

JUNE 29, 2017

Daniel E. Shearouse, Clerk of Court  
In The Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, So. Car. 29211

RECEIVED

JUL 05 2017

S.C. SUPREME COURT

RE: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
Appellate Case No. 2017-001054  
Lower Court Case No. 2015-CP-11-0242

Dear Clerk,

Please find enclosed the original copy of the motion to reconsider Amendment SCRPC Rule 52 with exhibits and proof of service on the Attorney General's office.

Also, please find enclosed a self-addressed stamped envelope containing the cover letter and proof of service in the above-captioned case to be "clocked, date-stamped", filed by your office and clocked in copy of the same returned to me pursuant to rule 602 SCACR, as soon as feasible.

Respectfully Submitted,  
~~Steven W. Shearouse~~  
SCDC NO. 321946

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JUN 29 2017

MAILROOM  
TURBEVILLE CI

cc: Valerie Giovanoli  
Brandy McBee

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State of South Carolina

In The Supreme Court

JUL 05 2017

STEVEN V. LITTLEJOHN  
Appellant,

S.C. SUPREME COURT  
Appellate Case No. 2017-001054

Lower Court Case No. 2015-CP-11-0242

v.

State of South Carolina  
Respondent,

Motion To Reconsider Amendment  
SCRPC Rule 52

You will please take notice that the undersigned will move the court to reconsider its order dated May 17, 2017 for the following reasons:

I.

Ⓐ exercised Protected Conduct to file a timely complaint to the South Carolina Court Administration regarding Cherokee County Clerk's Office failure to file Ⓐ timely submitted "objections to the proposed final order of dismissal" on Jan. 3, 2017 sent to all parties. (see complaint filed exhibits no. 1 thru 12)

On May 12, 2017, Ⓐ received a copy of a letter dated May 9, 2017 from the South Carolina Court Administration addressed to the Cherokee County Clerk of Court stating "it would be appreciated if you would review this matter to assist him." (see exhibit no. 13). May 11, 2017 and May 19, 2017 Ⓐ notified this court that the matter was still pending. June 8, 2017 Ⓐ requested again for his

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"Objections TO THE Proposed Final Order OF Dismissal" to be Filed. On June 20, 2017 (A) received two letter from the Cherokee County Clerk of Courts Office stating that his objections to the proposed Final Order of Dismissal dated June 16, 2017 would not be filed pursuant to South Carolina Supreme Court order dated May 17, 2017 (See Exhibits 14, 15).

(A) received his motion to reconsider denial on April 17, 2017 dated April 7, 2017 and timely filed his motion to Amend on April 26, 2017 pursuant to SCRPC Rule 52 Motion.

### LAW/ANALYSIS

(A) Exercised Protected Conduct to timely file his Motion to Amend." A motion under rule 52 or 59(E) is timely if it is served not later than 10 days after receipt of written notice of entry of the order or judgment. *Coward Hund Const. Co. v. Ball Corp.* 336 S.C. 1, 3, 518 S.E. 2d 56, 57 (Ct. App. 1999).

Rule 203(b)(1), SCACR requires that the notice of appeal be served on all respondents within thirty days after receipt of written notice of entry of the order or judgment. The rule further provides, however, that "when a timely motion to alter or amend the judgment (Rule 52 and 59 SCRPC) has been made

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the time for Appeal for all Parties shall be stayed and shall run from receipt of written notice of the entry of the order "granting or denying such motion." (See Otten v. Otten 287 S.C. 166, 167, 337 S.E. 2d 207, 208 (1985) stating that when a party makes a motion for reconsideration "the time for appeal from judgment begins to run from the time of the order granting or denying the motion. (A) timely SCRPC Rule 52 motion tolled the time for filing an appeal.

The procedural rules and the law are clear and because the (B) did not follow proper procedure rules, the denial of the (A) SCRPC rule 52 motion is controlled by an error of law that deprived the (A) of a mode of trial (to have (A) timely objections to the proposed final order of dismissal properly filed, and to correct an obvious error in the conditional order of dismissal) to which the (A) is entitled to as a matter of right, the order is immediately appealable and reversible (Cobb v. South Carolina Dept. of Trans. 365 S.C. 360)

The actions of the (B) are prejudicial and procedurally defaulted the (A) appeal, violating the (A) substantive due process rights. (A) submits that the irregular procedural treatment received has the appearance of a discriminatory practice

At the hands of the State,

## CONCLUSION

Pursuant to the Holding in *Matthew V. Evans* and the Procedural Irregularities that occurred in the Denial of (A)'s SCRC 52 motion request (A mode of trial the (A) is entitled to as a matter of right and the (A)'s Due Process right to have his issues heard and ruled upon in the lower court regarding the Obvious Error in the Conditional Order of Dismissal and the proper filing of the (A) objections to the proposed Final Order of Dismissal.

(A) Prays that this Court will reverse its order or any other remedy that the Court deems just and proper, (A) has provided irrefutable evidence and has not violated any rules or laws. (A)'s Due Process rights must be protected.

Respectfully Submitted,  
Steven W. [Signature]  
SCRC NO. 321946

Dated June 29, 2017

CC: Valerie Giannoli  
Brandy McBee

4 OF 4

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JUN 29 2017

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State of South Carolina  
In The Supreme Court

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Appeal From Cherokee County  
The Hon. J. MARK HAYES, II  
Appellate Case NO. 2017-001054

---

Lower Case NO. 2015-CP-11-0242

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STEVEN W. LITTLEJOHN  
Appellant,

v.

STATE OF South Carolina  
Respondent,

---

PROOF OF SERVICE

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I, Steven W. Littlejohn do certify that I have served the "Motion To Reconsider Amendment" with exhibits No. 14 thru 15, No. 1-13 previously sent, on respondents counsel of record: South Carolina Attorney Generals Office, Mrs. Valerie G. Giannoli Esquire, Post Office Box 11549, Columbia, S.C. 29211 by depositing the same in the United States Mail, postage prepaid on this 29 day of June 2017.

C.C. Brandy W. MCBEE  
Daniel E. Shearouse

Steven W. Littlejohn  
SCDC NO. 321946

Dated June 29, 2017

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JUN 29 2017

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MAY  
~~APR 2~~ 2, 2017

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MAY 09 2017

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BRANDY W. MCBEE  
CLERK OF COURT  
CHEROKEE COUNTY, SC

2017 MAY - 5 A 10:50

FILED IN THE OFFICE  
CLERK OF COURT

The Honorable Brandy W. McBEE  
Cherokee County Clerk of Court  
P. O. DRAWER 2289  
GAFFNEY, SO. CAR. 29342

Re: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
CASE NO. 2015-CP-11-0242

Dear Clerk,

PLEASE FIND ENCLOSED A COPY OF A LETTER TO ROSALYN W. FRIERSON, Director of South Carolina Court Administration, MEMORANDUM OF LAW in Support of PCR Application, Status Check Return, A COPY OF Objections TO THE Proposed Final Order of Dismissal in Form of a Complaint Filing ISSUE in the ABOVE ACTION and A Certificate of Service in the ABOVE CAPTIONED CASE, to be clocked-date-stamped, Filed by your office and a clocked in copy of the same returned to me Pursuant to rule 602 SCACR, AS SOON AS FEASIBLE.

