

The State Of South Carolina  
In The Court Of Appeals

---

**RECEIVED**

DEC 18 2017

SC Court of Appeals

Appeal From The Administrative Law Court

S. Philip Lenski, Administrative Law Judge

---

Lower Case No. 2017-ALJ-04-0434-AP

Appellate Case No. 2017-002215

---

Ronald L. Legg, . . . . . Appellant,

v.

South Carolina Dept. Of Corrections, . . . Respondent.

---

Motion For Objection To Motion To  
Dismiss Appeal As Moot

---

Now comes Ronald L. Legg, Appellant, to move  
this Honorable Court to hear this Motion For  
Objection To Respondent's Motion To Dismiss Appeal  
As Moot, and for Order to dismiss Respondent's Motion

To Dismiss.

Respondent's Motion To Dismiss Appeal As Moot should be dismissed because of Respondent's 'BAD FAITH' grounds, and redundancy of same motion on term of mootness.

Respondent makes a false claim for justification of mootness, by asserting argument with no sustainable factual basis, as Respondent states on page (2) of Motion To Dismiss Appeal As Moot, "In the instant case, Appellant, ultimately, seeks return of the good time he lost as a result of a disciplinary conviction in 2015." There is no factual basis for such an assertion, which does not comport with the facts in Appellant's issue of controversy and Appeal Brief. And Respondent further states, "However, Appellant was released from state custody on Dec. 1, 2017." And Respondent goes on to imply that Appellant's resolution is no longer possible,

because, "Granting additional work credits to Appellant is not possible because he has served his sentence. Therefore, the Court cannot grant Appellant the relief he seeks."

Respondent's claim as grounds for argument has no factual basis, and only serves as a purpose to deviate from Appellant's established record of the facts in the initial issue of controversy, and Appeal Brief, thereby, showing fraudulent device on behalf of Respondent for attempting to confuse the Court.

Respondent's grounds for argument are not legitimately subordinate to the facts Appellant has raised for adjudication on responsive accountability from Respondent. And Respondent's argument based upon 'BAD FAITH' should be imputed against any further delays for adjudication on Appellant's relief on Respondent's appropriate and just accountability, as opposed to redundancy in the

continuing attempts of distorting the issue for  
adjudication, and under the false application of the  
term mootness.

Respondent's Motion To Dismiss Appeal As  
Moot must be dismissed, and hearing of the merits  
of Appellant's Appeal Brief must be granted.

Dec. 9, 2017.

Respectfully Submitted



Ronald L. Legg  
787 Upson St. # 4  
Akron, Ohio 44305

(4)

The State Of South Carolina  
In The Court Of Appeals

---

**RECEIVED**

DEC 18 2017

SC Court of Appeals

Appeal From The Administrative Law Court  
S. Philip Lenski, Administrative Law Judge

---

Lower Case No. 2017-ALS-04-0434-AP

Appellate Case No. 2017-002215

---

Ronald L. Legg, ..... Appellant,

✓.

South Carolina Dept. Of Corrections, .. Respondent


---

Certificate Of Service

---

I hereby certify that on December 9, 2017, I served a copy of the foregoing Motion For Objection To Motion To Dismiss Appeal As Moot, upon Respondent by depositing a copy of same in the United States Mail, addressed to the South Carolina Department Of Corrections, Office Of General Counsel, Melissa J. Arnold, 4444 Broad River Rd. Columbia, S.C. 29221.

Dec. 9, 2017

  
Ronald L. Legg  
787 Upson St. # 4  
Akron, Ohio 44305

Ronald L. Legg  
787 Upson St. #4  
Akron, Ohio 44305

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

**RECEIVED**

DEC 18 2017

Dec. 9, 2017

SC Court of Appeals

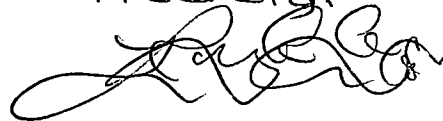
Re: App. Case No. 2017-002215 (Ronald L. Legg v.  
South Carolina Dept. of Corrections).

Dear Ms Kitchings:

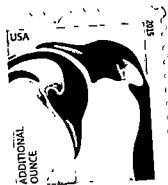
Enclosed herein, please find:

Appellant's Motion For Objection To Motion  
To Dismiss Appeal As Moot, and Certificate of  
Service on Respondent.

Sincerely,



Ronald L. Legg  
787 Upson St. # 4  
Akron, Ohio 44305



**RECEIVED**

DEC 18 2017

SC Court of Appeals

South Carolina Court of Appeals  
Jenny Abbott Kitchings Clerk  
P.O. Box 11629  
Columbia, S.C. 29211

2921181629 8012

