Exceptions as to persons under disability. The Appellant became disabled immediately, but it was documented officially in February 2013. (**EXHIBIT "9"**) Disability Documentation

E. ARE INDIVIDUAL DEFENDANTS IMMUNE FROM SUIT UNDER THE SC
TORT CLAIMS ACT?

Answer: No. As outlined by the Supreme Court in *Harlow v. Fitzgerald*, 457 U.S. 800 (1982),^[1] qualified immunity is designed to shield government officials from actions "insofar as their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known."

In 2001, the Supreme Court in *Saucier v. Katz* established a rigid order in which courts must decide the merits of a defendant's qualified immunity defense. First, the court determines whether the complaint states a constitutional violation. If so, the next sequential step is to determine whether the right at issue was clearly established at the time of the official's conduct. Also, Please see:

- SC Code Ann. 15-78-30 "Agency & Claim
- SC Code Ann. 15-70-40 Tort Liability
- SC Code Ann. 15-78-70 Liability
- SC Code Ann. 16-17-410 Conspiracy

- SC Code Ann. 15-78-50 Negligence
- SC Code Ann. 15-78-50 Right of Injured Party to File Claim to Recover Damages
- SC Code Ann. 17-28-350 Unlawful Conduct
- SC Code Ann. 15-78-10 Tort Claims Act
- SC Code Ann. SECTION 8-1-80. Misconduct, habitual negligence and the like of public officer
- South Carolina Department of Public Safety
Disciplinary Action Policy

I.PURPOSE

All employees of the Department of Public Safety are expected to conduct themselves in accordance with applicable laws, regulations, Agency Policies and generally acceptable work behaviors. Employees in supervisory positions will set an example by their conduct, attitude and work habits. This policy is created to ensure that disciplinary actions imposed by the Agency for unacceptable conduct are imposed in a consistent and fair manner and generally follow a progressive disciplinary plan. However, because it can be difficult to be all-inclusive or to assign a degree of severity to various offenses, the appropriate discipline will be determined after the particular circumstances of the case have been carefully considered. For these reasons, all supervisors will consult the Agency's Office of Human Resources prior to imposing any discipline or attempting to resolve any disciplinary matter. Employees should not construe any recommended actions contained herein to be a definitive course of action that the Agency will strictly follow when administering discipline. The Agency reserves the right to impose any type of disciplinary action for any offense as deems appropriate, including dismissal from employment for a first offense.

- II.GUIDELINES FOR PROGRESSIVE DISCIPLINARY ACTION
Violations Applicable to ALL:

- **Policy and Procedure Violations and/or Knowledge thereof:**
- 1. Destruction, Alteration or **Falsification of Records** (Level II Reprimand to Dismissal)
- 2. Interference with Other Employee's Work/ Co-conspiracy to conceal acts and omissions (Level II Reprimand)
- 3. Mishandling of Agency Funds or Documents- Spoilation of Evidence, Failure to Preserve Evidence (Level II Reprimand to Dismissal)
- 4. Willful Violation of Rules, Regulations or Policy (Level II Reprimand to Suspension)
- 5. Negligence in Following Rules, Regulation or Policies (Level I Reprimand to Level II Reprimand)

- 6. Refusal to Cooperate with Administrative Investigations (Written Reprimand to Dismissal)
- 7. Improper Conduct (Level I Reprimand to Dismissal)
- 8. Negligence in the Performance of Duty (Level I Reprimand to Dismissal)
- 9. Failure to Provide Accurate, Truthful and Complete Information (Level I Reprimand to Suspension)
- 10. Gross Negligence- Refusal to Properly Investigate and Refusal to acknowledge victims report as a crime
- 11. Conduct Non-becoming of an Officer-Ethics Officer
- 12. Negligent Infliction of Emotional Distress- Refusal to acknowledge victims report as a crime

The above referenced duties are based on both the Department's own internal policy and on general standards of conduct recognized by law enforcement agencies, primarily the latter. These failures left an ongoing victimization of the Appellant which continues to do severe emotional harm, serious economic harm including and not limited to major lifestyle changes do to health decline, infliction of intense emotional distress, mounting medical bills and loss of income, just to name a few of the methods of suffering the Appellant has endured.