Respectfully Submitted,  
*Steven W. Garcia*

SCDC NO. 321946

CC: Valerie Garcia Giovanoli  
Assistant Attorney General  
Rosalyn W. Frieson, Director  
South Carolina Court Administration

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MAY 2 2017

MAILROOM  
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MAY  
~~April~~ 2, 2017

Rosalyn W. Frierson, Director  
South Carolina Court Administration  
1015 Sumter St. Ste. 200  
Columbia, So. Car. 29201

FILED IN THE OFFICE  
CLERK OF COURT  
2017 MAY -5 A 10:50  
BRADY WINDBEE  
CHEROKEE COUNTY, S.C.

Re: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
CASE NO. 2015-CP-11-0242

Dear Director Frierson,

The Cherokee County Clerk's Office failed to file Applicant's objections to the Proposed Final Order of Dismissal in its entirety by removing some of the documents contained, tampering with the evidence, preventing Applicant's objections from properly being filed, violating his procedural due process rights.

### Procedural History

Applicant received the original Proposed Order of Dismissal dated December 26, 2016 on December 28, 2016 (See Exhibit No. 1). Applicant timely submitted his "Objections to the Proposed Final Order of Dismissal" on January 3, 2017 to Caitlin Hastings, Assistant Attorney General, Judge J. Mark Hayes II, Chief Administrative Judge, requesting that it be clocked-date-stamped and a clocked-in copy returned

in the self-addressed envelope provided. (See exhibit No. 2+3).

On February 8, 2017 A wrote Clerk of Spartanburg County M. Hope Blackley, regarding his not receiving his timely filed objections, Clerk stated this was not a Spartanburg County case. (See exhibits No. 4+5) On March 2, 2017 A wrote Cherokee County Clerk of Court regarding his objections to the Proposed Final Order of Dismissal stating that he had not received these documents and asked for their return. (See exhibit No. 6)

On March 15, 2017 A wrote the Cherokee County Clerk requesting the filed copy of the original Proposed Final Order of Dismissal objections date January 3, 2017 and not the "Motion to Reconsider" filed January 20, 2017 that was sent in error. (See exhibit No. 7) A did not receive a response from the Clerk's office.

On April 17, 2017 A submitted his original objections to respondents return to Applicant's motion to reconsider to Judge Hayes, Chief Administrative Judge, Valerie Giovanoli, Assistant Attorney General and the Clerk of Cherokee County Office that was received by A April 25, 2017 with the following documents being removed and not filed. (See exhibits No. 8+9)

1. The original objections to the Proposed Final Order of Dismissal (See exhibits No. 10, pages 1-12)

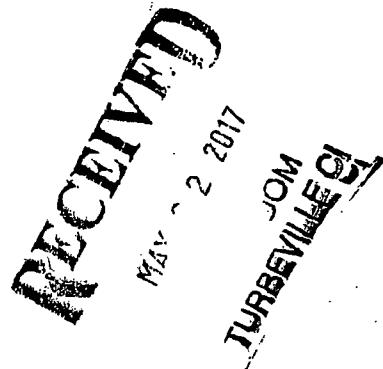
2. Copy of The memorandum of Law in Support of PCR Application (See exhibits NO. 11, Pages 12-29)
3. Copy of The Case Status Check return (See exhibit NO. 12, Page 1 of 1)

(A) Submitts that his objections to the Proposed Order was timely filed with Notice given to All Parties (Attorney General and Judge). The Clerk's Office is trying to white wash my claim due to not filing what I have sent to the Clerk's Office and Respondent Counsel of record. As an issue not properly presented and shown by the record will ~~not~~ result in a Decision by the Appellant Court that the issue raised by the Applicant is not preserved for the record.

I Am requesting that you Direct the Clerk's Office to file the Documents that I Submit for filing. (R) It will not be Prejudice by this Decision because they were already served and I have been pursuing my right diligently. It is evident by the filing mentioned here in. In short, I have not slept on my rights.

With kind regards, I am  
Steven W. Steyer  
SCDC NO. 321946

CC: Valerie Giovanoli, Assistant Attorney General  
Brandy W. McBee, Clerk of Court Cherokee County



State of South Carolina  
County of Cherokee

In The Court of Common Pleas  
For The Seventh Judicial Circuit

Steven W. Littlejohn

SCDC No. 321946

Applicant,

v.

State of South Carolina

Respondent,

CASE No. 2015-CP-11-0242

Certificate of Service

FILED IN THE OFFICE  
CLERK OF COURT  
2015 MAY - 5 P 2:26  
STEVEN W. LITTLEJOHN  
CHEROKEE COUNTY, SC

I have this day served the South Carolina Attorney General's Office (Respondent) a copy of the Complaint filed to the South Carolina Court Administration in the above captioned case on the following person listed below by depositing the same in the United States Mail, Postage Pre-Paid Addressed to:

Valerie Garcia Giouanolli  
Assistant Attorney General  
S.C. Attorney General Office  
Post Office Box 11549  
Columbia, So. Car. 29211

Steven W. Littlejohn No. 321946  
Steven W. Littlejohn  
T.C.I. SIA No. 124B  
1578 Clarence Coker Hwy.  
Turbeville, So. Car.

29162

Dated April, 2017

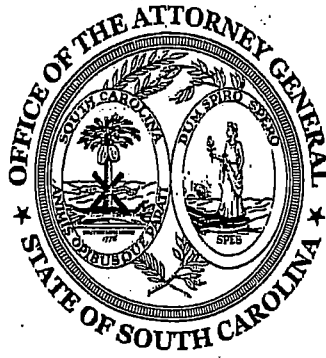
CC: Rosalyn W. Freese, Director  
South Carolina Court Administration  
Brandy W. McBee  
Clerk of Court, Cherokee County

RECEIVED

MAY 02 2017

CLERK OF COURT  
TURBEVILLE, SC

17-28-16



ALAN WILSON  
ATTORNEY GENERAL

December 20, 2016

RECEIVED

DEC. 28. 2016

MAILROOM  
- TURBEVILLE CI

The Honorable J. Mark Hayes, II  
Chief Administrative Judge-CP, 7th Circuit  
180 Magnolia Street  
Spartanburg SC 29306

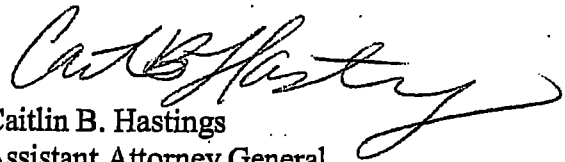
Re: Steven W. Littlejohn v. State of South Carolina  
2015-CP-11-0242

Dear Judge Hayes:

Enclosed please find the original proposed **Final Order of Dismissal** in the above-captioned case. For your convenience, I am enclosing a copy of the signed and served Conditional Order of Dismissal for your review.

