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S.C. SUPREME COURT

BEFORE THE SUPREME COURT OF SOUTH CAROLINA  
Appellate Case No. 2016-002541

State of South Carolina, and City of Columbia, SC

v.

Marie Assa'ad-Faltas, MD, MPH

On Petition for a writ of certiorari  
To the Court of Appeals of South Carolina

Petitioner's Motion to Restore her Right to Advocate pro se in All Matters  
Where Similarly-Situated Litigants Are Allowed to Advocate pro se  
And to Summarily Grant, Vacate and Remand to the Court of Appeals

By her undersigned counsel, appearing to make this motion and contemporaneous others, Petitioner prays this Court to restore her equal rights to advocate *pro se* in all her case *retroactively*. Upon restoration of that right, Petitioner prays this Court use the GVR procedure applied by the U.S. Supreme in appropriate cases and summarily reinstate and grant this petition for a writ of *certiorari* and remand the case to the Court of Appeals of South Carolina.

In support hereof, Petitioner shows that the sole reason for which the Court of Appeals dismissed her appeal, and the only applicable reason for which this Court dismissed her petition for a writ of *certiorari*, is the absence of counsel with a ban on Petitioner's self-representation in effect. That ban was issued during Petitioner's self-defense in long-running criminal accusations from which Petitioner, thank God, exonerated herself *pro se*. This Court later recognized that the ban violated Petitioner's Faretta rights and lifted it in part. Petitioner has since continued to argue that the remaining part of the ban violates her equal protection rights because other similarly-situated parties are routinely allowed to advocate *pro se* in this State. Petitioner now adds that to the extent the remaining part of the ban is permanent, it is comparable to a LWOP. Without waiving that the ban was undeserved *ab initio*, Petitioner shows that her conduct since the partial lifting of the ban on her *pro se* advocacy and since the rescission of a circuit court order limiting her access to the Richland County courthouse, demonstrates that she is eligible for full restoration of her rights of full access to the courts and plenary *pro se* advocacy therein. Restoration of Petitioner's rights would show this Court's prior orders as measured impositions designed to fulfill a purpose which they indeed fulfilled. By contrast, refusal to ever review said orders would prove them to have been, and to continue to be, discrimination merely for discrimination's sake.

WHEREFORE, Petitioner's rights to *pro se* advocacy should be fully restored; and thereupon, the underlying petition should be summarily reinstated and granted; and the matter should be remanded to the Court of Appeals for plenary review.

Respectfully submitted on February 21, 2017.

  
Orin G. Briggs, Counsel for Petitioner  
SC Bar # 883

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Certificate of Service

Orin G. Briggs hereby certifies that he has caused this document to be served on SC's Attorney General by hand-delivery on February 21, 2017, all God so willing.

  
Orin G. Briggs, Counsel for Petitioner