2. DID THE TRIAL COURT ERR BY ENDORSING THE ORDER TO DISMISS 2 DAYS PRIOR TO THE ACTUAL HEARING OF THE CASE THEREFORE BLOCKING THE APPELLANT FROM THE OPPORTUNITY OF ANY CHANCE OF A FAIR AND UNBIASED HEARING AND REMOVING ANY OPPORTUNITY OF DUE PROCESS.

Answer: Yes. Both scheduling orders show the hearing date of May 18, 2016, yet the Judgement coversheets contain handwritten changes of the alleged preparation and filing of these documents for recordation, however, the Final Order, which was actually filed, stamped and recorded, was signed and dated on May 16, 2016

- The First Notice of Scheduling for the Hearing states that the hearing is scheduled for May 18, 2016 at 9:30am for "Motion to Strike" (**EXHIBIT "16"**)
- Notice of Scheduling for the Hearing states that the hearing is scheduled for May 18, 2016 at 9:30am for "Motion to Dismiss" (**EXHIBIT "17"**)
- Respondent's Attorneys submitted Proposed Order with Motion to Dismiss **PRIOR** to hearing as stated in Transcripts (**EXHIBIT "25"**) PG 11, lines 10-18

- The Appellant received the Judgement Coversheets (**EXHIBIT "18"**) with original date of May 16, 2016 which was changed (handwritten) to May 18, 2016 along with the final order which is signed by Judge L. Casey Manning and dated May 16, 2016 **FROM THE RESPONDENTS ATTORNEYS???** (**EXHIBIT "20"**) Respondents Initial Brief Pg. 3, 4th paragraph, beginning with the 2nd sentence, Respondent's Attorney states that "A signed order was sent to counsel for the Respondents by Judge Manning's Office, bearing the date May 16, 2016". It goes on to say "Counsel forwarded the order on to Appellant, proceeding pro se, that same day, by letter dated May 25, 2016". "A few days later, the Clerk of Court sent a copy of the recorded Order to all parties, along with the executed Form 4, bearing the date May 18, 2016. Counsel forwarded that copy along to Appellant as well, by letter dated June 3, 2016."
- Within the same week, Appellant received said Coversheet which handwritten dates changed from May 16, 2018 (overwritten by hand to read May 18, 2016) along with the final order, which was signed and dated by Judge L. Casey Manning signed and dated May 16, 2016, from Jeanette McBride, Clerk of the SC Court of Appeals. (**EXHIBIT "19a"**)
- Appellant then received a "Revised " Judgement Cover page (only) with the signature date of May 18, 2016 from the SC Court of Appeals on which handwritten dates were no longer on the document, but yet the document had a signature date of May 18, 2016 and the exact same filing stamp bearing the exact same date and time (exact same minute of 9:18am) of the first Coversheet???
- **ULTIMATE FACT:** FINAL ORDER, signed by Judge L. Casey Manning and dated May 16, 2016, which was two days prior to the actual hearing on May 18, 2016. (**EXHIBIT "17A"**).

Please See (EXHIBIT "21"): Canon 3, Items 2, 3, 5, (7), 7(ii), 7(b)(d)(C)(1)(2) To the extent reasonably possible, all parties or their lawyers shall be included in communications with a judge. A judge must make reasonable efforts, including

the provision of appropriate supervision, to ensure that Section 3B(7) is not violated through law clerks or other personnel on the judge's staff.

Additional Comment: Appellant is concerned and fearful of the her ability to receive a true opportunity for due process and right for true, proven elements of her complaint to be heard, considered and ruled on without bias towards the fact that she is self-represented and can only rely on her own research and sincere attempts to present documentation to support her claims according to the rules of the court with the above proof of bias by the court in relaying information to both parties simultaneously.

How can this legal process be unpolluted if Judge Manning's Office, by and through his clerks, sent information, as acknowledged, in writing, by the Respondent's own Attorney's that:

- A. "A signed order was sent to counsel for the Respondents by Judge Manning's Office, bearing the date May 16, 2016". It goes on to say "Counsel forwarded the order on to Appellant. (EXHIBIT "20")"

QUESTIONS:

- 1. Why was the signed order sent to Respondents Attorney and NOT simultaneously sent to the Appellant?**
- 2. How did the Respondents Attorney know that this order was not sent to the Appellant and therefore take it upon themselves to forward a copy to the Appellant?**

Respondents Initial Brief Pg. 3, 4th paragraph goes on to say:

- B. "A few days later, the Clerk of Court sent a copy of the recorded Order to all parties, along with the executed Form 4, bearing the date May 18, 2016."