If this Order meets your approval, please sign and forward to the clerk's office in the enclosed addressed envelope and have her serve the order on all parties. If you have any questions, please feel free to contact me.

Sincerely,

  
Caitlin B. Hastings  
Assistant Attorney General

CBH/ah  
Enclosure(s)

cc: Steven W. Littlejohn, #321946

Exhibit No. 1

State of South Carolina  
County of Cherokee

Steven W. Littlejohn  
S.C.D.C. NO. 321946  
Applicant,

v.

State of South Carolina  
Respondents,

In The Court of Common Pleas  
For The Seventh Judicial Circuit

CASE NO. 2015-CP-11-0242

Certificate of Service

**RECEIVED**

JAN 03 2017

MAILROOM  
TURBEVILLE CI

I have this day served the South Carolina Attorney General's Office (Respondent's) a copy of the objections to the proposed final order of dismissal in the above captioned case on the following person listed below by depositing the same in the United States Mail, postage pre-paid addressed to:

Caitlin B. Hastings  
Assistant Attorney General  
S.C. Attorney General's Office  
Post Office Box 11549  
Columbia, So. Car. 29211

Steven W. Littlejohn No. 321946  
Steven W. Littlejohn  
T.C.E. S/A #124B  
1578 Clarence Coker Hwy.  
Turbeville, So. Car.  
29162

Dated Jan 3, 2017

Exhibit No. 2

JANUARY 3, 2017

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JAN 03 2017

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The Honorable J. MARK HAYES II  
Chief Administrative Judge - CP, 7th Circuit  
180 MAGNOLIA STREET  
SPARTANBURG, SO. CAR. 29306

Re: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
2015-CP-11-0242

Dear Judge Hayes:

Enclosed please find the original copy of the objections to the proposed final order of dismissal, a copy of the memorandum of law in support of PCR application, certificate of service and a copy of the case status check return from the Cherokee County, Clerk of Court regarding the 59(F) sent to the Attorney General stating "this will be scheduled by the Attorney General's office."

Please have your clerk clock stamp date the enclosed certificate of service and letter return to me in the self-address envelope.

Your assistance in this matter will be greatly appreciated.

Respectfully submitted,  
*Steven W. Littlejohn*  
STEVEN W. LITTLEJOHN NO. 321946

cc CATHERINE B. HASTINGS  
ASSISTANT ATTORNEY GENERAL

EXHIBIT NO. 3

February 8, 2017

M. Hope Blackley,  
Spartanburg Clerk of Court, Civil Division  
180 Magnolia Street  
Spartanburg, So. Car. 29306

**RECEIVED**

MAR 02 2017

MAILROOM  
TURBEVILLE CI

Re: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
2015-CP-11-0242

Dear Clerk:

On January 3, 2017, I placed in the SCDC Mail System the original copy of the objections to the Proposed Final Order of Dismissal, in the above captioned case, addressed to the Honorable J. Mark Hayes II, Chief Administrative Judge-CP, 7th Circuit at this address.

I requested that a filed clock stamp dated copy of these documents be returned to me in the enclosed self addressed envelope provided. As of today's date, I have not received these documents.

Would you please have these documents returned to verify delivery and for my records. Your assistance in this matter will be greatly appreciated.

Respectfully Submitted

*Steven W. Littlejohn*

STEVEN W. LITTLEJOHN  
SCDC NO. 321946

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FEB 27 2017

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TURBEVILLE CI

**RECEIVED**

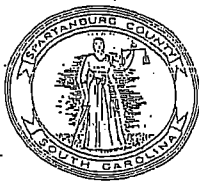
FEB 08 2017

MAILROOM  
TURBEVILLE CI

Exhibit NO. 4

Spartanburg County Court House  
180 Magnolia Street  
P. O. Box 3483  
Spartanburg, SC 29304-3483

Phone (864) 596-2591  
Fax (864) 596-2259



M. Hope Blackley  
Clerk of Court

Gail Moffitt  
Assistant Clerk of Court

From: Spartanburg County Clerk of Court Office

The enclosed document(s) is being returned for the following reason(s):

- Master's fee required
- Signature required
- Original document required
- Satisfaction of Judgment required
- Check or Money Order must be made payable to the Clerk of Court
- Check not signed
- Insufficient filing fee: Please submit a business check or money order in the amount of \$ \_\_\_\_\_
- Lis Pendens cancellation fee require (\$1.00)
- Coversheet not included (SCCA/23)
- Missed Non-Spartanburg County Case**
- Please check our website for the requested information [www.spartanburgcounty.org](http://www.spartanburgcounty.org)
- Please submit all 7 pages of your completed PCR Application

I suggest you contact your attorney

Other: Cherokee County is # 11

Please make the necessary corrections and return for processing.

From: P. Moore

Date: 2/14/17

**RECEIVED**

MAR 02 2017

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**RECEIVED**

FEB 27 2017

MAILROOM  
TURBEVILLE CI

Exhibit No. 5

March 2, 2017

Mrs. Brandy W. McBee  
Clerk of Court, Cherokee County  
Post Office Drawer 2289  
Gaffney, So. Car. 29342

Re: Steven W. Littlejohn v. State of South Carolina  
2015-CP-11-0242

Dear Clerk:

Please find enclosed a copy of the original letter sent to the Spartanburg County Clerk's Office and a copy of the response received regarding the objections to the proposed final order of dismissal submitted by the Attorney General's Office, in the above captioned case, that was addressed to the Honorable J. Mark Hayes II, Chief Administrative Judge - CP, 7th Circuit, 180 Magnolia Street Spartanburg, So. Car. 29306.

I requested that a filed clocked stamp dated copy of these documents be returned to me in the enclosed self address envelope provided. As of today's date, I have not received these documents.

Would you please have these documents returned along with the current enclosures to verify delivery, filing and for my records. Your assistance in this matter will be greatly appreciated.

Respectfully Submitted,

Steven W. Littlejohn  
Steven W. Littlejohn  
S.C. D.C. NO. 321946

**RECEIVED**

MAR 02 2017

MAILROOM  
TURBEVILLE CI

Exhibit No. 6

March 15, 2017

Mrs. Brandy W. MCBEE  
Clerk of Court, Cherokee County  
Post Office Drawer 2289  
Gaffney, So. Car. 29342

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MAR 15 2017

MAILROOM  
TURBEVILLE CI

Re: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
2015-CP-11-0242

Dear Clerk,

On January 3, 2017, I placed in the SCDC mail system the original copy of the objections to the proposed final order of dismissal with the following enclosures: a cover letter, a copy of the memorandum of law in support of PCR application, a certificate of service and a copy of the case status check return from the Cherokee County, Clerk of Court regarding this rule 59 (E) motion being sent to the Attorney General stating "this will be scheduled by the Attorney General's office."

