

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
JUDGEMENT IN A CIVIL CASE

RECEIVED

DEC 01 2017

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Honorable Casey L. Manning, Circuit Court Judge

Case No. 2015-CP-40-02395
Appellate Case No. 2016-002268

Taliah K. Shabazz

Appellant,

v.

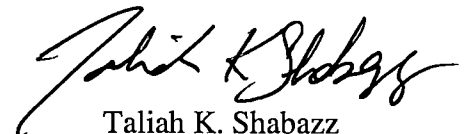
Bertha Rodriguez,

Respondant

APPELLATE RESPONSE TO MOTION TO DISMISS

The appellate appeals the motion to dismiss Appellate Case No. 2016-002268 for failure to prosecute. The respondent has noted the motions for extended time for the initial brief, the reply brief and the record of appeal has been extended as reasons to dismiss. The appellate is a pro se appellant and although there are resources to assist the appellate through the appeal process, there are still obstacles. The respondent is aware the pro se appellate has to work twice as hard as an attorney with a law background. The appellate does not have access to a

paralegal or appeals attorney to write briefs for her. The appellate is aware of the frustration the respondent is having to wait on submissions. The appellate shares that mutual frustration. The respondents reply brief was sent to nonexistent address along with proof of service. The appellant was unaware at the time, fortunately the respondent amended the document and resubmitted. However that caused time for the appellant. The appellate is aware that time has lapsed on record of appeal. As the respondent is aware, if the appellate is represented by an attorney, any copies that are printed are reimbursed to appellant. However that is not the case for a pro se appellate. Due to unforeseen circumstances the appellate faced financial difficulties. Fortunately the appellate was able finish the record of appeal and have it ready to submit to respondent and appeals court. The appellate apologies to the court of appeals for the lapse in time and for the inconvenience. The decision is with the appeals court on this matter and the appellate begs the court to dismiss motion to dismiss appeal.



Taliah K. Shabazz
6289 U. S Highway 321 S
Winnsboro, South Carolina, 29180
(803) 635-1457
Pro-se Appellant

Cc: Tammy Kitchens, Clerk of Court,
Allyce Bailey, Esquire

PROOF OF SERVICE

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
JUDGEMENT IN A CIVIL CASE

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Honorable Casey L. Manning, Circuit Court Judge

Case No. 2015-CP-40-02395
Appellate Case No. 2016-002268

RECEIVED

DEC 01 2017

SC Court of Appeals

Taliah K. Shabazz

Appellant,

v.

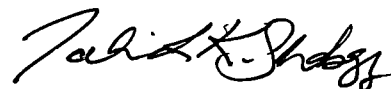
Bertha Rodriguez,

Respondant

PROOF OF SERVICE

I certify that I have served the initial briefs and record on appeal and appeal to motions to dismiss Appellate Case No. 2016-002268 Ms. Rodriguez's attorney of record, Allyce Bailey, Post Office Box 1473, Columbia South Carolina 29202, by depositing said materials in the United States Mail, postage prepaid, on December, 1 2017. I have also submitted these materials to Ms. Tammy Kitchens, the clerk of court.

December 1, 2017



Taliah K. Shabazz
6289 U. S Highway 321 S
Winnsboro, South Carolina, 29180
(803) 635-1457
Pro-se Appellant

Cc: Tammy Kitchens, Clerk of Court,
Allyce Bailey, Esquire