QUESTIONS:

- 1. How did the Respondent's Attorney know that "A few days later, the Clerk of Court sent a copy of the recorded Order to all parties"?**

Again, please see: (EXHIBIT "21") Canon 3, Items 2, 3, 5, (7), 7(ii), 7(b)(d)(C)(1)(2) To the extent reasonably possible, all parties or their lawyers shall be included in communications with a judge. A judge must make reasonable efforts, including the provision of appropriate supervision, to ensure that Section 3B(7) is not violated through law clerks or other personnel on the judge's staff.

And finally, for ALL of the above mentioned reasons and valid documentation to support EACH and EVERY statement and considering the fact that the defense attorney's motion, filed on November 28, 2016, requesting a "stay of time" was never granted and the Appellant upheld her duties and submitted her final reply brief within the required time frame, but the respondent's attorney's have failed to do so as of the date of this document, the Appellant believes that this too, supports her request and again, begs of the court to remand the case over for a jury trial as requested in the Initial Civil Action Cover sheet and again on the final signature page number 44 of the original Complaint. Plainly stated, The Ultimate Facts have been established by the Appellant. Let it be known that this Appellant acknowledges the complexities of this matter and for that reason among others, does hereby request, again, for this case to be remanded for a trial by jury.

The Appellant, Biafra Monique Curtis, is an African - American female and citizen and resident of Beaufort County, South Carolina and was at the time of these occurrences a top producing salesperson for Hargray Communications in Bluffton South Carolina. The Plaintiff has had an extensive career in sales spanning many years and maintained an excellent work record receiving numerous nominations, awards and recognitions as top revenue generator throughout the entire company, number one in core sales, nominations and many other accolades with plans of retiring from this occupation at the age of 65 years old. Prior to September 27, 2012, I was healthy, happy, and excited about life. I was a single parent with a very healthy, active relationship with her child. I had a very successful career in which she was ranked Top Producer in the company while receiving many nominations for "Most Valuable Player" and awards for my performance as "Top Revenue Generator" for 1st Quarter of 2012 as well "#1 in Core Sales" throughout the entire Company of over 200 employees with yearly gross earnings in excess of \$50,000 per year with an excellent benefit package for myself and child, which included health insurance, dental insurance, vision insurance, and life insurance. I am now disabled, I have lost my career and because of my deteriorated health condition, lost out on the remaining months of an active relationship with my child which can never be recovered. I have hundreds of thousands of dollars of medical bills and will need both medical and mental care for the remainder of my life. I have had two spinal fusions, I still have two annular tears and a bulging disc in my lumbar region which I will have to have pain management and possibly another spinal fusion to correct in the future. Until such time of required surgery, I have monthly visits with a pain management specialist. I have been diagnosed with major depression, PTSD and Severe Anxiety. I have been institutionalized at Coastal Harbour Mental Health due to a mental breakdown as a

result of the continued legal battle and infliction of emotional distress and once released, was required to attend DAILY Intensive Outpatient Programs until I became stable enough to attend once weekly for mental therapy at Georgia Outreach Mental Care and monthly sessions with Psychiatrists at Sea Island Psychiatry and also at Horizon Mental Health. I have to take daily medications for depression, stress and anxiety ALL of which has been exacerbated by this systematic pattern of neglect and intentional acts of concealment of the acts and omissions of named Respondents in this suit. Prior to May of 2015, I had faith in the justice system and was certain that I guilty parties would have a softening to their cold, hard hearts, admit to their acts and omissions and have a common decency to atleast attempt to restore my losses incurred by their denial of my God created rights. I never expected an entire group of supposedly ethics officials to fight me and continue the victimization of what initiated the element of my complaint. **THEY ALL KNOW THEIR GUILT AND THEY WILL ALL HAVE TO ANSWER FOR IT BEFORE GOD.** They were able to go on with their lives as if nothing ever happened, yet my life was completely destroyed when my basic, human rights were refused to be granted by those with the duty and authority to do so. They don't care that all of my bills became delinquent, my credit was destroyed, I lost my car, I lost my job and I had to move out of my home. I literally had to learn to walk again and I have suffered the continuous infliction of mental and emotional distress with each and every step in fighting for my human rights and being denied over and over and over again. This systematic pattern of neglect and codes of silence must be addressed so that there would be correction, rather than further concealment of acts and omissions and I must be made whole by the parties who denied my rights to protection under the law and violation of my civil rights and right to due process. This is the same corruption which convinces this writer that this is not just a few, it is a widespread problem. I submitted complaints to the Office of Professional Responsibility in May of 2015, I received acknowledgement of my complaint from OPR Chief K.D. Phelps and assurance that a thorough investigation was warranted and would be conducted on June 5, 2015. Yet, on June 10, 2015, I received notice from General Counsel, Warren Ganjehsani, which refused to allow the investigation. These, amongst other acts violated laws which I, have a right to, laws that were clearly in place at the time of the "occurrences" and laws which denied my rights. The facts speak for themselves. I, still believe that there is someone, somewhere, with a thread of decency and will do what is right and decent to restore me and atleast attempt to restore my losses, even though most of them are somewhat irretrievable.