I requested that these documents to be filed and a clocked stamp dated copy be returned to me in the enclosed self addressed envelope. As of today's date, I have not received these documents.

Would you please have copies of these documents returned to me along with this letter to verify delivery, filing and for my records.

Your assistance in this matter is greatly appreciated. The previous information sent was not the copies I needed.

Respectfully submitted,  
Steven W. Littlejohn  
SCDC NO. 321946

Exhibit NO. 7

**COPY**

April 17, 2017

The Honorable J. MARK HAYES, II  
Chief Administrative Judge - CP, 7th Circuit  
180 MAGNOLIA STREET  
SPARTANBURG, SO. CAR. 29306

FILED IN THE OFFICE  
CLERK OF COURT  
2017 APR 20 A 11:02  
SHERIFF #10000000  
CHEROKEE COUNTY, SC

RE: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
2015-CP-11-0242

Dear Judge Hayes:

Enclosed please find the original objections to respondents return to Applicant's Motion to reconsider, a copy of the original objections to the proposed final order of dismissal, cover letter, a copy of the memorandum of law in support of PCR applications, certificate of service and a copy of the case status check return from the Cherokee County Clerk of Court regarding the 59(c) sent to the Attorney General stating "this will be scheduled by the Attorney General's Office and is contrary to the respondents requested order."

Your assistance in this matter is greatly appreciated.

Respectfully submitted

*Steven W. Littlejohn*

STEVEN W. LITTLEJOHN

SCDC No. 321946

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APR 17 2017

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TURBEVILLE CI

EXHIBIT NO. 8

Valerie Garcia Giovannoli  
Assistant Attorney General

**RECEIVED**

APR 25 2017

MAILROOM  
TURBEVILLE CI

April 17, 2017

The Honorable Brandy W. McBee  
Cherokee County Clerk of Court  
P.O. Drawer 2289  
Gaffney, So. Car. 29342

FILED IN THE OFFICE  
CLERK OF COURT  
2017 APR 20 A 11:02  
BRANDY W. McBEE  
CHEROKEE COUNTY, SC

RE: STEVEN W. LITTLEJOHN V. STATE OF SOUTH CAROLINA  
2015-CP-11-0242

DEAR MS McBEE,

ENCLOSED PLEASE FIND A COVER LETTER TO JUDGE HAYES II, THE ORIGINAL  
OBJECTIONS TO RESPONDENTS RETURN TO APPLICANT'S MOTION TO RECONSIDER,  
A COPY OF THE ORIGINAL OBJECTIONS TO THE PROPOSED FINAL ORDER OF DIS-  
MISSAL, COVER LETTER, A COPY OF THE MEMORANDUM OF LAW IN SUPPORT OF  
PCR APPLICATION, CERTIFICATE OF SERVICE AND A COPY OF THE CASE STATUS  
CHECK RETURN FROM THE CHEROKEE COUNTY CLERK OF COURT REGARDING THE  
59(E) SENT TO THE ATTORNEY GENERAL STATING "THIS WILL BE SCHEDULED  
BY THE ATTORNEY GENERAL'S OFFICE, IN THE ABOVE-CAPTIONED CASE, TO  
BE" CLOCKED-DATE-STAMPED, FILED BY YOUR OFFICE AND A CLOCKED IN  
COPY OF THE SAME RETURNED TO ME PURSUANT TO RULE 602 SCACR,  
AS SOON AS FEASIBLE.

CC: VALERIE GARCIA GIORAVOLI  
ASSISTANT ATTORNEY GENERAL

With The Kindest regards,  
Steven W. Littlejohn # 321946

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**RECEIVED**

APR 17 2017

APR 25 2017

MAILROOM  
TURBEVILLE CI

Exhibit No 9

MAILROOM  
TURBEVILLE CI

State of South Carolina  
County of Cherokee

STEVEN W. LITTLE; JOHN  
S.C.D.C. NO. 321946  
Applicant,

V.

State of South Carolina  
Respondent,

In the Court of Common Pleas  
for the Seventh Judicial Circuit

CASE NO. 2015-CP-11-0242

Objections to the Proposed  
Final Order of Dismissal

**RECEIVED**

JAN 03 2017

MAILROOM  
TURBEVILLE CI

### Procedural History

On May 21, 2007 (A) pled Guilty to various drug charges. The Court ultimately sentenced (A) to 15 years on August 15, 2007. (A) filed his first PCR application, 2007-CP-11-0495 (A) hearing was held on April 8, 2008. The Court denied this PCR application by order dated August 6, 2008. A motion for 59(E) was timely filed and denied Nov. 19, 2008. A timely notice of appeal was filed and the writ of certiorari was timely filed on June 24, 2009.

While this appeal was pending and after the final order denying PCR relief was final. The (B) petitioned the Supreme Court under SCACR rule 224 to correct the record and file a supplemental appendix which changed the records "5"

to "15" years in numerous places. (A)'s Counsel filed a motion in opposition to the change. The Court allowed this change to be done and ultimately denied the writ of certiorari. JAN. 21, 2010. The (A) timely filed his Federal Habeas Corpus April 15, 2011.

ON MAY 23, 2012, while the Federal Habeas Corpus was pending the (A) received knowledge about the state's motion and the S.C. Supreme Court Amendment of the record from "5" to "15" years using a "Reserved Rule SCOR 224". ON MAY 30, 2012 the Federal Habeas Corpus was denied.

The (A) timely petitioned the Fourth Circuit of Appeals for a C.O.A. which was denied Dec. 26, 2012. ON MARCH 22, 2013 while in Federal Court (A) filed his 2nd PCR on the grounds of prosecutorial misconduct and (A) timely filed his writ to the U.S. Supreme Court. The Supreme Court denied this petition Oct. 15, 2013.

IN JAN. 2014 the state petitioned the court to dismiss the 2nd PCR based on the newly discovered evidence. This 2nd PCR progressed all the way through the state court proceeding and was ultimately denied in Federal District Court Nov. 30, 2016 while the 3rd action was pending in state court.

The state submitted a conditional order of dismissal of the 2nd action on JAN. 23, 2014. This order was signed MARCH 24, 2014. The (A) sustained a heart attack Feb. 1,

2014 and WAS hospitalized For 18 days (Feb. 12, 2014) (A) ASKED the Court For A motion For extension OF time due to (A) medical Illness Not At the (A)'s Control And the (A) WAS Not Able to respond Due to Such medical Illness to the (A)'S Summary Dismissal.

On June 6, 2014 SCDC (Health Information Services) Confirmed that they sent this requested medical Record to Judge Derham Cole Concerning (A)'s medical status. Oct. 10-15, 2014, (A) WAS hospitalized and received A Heart Catheterization Surgery A second time Concerning his Previous medical Condition on Dec. 31, 2014 while the 2nd PCR WAS Still under Conditional Dismissal. (A) ASKED the Court to Dismiss without Prejudice or hold in Abeyance or enjoin the third Action.

