

BEFORE THE SUPREME COURT OF SOUTH CAROLINA
Appellate Cases Nos. 2015-000941 and 2015-002401

APPEALS from RICHLAND COUNTY Court of Common Pleas, Alison Renée Lee, Circuit Judge
Circuit Court Case No. 2013-CP-40-03522
AND ORANGE COUNTY Court of General Sessions, Diane Goodstein, Circuit Judge,

City of Columbia, South Carolina,

Respondent,

v.
Marie-Thérèse Assa'ad-Faltas, MD, MPH,

Appellant.

AND
State of South Carolina, Respondent/Petitioner

v.
Lamont Antonio Samuel, Appellant/Respondent

RECEIVED

MAR 16 2018

Dr. Assa'ad-Faltas' EMERGENCY Motion to Appoint Counsel for Her
To Move to Reopen This Court's Decision in her Case in Light of Samuel
OR TO File an Amicus in Rehearing of Samuel To Reconcile the Two Irreconcilable Decisions

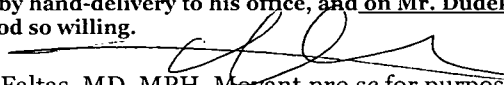
S.C. SUPREME COURT

Dr. Assa'ad-Faltas agrees with the State's Petition for Rehearing, filed in *State v. Samuel* on 15 March 2018, in only three aspects: (1) *Samuel* IS IRRECONCILABLE with *Assa'ad-Faltas*; (2) even the *Samuel* dissent, who presumably authored *Assa'ad-Faltas*, does not mention *Assa'ad-Faltas*; and (3) one wonders what the result would have been in the absence of recusals (Justice Few in *Samuel* and Chief Justice Beatty and Retired Chief Justice Pleicones in *Assa'ad-Faltas*.)

Dr. Assa'ad-Faltas, of course, believes that her case was wrongly decided but that *Samuel* was correctly decided and has an undeniable interest in a rehearing of *Samuel* to overrule *Assa'ad-Faltas*. Were Dr. Assa'ad-Faltas to expound on the grounds for her belief, this Court might aggravate its oppression of her and not even consider this motion under false pretext that it went beyond the relief sought in the motion. Were Dr. Faltas to not explain her grounds, this Court would deny this motion under false pretext that it did not give good cause to be granted. So, Dr. Assa'ad-Faltas simply states that, absent a rehearing of *Samuel* so as to overrule *Assa'ad-Faltas*, reasonable observers of this Court now and the future would conclude that it is not the law which guides this Court but the identity of parties to a case of the jurists deciding it.

WHEREFORE, counsel should be immediately appointed to timely submit to this Court a brief to reconcile *Samuel* with *Assa'ad-Faltas* by overruling *Assa'ad-Faltas* because the State's "Motion for a Limited Remand" puts Lamont Antonio Samuel in charge of an important principle of law, Constitution, and equal protection in South Carolina, which *Samuel* MIGHT use to his personal advantage and let the law remain in a shamefully unbalanced state.

Submitted on 16 March 2018 and served by personal delivery of a copy hereof to the City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina, 29201, on SC's Attorney General by hand-delivery to his office, and on Mr. Dudek at his office at 1331 Lady Street, Columbia, SC 29201, all God so willing.


Marie-Thérèse Assa'ad-Faltas, MD, MPH, Movant pro se for purposes of this motion

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