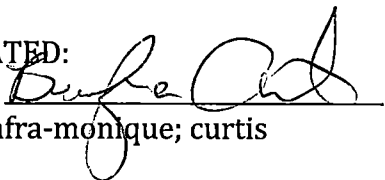
EXHIBITS REFERENCED IN THIS DOCUMENT ARE IN THE COURT RECORD, FILED ON
DECEMBER 28, 2016 ALONG WITH THE APPELLANTS FINAL REPLY BRIEF. Please see ALL
EXHIBITS.

I, the Appellant in this case, again, DEMAND A JURY TRIAL.

JURY TRIAL DEMAND


Plaintiff hereby demands a jury trial on all issues so triable.

DATED:

By 
biafra-monique; curtis

I certify that this response to motion contains no matter that is not relevant to this appeal.

January 9, 2017


Biafra Monique Curtis, Pro Se
PO BOX 21294
Hilton Head Island, SC 29925

FORM 7
PROOF OF SERVICE OF APPELLANTS RESPONSE AND OBJECTION TO
RESPONDENT'S OBJECTION AND MOTION TO COMPEL APPELLANT TO
CONFORM TO RULE 211 (b)

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Judge L. Casey Manning, Fifth Judicial Circuit

Appellate Case No: 2016-001239

Biafra Monique Curtis, Pro Se

Appellant

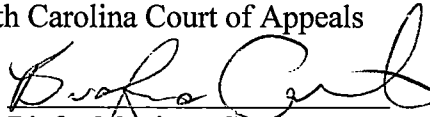
V.

South Carolina Department of Public Safety,
Warren Ganjehsani, Mike Oliver, Leroy Smith,
Kenneth Phelps, Anthony Grice, William Taylor,
Nicklous King, Willie McCauley, Jr., Ada Schmidt,
Aaron Canzater and Cherie Young, individually
and in their official capacities, et al. **Respondent(s)**

PROOF OF SERVICE

I certify that I have served the Proof of Service of Appellants Response And Objection To Respondent's Objection And Motion To Compel Appellant To Conform To Rule 211 (b) to the Honorable Jenny Abbott Kitchings, Clerk of Court South Carolina Court of Appeals PO BOX 11629 Columbia, SC 29211

January 9, 2017


Biafra Monique Curtis, Pro Se
PO BOX 21294
Hilton Head Island, SC 29925

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SC Court of Appeals

January 9, 2017

Attn: Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
PO BOX 11629
Columbia, SC 29211

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SC Court of Appeals

RE: Curtis vs. South Carolina Department of Public Safety, et al
Appellate Case No. 2016-001239

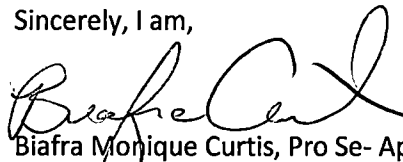
Greetings,

Enclosed please find for filing the Appellants Response And Objection To Respondent's Objection And Motion To Compel Appellant To Conform To Rule 211 (b), as well as a Certificate of Service.

Also enclosed, please find a NOTICE OF NON-DENIAL FOR LACK OF FORM.

Thank you in advance.

Sincerely, I am,



Biafra Monique Curtis, Pro Se- Appellant
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Hilton Head Island, SC 29925

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HILTON HEAD, SC
29925



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