Jan. 20, 2015 (A) Filed his 3rd PCR Action (2015-cp-11-0242) And essentially raised to the Court Lack of Subject Matter Jurisdiction and ineffective Assistance of Appellant Counsel ON Jan. 26, 2015, This Application WAS returned with A Stamped "Clocked in error" ON Jan. 29, 2015. (A) Wrote the Clerk of Court Asking for A "Status Check" ON the disposition OF this Action that WAS like wise returned Clocked in error ON Feb. 3, 2015.

ON Feb. 5, 2015 (A) Filed A Mandamus with the Supreme Court to Compel SCDC to Notarize legal Documents so that it could be Filed ON Mar. 17, 2015. The Dept. of

Correction MAILROOM STAFF (Mrs. Hodge) indicated that PCR's did NOT need to be Notarized causing this "clocked in error". (A) re-Submitted his third PCR Action, on MAY 8, 2015 the FINAL order of Dismissal of the 2nd PCR Action was received by (A) June 29, 2015, the subsequent 59(E) was denied. July 14, 2015 the Notice of Appeal from this 2nd PCR Action (2013-CP-11-0192) was timely filed and on August 5, 2015 (A) Filed his Pro Se brief.

ON Sept. 14, 2015 (A) received from the Circuit Court A Proposed order of Dismissal concerning the 3rd PCR Action on Sept. 20, 2015 the Court Conditionally Dismissed the third Action. ON Oct. 16, 2015 (A) Filed his 59(E) motion asking the Court to Dismiss the third Action "Without Prejudice" as improperly filed due to the second Action still pending.

ON MARCH 18, 2016, (A) ASKED FOR A STATUS CHECK ON BOTH the 2nd and 3rd Actions, which was received by the Court ON MARCH 28, 2016 and received it back from the Court ON April 6, 2016. The Clerk's OFFICE indicated in their response that "This rule 59(E) will be scheduled by the Attorney General's OFFICE."

ON July 8, 2016 (A) received a letter from the S. C. Supreme Court indicating that the Appeal from the 2nd PCR dismissal and assigned a Case No. 2016-001368. ON July 25, 2016 (A) Submitted an explanatory brief and

received AN ORDER OF DISMISSAL Aug. 10, 2016 (A) Filed  
A Petition for rehearing ON Aug. 22, 2016 AND ON  
Sept. 7, 2016 REHEARING WAS DENIED AND CASE REMITTED  
to the lower Court, ON Oct. 31, 2016 (A) File to  
the Fourth Circuit Court of Appeals for AN ORDER  
Authorizing A Second Successive HABEAS CORPUS  
APPLICATION to be Filed. This was denied ON ~~11-28-16~~  
(11-28-16).

## Statute of Limitation

### Equitable tolling

The (A) Submits that the States Assertion that this Action is "well outside" the expiration of the statute of limitations is erroneous.

As the Court knows that After Plea on May 21, 2007 the (A) had either 10 days to file his notice of Appeal which will toll the statute of limitation. However, (A) Filed his First PCR Action on Aug. 15, 2007 (90 days). The time during which this Action is pending is like wise tolled as it relates toward his statute of limitations. This Action was ultimately Denied in Federal Habeas Corpus on Oct. 15, 2013. The time as it relates toward the statute of limitations would have been tolled absent the (90 days) it took to file the first PCR Action.

However, (A) Filed a Second PCR Action on March 27, 2013 Due to his actual discovery (of newly discovered evidence) about the States having a substantial change to the Plea Record. Specifically having "5" replace with 15 years thereby cleansing the record of (A) Substantive issue that there was a "5" year Deal on the table which the State Argued that it was simply a scrivener's error. Under S.C. law 17-27-45(c) the one year statute would not have begun on this claim until the actual

discovery of the issue.

Further this was accomplished by using a SCACR rule 224 that had been "Reserved" as a point of clarity. It was reserved on May 3, 2007 and (A) was tried May 21, 2007. The actual discovery date was May 23, 2012 and the second PCR Action being filed March 22, 2013 (10 months) after the actual discovery of the change by way of using a rule that had been "Reserved".

The State submitted a Conditional Order of Dismissal on March 24, 2014 signed by the trial judge creating a conflict of interest. Subsequently (A) sustained a verified heart attack that the S.C. Dept. of Corrections provided verification, on Feb. 1, 2014 and was hospitalized until February 18, 2014 (18 days) preventing (A) from pursuing his legal action. This action was ultimately dismissed June 29, 2015. However, during this pendency Oct. 10-15 2014, during the 2nd action the (A) was hospitalized again concerning his chronic heart condition (heart attack).

During the pendency of the 2nd PCR Action (A) filed a motion due to his inability to respond timely in the second action and the state misconstrued this as a third PCR action. However the (A)'s intent was for it to be an extension while awaiting a ruling from his stipulated motion due to his illness, of the second action. Likewise this "third action" as it should be considered timely.

## SUCCESSIVENESS

The A would contend further as discussed in Matthew V. Evans that South Carolina would entertain successive PCR where

1. A's Counsel does not differ from that he had at trial or
2. Where A "Files" his application without the benefit of counsel or
3. Where there are so many procedural irregularities in his case

### I.

The case here is due to the change of the record based on a SCACR rule 224 that was "Reserved". It would be debatable among jurist of reason as to if that would constitute procedural irregularities, and

### II.

Due to the fact that A prepared his PCR Application without the aid of counsel he would be entitled to a new hearing under the second exception of Matthew V. Evans: A filed and prepared his application without the benefit of counsel.

AFTER THE APPOINTMENT OF COUNSEL, THERE WAS NEVER ANY CHANGE OR MODIFICATIONS TO THE INITIAL UN-COUNSELED APPLICATION.

Also, (A) asserts that this error of law only became evident on appeal and after his first PCR hearing had concluded. BECAUSE it had occurred while the first PCR was up on appeal he (A) could not have raised that on his first collateral review.

Like wise, the protections of counsel extends to (A)'s first appeal as a matter of right see Austin (Supra) ACE (Supra) because these errors of law occurred after his first PCR hearing and while his case was upon appeal and the state used a rule (SCACR) 224 that had been "reserved" and coupled with the evidentiary fact that the "5" was material to (A) case as (A) repeatedly mentioned contrary to the state's contention that it was not "explicitly discussed" (the 5 year offer)

The omission or change was scrivener's error. This is not true because if it had not been discussed why did the state motion the court to take the language out of the record before proceeding on appeal from the first PCR hearing. Therefore, (A) has not had "one bite of the apple" as it were.

ONE BITE OF THE APPLE WOULD BE TRIAL AND APPEAL

When the first appeal from the Denial of the First PCR, that was based on a record that had been white washed of the necessary language that would have substantiated (A)'s appeal that (A) was offered "5" years to plea and then was blind sided to take "15" or get 30 years if he did not plea.

As a matter of law, the (A) is entitled to a trial and appeal "as a matter of right" and as discussed in the statement of the case the (A) has been pursuing his legal rights diligently. He has not slept on his rights as it were.

