

**RECEIVED**

MAR 10 2017

SC Court of Appeals

**FORM 7  
PROOF OF SERVICE**

**PLEASE TAKE NOTICE: APPELLANT WILL RESPOND TO THE MARCH 2, 2017 MOTIONS, FILED BY THE RESPONDENTS AND SUBMIT RESPONSES AND OBJECTIONS TO THE MOTION TO REFORM THE RECORD ON APPEAL AND FOR AN EXTENSION OF TIME TO FILE FINAL BRIEFS UNTIL THE RECORD ON APPEAL CAN BE REFORMED WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017. ALSO, APPELLANT WILL RESPOND TO THE MARCH 2, 2017 ORDER WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017 AND SUBMIT RESPONSES AND OBJECTIONS TO THE RESPONDENTS MOTION TO DISMISS THE APPEAL, BASED ON APPELLANTS FAILURE TO COMPLY WITH THE JANUARY 26, 2017 ORDER OF THIS COURT.**

**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

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MAR 10 2017

SC Court of Appeals

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)**

**PROOF OF SERVICE**

I certify that I have served the Proof of Record on Appeal and Certificate from Appellant to the Respondent(s) by depositing a copy of it in the United States Mail, postage prepaid, on February 27, 2017, and to: Jeanette McBride Clerk of Court Richland County Court of Common Pleas Post Office Box 2766 Columbia, South Carolina 29202

March 3, 2017

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

843-684-3118

**FORM 7  
PROOF OF SERVICE OF RECORD ON APPEAL  
AND CERTIFICATE FROM APPELLANT**

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,  
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Kenneth Phelps, Anthony Grice, William Taylor,  
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and in their official capacities, et al.,

**Respondent(s)**

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SC Court of Appeals

**PROOF OF SERVICE**

I certify that I have served the Proof of Record on Appeal and Certificate from Appellant to the Respondent(s) by depositing a copy of it in the United States Mail, postage prepaid, on February 27, 2017, addressed to: Norma Jett, Esquire and Allison D. Hood, Esquire Post Office Drawer 909 Bamberg, SC 29003

February 27, 2017

Biafra Monique Curtis, Pro Se  
PO BOX 21294  
Hilton Head Island, SC 29925  
843-684-3118

**PLEASE TAKE NOTICE: APPELLANT WILL RESPOND TO THE MARCH 2, 2017 MOTIONS, FILED BY THE RESPONDENTS AND SUBMIT RESPONSES AND OBJECTIONS TO THE MOTION TO REFORM THE RECORD ON APPEAL AND FOR AN EXTENSION OF TIME TO FILE FINAL BRIEFS UNTIL THE RECORD ON APPEAL CAN BE REFORMED WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017. ALSO, APPELLANT WILL RESPOND TO THE MARCH 2, 2017 ORDER WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017 AND SUBMIT RESPONSES AND OBJECTIONS TO THE RESPONDENTS MOTION TO DISMISS THE APPEAL, BASED ON APPELLANTS FAILURE TO COMPLY WITH THE JANUARY 26, 2017 ORDER OF THIS COURT.  
THE STATE OF SOUTH CAROLINA**

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In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Judge L. Casey Manning, Fifth Judicial Circuit

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SC Court of Appeals

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V.

South Carolina Department of Public Safety,  
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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 FAXED THIS

**PLEASE TAKE NOTICE: APPELLANT WILL RESPOND TO THE MARCH 2, 2017 MOTIONS, FILED BY THE RESPONDENTS AND SUBMIT RESPONSES AND OBJECTIONS TO THE MOTION TO REFORM THE RECORD ON APPEAL AND FOR AN EXTENSION OF TIME TO FILE FINAL BRIEFS UNTIL THE RECORD ON APPEAL CAN BE REFORMED WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017. ALSO, APPELLANT WILL RESPOND TO THE MARCH 2, 2017 ORDER WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017 AND SUBMIT**

**RESPONSES AND OBJECTIONS TO THE RESPONDENTS MOTION TO DISMISS  
THE APPEAL, BASED ON APPELLANTS FAILURE TO COMPLY WITH THE  
JANUARY 26, 2017 ORDER OF THIS COURT.  
THE STATE OF SOUTH CAROLINA**

I certify that I have faxed this document to to: Honorable Jenny Abbott Kitchings, Clerk South Carolina Court of Appeals at (803)734-1839 and to the Respondent(s) by faxing a copy to the ATTENTION OF; Norma Jett, Esquire and Allison D. Hood, Esquire at their FAX # of: (803) 245-5384 and also to Jeanette McBride Clerk of Court Richland County Court of Common Pleas At the fax number of: (803) 576-1785

March 3, 2017

Biafra Monique Curtis, Pro Se  
PO BOX 21294  
Hilton Head Island, SC 29925  
843-684-3118

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SC Court of Appeals

Phone: 843-684-3118  
Fax: 866-481-6770

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SC Court of Appeals

**Fax**

**To: Jenny Abbott Kitchins**

**From: Biafra Monique Curtis**

**Fax: 8037341839**

**Pages: 5**

**Re: Notice of Intent to Reply**

**Date: March 09, 2017**

**PROOF OF SERVICE**

PLEASE TAKE NOTICE: APPELLANT WILL RESPOND TO THE MARCH 2, 2017 MOTIONS, FILED BY THE RESPONDENTS AND SUBMIT RESPONSES AND OBJECTIONS TO THE MOTION TO REFORM THE RECORD ON APPEAL AND FOR AN EXTENSION OF TIME TO FILE FINAL BRIEFS UNTIL THE RECORD ON APPEAL CAN BE REFORMED WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017. ALSO, APPELLANT WILL RESPOND TO THE MARCH 2, 2017 ORDER WITHIN THE REQUIRED DEADLINE OF MARCH 13, 2017 AND SUBMIT RESPONSES AND OBJECTIONS TO THE RESPONDENTS MOTION TO DISMISS THE APPEAL, BASED ON APPELLANTS FAILURE TO COMPLY WITH THE JANUARY 26, 2017 ORDER OF THIS COURT.

PO BOX 21294, Hilton Head Island, SC 29925