

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM Horry COUNTY
COURT OF COMMON PLEAS

RECEIVED
DEC 29 2017
SC Court of Appeals

BENJAMIN H. CULBERTSON, CIRCUIT COURT JUDGE
APPELLATE CASE NO. 2017-001381

RICHARD B. LAMB

APPELLANT

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STATE OF SOUTH CAROLINA DMV.
OFFICE OF GENERAL COUNSEL

RESPONDENT

REPLY TO RESPONDENTS ANSWER OF
MOTION TO COMPEL INDICMENT AND
PROSECUTION

APPELLANT HAS PUT PREMA FACIA EVIDENCE
BEFORE THIS COURT IN THE FORM OF FR-4
FORM, NOTICE, DOCUMENT, INSTRUMENT,
THAT RESPONDENTS ADMITTED IN A SWORN
AFFIDAVIT THAT IT DID NOT CONTAIN TRUTHFUL
FACTS AND DID NOT COMPLY WITH LAWFULLY
MANDATED, STATUTORILY MANDATED OPPORTUNITY
TO RESPOND, ADMITTANCE OF GUILT LINES
5, 6, 7 OF RESPONDENTS AFFIDAVIT.

APPELLANTS BELIEF IS THIS HONORABLE COURT HAS AUTHORITY / JURISDICTION TO RULE ON THIS MOTION. § 14-8-290

POWERS OF JUDGE AT CHAMBERS GIVES JURISDICTION FOR INTERLOCUTORY WRITS

RESPONDENTS HAVE CITED § 14-8-200 WHICH REFERENCES § 14-8-260 WHICH LISTS THE ONLY LIMITATIONS TO JURISDICTION AND AN INTERLOCUTORY WRIT OF MOTION TO COMPEL IS ~~NOT~~ LISTED AS A LIMITATION. HOWEVER IF THIS HONORABLE COURT WERE TO SIDE WITH THE RESPONDENTS, APPELLANT WOULD WHOLE HEARTEDLY SUPPORT THE APPLICATION OF § 14-8-260 THAT MAKES THIS MATTER AND CASE TRANSFERRED TO THE SOUTH CAROLINA SUPREME COURT AND THAT WOULD FOLLOW § 14-8-260, § 14-8-210 AND SCACR 204.

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RICHARD B. LAMB
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MYRTLE BEACH, SC 29572
843-516-0468
PRO SE

DECEMBER 27, 2017

Richard B Lamb

DOUGLAS C. BAXTER
P.O. BOX 3646
MYRTLE BEACH, SC 29578
843-448-1008

ATTORNEY FOR RESPONDENT

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STATE OF SOUTH CAROLINA DMV.
OFFICE OF GENERAL COUNSEL

RESPONDENT

PROOF OF SERVICE

I CERTIFY THAT I HAVE SERVED A COPY OF
REPLY TO RESPONDENTS ANSWER TO MOTION
TO COMPEL INDICMENT DATED DECEMBER 27,
2017 ON RESPONDENTS STATE OF SOUTH CAROLINA
D.M.V. OFFICE OF GENERAL COUNSEL BY PERSONALLY
DEPOSITING IT IN THE UNITED STATES MAIL,
PROPER POSTAGE ATTACHED, CERTIFIED RETURNED
RECEIPT TO RESPONDENTS COUNSEL DOUGLAS C.
BAXTER AT P.O. BOX 3646, MYRTLE BEACH, SC 29578
THIS DAY DECEMBER 27, 2017

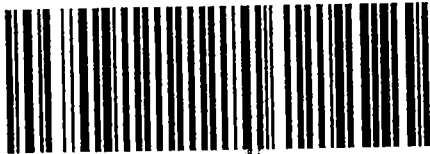
DECEMBER 27, 2017

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7017 2400 0000 1764 0045



1024



29211

U.S. POSTAGE
PAID
MYRTLE BEACH, SC
29572
DEC 27 17
AMOUNT

\$12.75

R2304N117042-13

FROM: RICHARD B. LAMB
954 MAISON CT
MYRTLE BEACH, SC
29572

TO:

SC. COURT OF APPEALS
JENNY ABBOTT KITCHINGS, CLERK
P.O. BOX 11629
COLUMBIA, SC 29211