### Conclusion

The (A) contends that either:

A.

Because the (A) has never received a full adjudication on the merits based on an accurate transcript that he has never received "one bit at the apple" as it were.

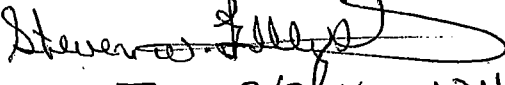
B.

The (A) would be entitled to a second hearing under the holding in *Matthew V. Evatt*

1. Petitioner prepared his application without the aid of counsel, or,

2. Where there was Procedural Irregularities due to the state's usage of a rule placed in reserved to change the record and white wash evidence that was material to the (A) case. In chief.

Applicant Prays that this Court will also take into consideration that he is a pro se litigant without substantial knowledge and experience in the matters of law and the court will assist him to assure fairness.

Respectfully Submitted,  
Steven W. Littlejohn NO. 321946  
  
T.C.I. S/A NO. 124B  
Turbeville, So. Car. 29162

C.C. Caitlin B. Hastings  
Assistant Attorney General  
S.C. Attorney General's Office  
Post Office Box 11549  
Columbia, So. Car.

29211

Dated JAN 3, 2016

State of South Carolina  
County of Cherokee

Steven W. Littlejohn  
S.C.D.C. NO. 321946  
Applicant,

v.

State of South Carolina  
Respondents,

In The Court of Common Pleas  
For The Seventh Judicial Circuit

CASE NO. 2015-CP-11-0242

Certificate of Service

**RECEIVED**

JAN 03 2017

MAILROOM  
TURBEVILLE CI

I have this day served the South Carolina Attorney General's Office (Respondent's) a copy of the objections to the proposed final order of dismissal in the above captioned case on the following person listed below by depositing the same in the United States Mail, postage pre-paid addressed to:

Caitlin B. Hastings  
Assistant Attorney General  
S.C. Attorney General's Office  
Post Office Box 11549  
Columbia, So. Car. 29211

Steven W. Littlejohn No. 321946  
Steven W. Littlejohn  
T.C.I. S/A #124B  
1578 Clarence Coker Hwy.  
Turbeville, So. Car.  
29162

Dated Jan 3, 2017

State of South Carolina  
County of Cherokee

015CP-10242  
In The Court of Common  
Pleas & Judicial Circuit

Steven W. Little John  
applicant

C/A No. \_\_\_\_\_

-Vs.-

Memorandum of Law  
in support of  
Application for P.C.B.

State of South Carolina  
Respondent

FILED IN OFFICE OF  
CLERK OF COURT  
CHEROKEE COUNTY, S.C.  
2015 JAN 17 PM 1:20  
BRANDY W. MCBEE

Henceforth, cometh the applicant, before  
Honorable court, with a Memorandum of Law in  
support of Application for Past-Conviction Relief,  
pursuant to the Statutory provisions, rules, and  
principles of 11.1 SCBCP and Title 17 that governs  
such filing. Notice: Reserve the right to Amend  
upon receipt of Transcripts,

FILED IN OFFICE OF  
CLERK OF COURT  
CHEROKEE COUNTY, S.C.  
2015 JAN 23 PM 11:55  
BRANDY W. MCBEE

Procedural History

The applicant, in the herein case was  
sentenced upon the Orders of Cherokee  
County Court of General Sessions, on  
May 21, 2007 to a (15) fifteen year eighty-

Five percent sentence, for an alleged assort-  
ment of various drug offenses ranging from-

12 of 29  
12 of 29      22 of 40

(PWID) near a school zone and/or playground and Trafficking of a 3rd and 2nd offense combined.

Trial counsel, (Roger Poole) did not perfect a direct appeal of applicant's conviction.

The applicant, then submitted a P.C.R., August 17, 2007, raising various issues of ineffective assistance of counsel, an evidentiary hearing was convened on April 8, 2008, before

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the Hon. Kenneth G. Goode, of Spartanburg County such was denied and dismissed August 6, 2008, and in the same a follow up of a 59(e) was submitted, but denied relief on November 19, 2008,

After which a Writ of Cert., for petitioner, June 24, 2009 was submitted, and denied also on Jan. 21, 2010 No petition for rehearing was accomplished pursuant to the rules. April 15, 2011, a pro-se Writ of Habeas

Corpus, was submitted to the U.S. Dist. Court of South Carolina, such accordingly was denied and dismissed on May 30, 2012.

In, applicant's second P.C.B. submitted and filed on March 22, 2013, made a couple of legitimate assertions, that was newly discovered, based on reasoning of such as to date, such

has yet to be officially dismissed, and is still yet pending based on a motion that petitioner submitted in opposition; petitioner while such was pending exaction and disposition of

case No. B-CP-11-0192, based on "good faith" effort of reasoning, Newly discovered evidence, Jurisdiction, and Ineffective assistance of Appellate counsel, submitted on Dec. 31, 2014 a Motion for a stipulated

dismissal without prejudice and/or such to be held in abeyance, to resubmit a subsequent (3rd) Third Post-Conv. Relief application, pursuant to statutory provisions of 17-27-45(B) and (C), of which the

"Successive Rule", is totally inapplicable here in the case at bar, based on such was not of maturity and ripe, and derived from the denial and dismissal of the Supreme Court Opinion decision.

Further, among other things [Inter-Alia], applicant points out to the fact, that he does in deed, also as a matter of Law, has a "liberty Interest," that is, and was created

by Federal, and State, and that through the convening of an "evidentiary hearing," that not only would such allow for the issues to be further and adequately developed on the record, but

that State would not be prejudiced, and such would be "in the best" interest of the Judicial economy," even as such follows):

Applicant, is currently being illegally detained in violation of the Laws and Constitution of the State, and of the U.S. by.

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BRANDY W. ROBE

"Issues Presented"

10a.) ("Newly discovered evidence"), The State lacked Jurisdiction, and procedurally defaulted applicant's claims).

10b.) Ineffective Assistance of Appellate Counsel.

10a.) ("Newly discovered evidence"), The State  
lacked Jurisdiction, and procedurally defaulted  
applicant's claims.

The applicant, in the herein case that's  
being placed before the bar, would contend  
the point, pursuant to rules and principles  
that the State (Appeal court),

Lacked Jurisdiction, and procedurally defaulted,  
the applicant's claims; by inappropriately, using a  
rule of the Appellate procedures, that was  
longer applicable and was reserved by

Supreme Court (State); being rule 224 SEARCH  
thus prejudicing the applicant, and defaulting  
applicant's claim, preventing applicant's Writ of  
Cert., from properly being filed, so that such

may be, "adjudicated," by a high court; see:  
Murray-Vs-Carrier; 106 S.Ct. 2661 (1986).

... "In Murray-Vs-Carrier, the sixth and  
fourteenth Amendment of the U.S. Constitution  
Mandates the State to bare the risk of  
Constitutionally defecient assistance of counsel  
Where a "procedural default is the result of -

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CLERK OF COURT  
SHERBEE COUNTY, S.C.  
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ineffective assistance of counsel, the sixth and fourteenth Amendment requires that responsibility for the default be imputed to the State".

