

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JAN 13 2017

SC 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.....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.....Respondents

OBJECTION TO THE January 4, 2017 Filing of Appellant, Biafra Curtis, identified as "Exhibits to Support Final Brief" and MOTION TO COMPEL APPELLANT TO CONFORM RECORD ON APPEAL TO COMPLY WITH Rule 210, SCACR

YOU WILL PLEASE TAKE NOTICE, RESPONDENTS, by and through their undersigned attorney, hereby file a formal objection to the January 4, 2017 documents captioned "Exhibits to Support Final Brief," identified as documents referred to, but mistakenly left out of final brief. These documents include a set of "Notices" that are not a part of the record of this case, were not identified in any designation of matter to be included on appeal, and do not relate to this case.

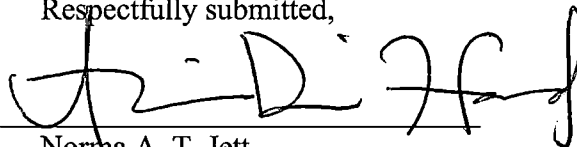
Respondents renew their request that the Court issue its Order compelling Appellant to conform the Record on Appeal to Comply with Rule 210, SCACR.

Respondents, by and through the undersigned, would additionally crave reference to the pending Motion of Respondents to Reform the Record on Appeal, filed with the Court of Appeals on November 28, 2016, and Motion of Respondents to Compel Compliance with Rule 211(b), filed January 3, 2017. Therein, Respondents previously requested a temporary stay with regard to the filing of final briefs, given the pending Motion to Reform the Record on Appeal. Respondents further ask the Court to consolidate any scheduling Orders in this matter, with regard to this motion, the November 28, 2016 motion, and the January 3, 2017 motion, in the Court's discretion, to provide the parties with a clear time line to comply with the filing and serving of the Record on Appeal and final briefs in this matter.

January 11, 2017

Respectfully submitted,

By:



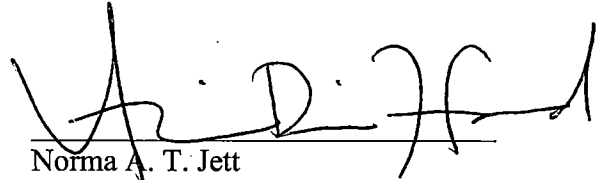
Norma A. T. Jett
Alison Dennis Hood
NESS & JETT, LLC
P.O. Box 909
Bamberg, South Carolina 29003
Telephone (803) 245-5178
Fax (803) 245-5384
ATTORNEYS FOR ALL RESPONDENTS

CERTIFICATE OF SERVICE

This is to certify that I, Alison Dennis Hood, Attorney for ALL RESPONDENTS, along with Norma A. T. Jett of Ness & Jett, LLC, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within **OBJECTION To January 4, 2017 Mailing AND MOTION TO CONFORM RECORD ON APPEAL** in the matter captioned *Biafra Monique Curtis, Pro Se v. SCDPS, et al.*, Appellate Case Number: 2016-001239 to the following parties, at the following addresses:

Biafra Monique Curtis
P.O. Box 21294
Hilton Head, SC 29925

Bamberg, S.C.
Jan. 11, 2017



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Attorneys for All Respondents

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RICHARD B. NESS†*
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JULIUS B. NESS
1916-1991

January 11, 2017

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

Re: *Biafra Monique Curtis v. SCDPS, et al.*
Appellate Case Number: 2016-001239

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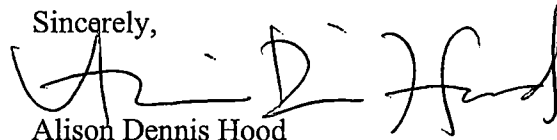
Dear Ms. Kitchings:

Please find enclosed an original and six copies, as well as a check for the filing fee, for **Respondents' Objection and Motion to Conform the Record on Appeal.**

By copy of this letter, I am serving a copy of these items on Appellant as shown below, and by the attached certificate of service. Please file the original and return a clocked copy to me in the enclosed envelope.

Thank you for your assistance.

Sincerely,



Alison Dennis Hood

ADH
Enclosures

cc: Biafra Monique Curtis
Appellant
PO Box 21294
Hilton Head Island, SC 29925



Ness & Jett, LLC
Post Office Box 909
Bamberg, South Carolina 29003

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