

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Workers Compensation Commission

Appellate Case # 2016-001257

RECEIVED

MAY 11 2017

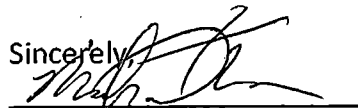
SC Court of Appeals

Michael Thompson, Employee, Claimant, Appellant,
V
KMS Inc., and Bridgefield Casualty Insurance Company
c/o Summit Holdings Inc., Carrier, Responde

REPLY TO RETURN MOTION FOR REVERSAL OR FULL REMAND
DUE TO NON-COMPLIANCE OF AN ORDER FROM
THE COURT OF APPEALS FILED ON MARCH 02, 2017

May 11, 2017

Sincerely,



Michael Thompson, Pro Se
116 Schoolbus Road
West Columbia SC, 29172
(803) 318-1292

INTRODUCTION

Pursuant to Rule 240 of the Appellate Court Rules, Appellant, Michael Thompson, Pro Se, file this Reply to the Return Motion of KMS, Inc., Bridgefield Casualty Insurance Company c/o Summit Holdings Inc. On 4/27/2017, the Appellant filed the " MOTION FOR REVERSAL AND FULL REMAND, DUE TO NON-COMPLIANCE OF A ORDER FROM THE COURT of APPEALS 03/02/17.

ARGUEMENTS

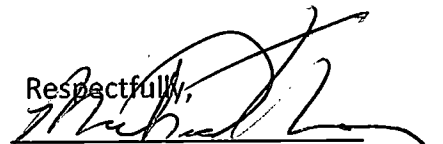
1) In the Respondents return, Council states "... citations are in line with the rule." The Appellants contends that Rule 208(b)(4), SCACR is clearly written as to what is to be included. "In the initial briefs, these references should be to the page and line of the transcript prepared by the court reporter or to the page of material to be referenced." The examples cited are for other material. Under the common law that, "IGNORANCE TO THE LAW IS NOT A DEFENSE", the Council for the Respondent has failed to follow the "Order" of The Courts filed on 3/2/2017.

2) In this "Order" , the Appellate Courts grant Respondents 30 days to serve and filed the amended initial brief, with strict and simply instructions to the referencing. The Council to the Respondents (Haggler) also added designations to his " Designation of Matter" without permission granted by the Appellate Courts. Once again Haiglers' actions in doing so violates the Court Rules along with my "U.S. CONSTITUTIONAL RIGHTS", under the 5th & 14th Amendments; for Due Process and Equality of the courts. As well as my " SC Constitutional Rights." S.C. Const ,atr. I , §3

3) By adding to the Designation of Matter. Council for the Respondent has also continued to present matter against the SCCAR's. rule 209(b) is very clear in the fact that only portions of transcripts, pleadings, orders, exhibits, or other materials which he proposes to use.(Rule 209(b),SCCAR). The Council for the Respondent proposes to have the entirety of the (H.T. and Depositions. See (pg. 3, Form 14 for Designation of Matter Example from Appendix C of the SCSAR.)

In conclusion, by Respondents failure to comply with the SCCAR's as well as the Order Of 3/2/2017, is the same as Failing to serve and file his initial brief. It has made it an unfair disadvantage for the Appellant to process the Reply Brief that he had to file. And present evidence to the contrary of the Respondents Initial Brief. Which violates the Appellants rights under the U.S. 5th & 14th Amendments along with SC Constitutional Rights. So the Appellant moves that due to Respondents "ignorance to laws/rules of the S.C. Code of Laws" along with the Appellates right to due process , and right to equality ask the Court of Appeals to affirm his motion.

Respectfully,



Michael Thompson, Pro Se
116 Schoolbus Rd
West Columbia,SC, 29172
(803) 318-1292

May 11, 2017

**FORM 14
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]**

**APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas**

George E. Brown, Circuit Court Judge

Case No. 2000-CP-00-0000

**Stephen L. Doe, as Personal
Representative of the Estate of
John B. Doe,**

Respondent,

v.

Jane C. Roe,

Appellant.

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Appellant proposes the following be included in the Record on Appeal:

- 1. Order of September 1, 2000;**
- 2. Order of December 1, 1990;**
- 3. Complaint;**
- 4. Answer;**
- 5. Transcript of Proceedings pp.2-6; 15-17; 29-36; 42-44; 61-80; and 90-99;**
- 6. Defendant's Request to Charge No. 4;**
- 7. Defendant's Exhibits 1, 6, and 7.**

I certify that this designation contains no matter which is irrelevant to this appeal.

January 20, 2001

**/s/ John E. Smith
John E. Smith
Post Office Box 123
Greenville, South Carolina 29000
(864) 000-0000**

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In The Court of Appeals

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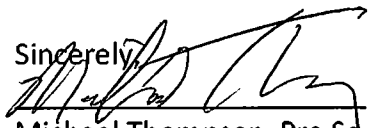
SC Court of Appeals

PROOF OF SERVICE

I certify that I have served a copy of Reply to Return Motion to the Respondent
By placing a copy in the United States Mail on May 11, 2017, addressed to Niculus L. Haigler
P.O. Box 11449, Columbia SC, 29211.

May 11, 2017

Sincerely,


Michael Thompson, Pro Se
116 Schoolbus Road
West Columbia SC, 29172
(803) 318-1292

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In The Court of Appeals

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SC Court of Appeals

Michael Thompson, Employee, Claimant, Appellant,
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KMS Inc., and Bridgefield Casualty Insurance Company
c/o Summit Holdings Inc., Carrier, Respondent

Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia SC, 29201

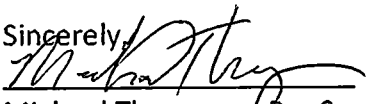
REPLY TO RETURN MOTION FOR REVERSAL
OR FULL REMAND DUE TO NON-COMPLIANCE
OF AN ORDER FROM THE COURT OF APPEALS FILED ON MARCH 02, 2017

Dear Ms. Kitchings,

Please find enclosed the original and six copies of the Reply to Return Motion along with the Proof of Service sent to the Respondent.

May 11, 2017

Sincerely,



Michael Thompson, Pro Se
116 Schoolbus Road
West Columbia SC, 29172
(803) 318-1292