In the current situation at hand, such procedural default, or Waiver was a direct result of inadvertance of Appellate Counsel, and State, for allowing such proceedings to illegally

transpire, when the State, and Counsel were fully aware of the circumstances, of an inapplicable rule, that was no longer in use, further it was held in Carpenter -vs- Wilkerson; 946 F. Supp. 522 (1996).

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"... (In Hoc Verba), The court has a duty to protect constitutional rights that cannot be written off as a mere matter of rote."

Clearly, the State, was in err, and lacked Jurisdiction to apply, a rule that was placed in reserve, by the higher court, further there were no statutory provision, to knowledge allowing for such. See: Exhibit (A) pg(s) 24 of 29 - 28 of 29

In conclusion, to the foregoing issue at hand, regarding and pertinent to Rules, principles, and Statutory provision, the applicant, cites and quotes: U.S. Vs. Timmericks; 441 U.S. 2085

"No legal; Law system can function without a rule of procedure conjoined with a rule of finality"

Clearly, it can be said of a certainty that such case is not final, based on the Totality of the surrounding facts and circumstances of reasoning. Last but not least, City of Columbia Vs. Weager

Fire Ins. Co.; 154 S.E.2d. 674 (1957).

"A court must not look to the, "phrasesology" of an isolated section or provision, but the language of the Statute as a whole considered in the light of its manifest purpose"

and Hodges V. Rainey; 533 S.E.2d. 578 (2000) a court must apply the plain meaning of a Statute where its language is unambiguous and conveys a clear meaning, simply.

Rules like Statutes, must be given Full, Force, and effect, and their plain meaning.

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CLERK OF COURT  
SHERBORN COUNTY, MASS.  
2015 APR 17 AM 11 22  
BY ANDY W. MCBEE

10b.) Ineffective assistance of Appellate Counsel;  
Furthermore, and in addition to the foregoing  
at hand, yet and still relevant to such,  
applicant contends that and state the facts,  
that by Appellate Counsel on motion to

Supplement record to the Writ of Certiorari,  
to the Supreme Court, knowingly using and  
allowing to be used, a rule, that was  
invalid and/or in abeyance, see Prohibitory (A),

pgs) 26 OF 29 - 28 OF 29, in that appellate Counsel  
did not; submit a motion before the courts by  
way of "Judicial Notice", to correct and/or  
rectify such erroneous dilemma, nor petitioned

the courts, for a Remand with instruction,  
See: Evitts vs. Lucey; 105 S.Ct. 830 ; which  
makes such binding on Counsel as a  
Mandatory duty; in conjunction with the sixth

and fourteenth Amendment of the U.S. Constitution  
in which clear and convincingly in the case at  
hand, that before the Bar Appellate Counsel  
negated such duty; and failed to assist, -

19 OF 29

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29 OF 40

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SHEROK COUNTY  
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BRANDY W. MOORE

effectively, and competently, as the Rules and principles dictate, by directing the court's attention to the fact of the matter that rule "224 SCACR", was reserved at

which time, it was erroneously used in applicant's case, [Inter-Alia], Among other things, pursuant to rule 407 CLD SCACR, under Cannon Rules of Conduct

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CLERK OF COURT  
CHEROKEE COUNTY, GA  
2015 MAR 17 09 11 22  
BRADY, M. HOBBE

ethics; applicant can reasonably infer that Appellate counsel's omission, in electing to not execute a motion to direct the court's attention regarding such, only showed

a conspiracy, Bent upon mischief of an "illegal tactical", advantage toward the State, based on appellant counsel's undue influence of omitting his duty to assist - again, just to

reiterate; and elaborate on U.S. -Vs. - Timmreck; 441 U.S. 2085;

" . . . No legal, Law system can function without a rule of procedure conjoined with a rule of finality.

Furthermore, and in addition to the foregoing Issues, Applicant views the point and contends, that the, "Successive Rule", is inapplicable, in the case at bar, that's being placed before,

this Honorable court; as such is arose from applicant's past prior "appeal", and was not maturity and/or ripe, stating; such validation had not occurred. In, such situation, and like

circumstance, applicant contends the point, that the Statutory provisions, of 17-27-45 (B) and (C) provides for, as well as 60(B) SCRP, for a subsequent Post-Conviction relief hearing; as

such may be as a result from a P.C.R. hearing, on Appeal, Newly discovered evidence, a Jurisdiction claim, or a New case law ruling or Statutory provision that provides for relief favorable to

the applicant, applicant states again, to reiterate and elaborate, [In Hoc Verba] and quote Land Vs. State; 262 S.E.2d. 735 (1980);

... "If an applicant can point to -

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BRANDY  
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MOBEE

"Sufficient Reasons", of what grounds were not raised or were not properly raised in a previous application, they may be raised in a subsequent application. "Land", suggests that

the successive rule cannot apply, unless the applicant had a fair and meaningful hearing on the merits in the first application, and that such is or was not procedurally defaulted by

P.C.R. counsel, and Appellate Counsel, further was held also in Case vs. State; 289 S.C. (1982):

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SHEROKEE COUNTY, S.C.  
MAR 19 11 20  
BRANDT W. JACBEE

"Unique Facts" may require a court to review successive applications on a "case by case basis."

Also in Tilley V. State; 511 S.E.2d. 689 (S.C. 1999);

... Successive post-conviction relief applications, are disfavored and the applicant has the burden to establish, that any new ground raised in a subsequent application could not have been raised by him in a previous application.

Applicant, in conclusion to all the fore going at hand, would state, that the Burden of proof is on the applicant to prove his allegations by a preponderance of the evidence, Rule 71.1(c) SCRCP;

Applicant contends, that the burden of proof has not only been shown, and met in the case at bar, before this court, but substantiated as well: See: Exhibit (A) ; pgs) 24 OF 29 - 28 OF 29.

Applicant submits that respondent (State), would not be prejudiced through an evidentiary hearing in this action.

Steven W. Little  
Steven W. Little John, 321946

Exhibit "A"

Rule 224 SCACR,

Inapplicable, based

On Reserved /

Erroneous motion submitted

past the statute of limitation

On Writ of Certiorari

FILED IN OFFICE OF  
CLERK OF COURT  
CHEROKEE COUNTY, S.C.  
2015 MAR 17 AM 11 20  
BRANDY W. MOBEE

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CLERK OF COURT  
CHEROKEE COUNTY, S.C.  
2015 JAN 23 AM 11 16  
BRANDY W. MOBEE  
**CLOCKED IN ERROR**

Exhibit "A"

State Of South Carolina  
County Of Cherokee

In The Court Of Common  
Pleas 7<sup>th</sup> Judicial Circuit

Steven W. Little John,  
applicant

C/A No. \_\_\_\_\_

-Vs-

Certificate

State Of South Carolina  
Responden

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~~CLERK OF COURT~~  
~~SOUTH CAROLINA~~  
~~CHEROKEE COUNTY~~  
~~BRANDY W. MCBEE~~  
~~AM 11 20~~  
~~AM 11 17~~  
~~AM 11 16~~  
**CLOCKED IN ERROR**

That I, Steven W Little John; Certify and swear  
under the penalty of perjury, that I have been  
on the following address below; on this 20 day of Jan,  
2015, for post-conv. relief, with cover sheet, Table of  
contents, mot. to appoint counsel, mot. to disclose disc.,  
memo. of law, exhibit, and cert. by depositing such in  
the Turbeville Corr. Inst. Mail room Office

Has sworn to and subscribed  
before me this 19<sup>th</sup> day of March ~~Jan~~ 2015

Steven Little John

Steven W. Little John; 321946  
Turbeville Corr. Inst.  
SA - 124  
Post Office Box 252  
Turbeville, South Carolina

E. W. Hart  
Notary

Exp: 4-27-2016

Orig: Hon. Brandy W. McBee,  
Clerk Of Court  
Post Office Drawer 2289  
Geaffney, South Carolina  
29342

**RECEIVED** 29/162

JAN 16 2015

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29 OF 29  
29 OF 29

March 18, 2016

Brandy McBee  
Clerk of Court, Cherokee County  
Post Office Drawer 2289  
Gaffney, So. Car. 29342

FILED IN THE OFFICE  
CLERK OF COURT  
2016 MAR 28 P 12: 59  
BRANDY W. MCBEE  
CHEROKEE COUNTY, SC

RE: Case Status Check

Dear Clerk,

Please provide me with the current to date status of these two Court of Common Pleas cases listed below:

- 1. Steven W. Littlejohn v. State of South Carolina  
# 013CP-110192 - Filed March 22, 2013  
Dismissed 5/12/15 Re-consider order affirmed 7/17/15  
Original dismissal 6/29/15
  - 2. Steven W. Littlejohn v. State of South Carolina  
# 2015-CP-11-0242 - Filed March 7, 2015  
Conditional Order of Dismissal filed 9/23/2015  
Rule 59E sent to AG on 10/21/15 - this will be scheduled
- Your assistance in this matter is greatly appreciated by the AG's office.

Respectfully Submitted,  
Steven W. Littlejohn  
Steven W. Littlejohn

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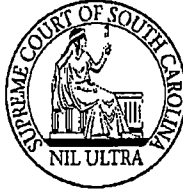
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MAR 22 2016  
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3/29/16

cc: File

Exhibit NO. 112



**South Carolina Court Administration**  
**South Carolina Supreme Court**  
**Columbia, South Carolina**

1220 SENATE STREET, SUITE 200  
COLUMBIA, SOUTH CAROLINA 29201

May 9, 2017

The Honorable Brandy W. McBee  
Cherokee County Clerk of Court  
PO Drawer 2289  
Gaffney, SC 29342-2289

RE: Steven W. Littlejohn #321946

Dear Clerk McBee:

Enclosed is a copy of a letter this office received from the above-referenced person. It would be appreciated if you would review this matter to assist him.

Sincerely,  
Court Services Section/ar

cc: Steven W. Littlejohn #321946  
Turbeville Correctional Institution  
SIA No. 124B  
Highway 378  
Turbeville, SC 29162

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MAY 12 2017  
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TURBEVILLE

Exhibit No. 13



# Cherokee County Clerk of Court Office

BRANDY W. MCBEE  
CLERK OF COURT

POST OFFICE DRAWER 2289  
125 E. FLOYD BAKER BLVD  
GAFFNEY, SC 29342  
PHONE: (864) 487-2571  
FAX: (864) 487-2754

June 16, 2017

Steven W. Littlejohn, #321946  
Turbeville Correctional Institution  
SIA No. 124B  
Highway 378  
Turbeville, SC 29162

In Re: 2015-CP-11-242

Mr. Littlejohn,

A copy of your documents are being returned to you unfiled pursuant to the Supreme Court Order, dated May 17, 2017.

Best Regards,

Common Pleas Clerk  
(864) 487-2571 (Tel)  
(864) 487-2754 (Fax)

Enc: Supreme Court Order

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CLERK OF COURT  
2017 JUN 16 P 4:44  
BRANDY W. MCBEE  
CHEROKEE COUNTY, SC

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JUN 20 2017  
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TURBEVILLE, SC

Exhibit NO. 14



# Cherokee County Clerk of Court Office

BRANDY W. MCBEE  
CLERK OF COURT

POST OFFICE DRAWER 2289  
125 E. FLOYD BAKER BLVD  
GAFFNEY, SC 29342  
PHONE: (864) 487-2571  
FAX: (864) 487-2754

June 16, 2017

Steven W. Littlejohn, #321946  
Turbeville Correctional Institution  
SIA No. 124B  
Highway 378  
Turbeville, SC 29162

In Re: 2015-CP-11-242

Mr. Littlejohn,

We received your Objections to the Proposed Final Order of Dismissal (dated June 8, 2017) on June 13, 2017. However, these objections/documents may not be filed in the circuit court as a result of the Supreme Court Order, dated May 17, 2017, which states "The request for leave to file a motion under Rule 52 of the South Carolina Rules of Civil Procedure with the circuit court is denied." This order was filed in the Clerk's Office May 19, 2017 and is enclosed with this notice for your reference.

Best Regards,

Common Pleas Clerk  
(864) 487-2571 (Tel)  
(864) 487-2754 (Fax)

Enc: Supreme Court Order

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CLERK OF COURT  
2017 JUN 16 P 2:58  
BRANDY W. MCBEE  
CHEROKEE COUNTY, SC

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JUN 20 2017

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TURBEVILLE

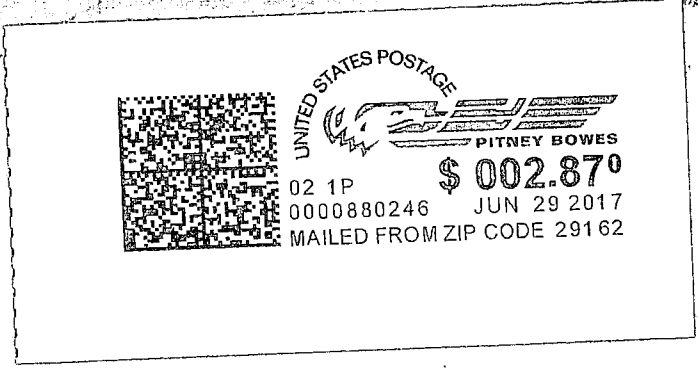
Exhibit No. 15

Phone No: 321946

0124B

Coker Hwy:

CA# 29162



RECEIVED

JUN 29 2017

MAIL ROOM  
COLUMBIA, SC

Daniel E. Shearouse, Clerk of Court  
 In The Supreme Court of South Carolina  
 Post Office Box 11330  
 Columbia, So. Car.

29211