

State of South Carolina

Vincent Rice # 214178

Appellant

vs

S.C. Department of Correction

Respondents

In the S.C. Court of Appeals

case # 2017-061484

RECEIVED

JUN 05 2018

SC Court of Appeals

Motion to dismiss

Respondent's move to
strike Final Brief,

The Appellant, is compelled to file this motion pro-se in the interest of his personal right to freedom along with the interest of justice. Thus the Respondents motion must be dismissed as an obstruction of justice. for the following reasons:

- 1.) The Respondents delayed this appeal for the Appellant's freedom/liberty, by requesting documents they possess and control at all times; then mailed appellant the same documents "after" the deadline.
- 2.) The Appellant is currently held in "unlawful" custody and "seizure" by the Respondents, due to several staff members actions within SDC.
- 3.) The Respondents have been allowed to avoid answering valid claims within the initial brief and has been allowed to divert the "subject matter" arguments and claim allegations, while delaying the case for frivolous and futile documents.
- 4.) Respondent, Annie Runkler refused to reply to Appellant's amended initial brief, and have no merit to enforce procedures being they are the Assailants, and has curtailed the court and laws of the land throughout the entire appeal for remedies.
- 5.) Appellant is within the total control of Respondent's, they have willfully and fatidfully deprived Appellant of law library access for more than (40+) days. Appellant was forced to write his final brief to the best of his knowledge due to the Respondents devised burdens.

6.) Appellant received the court's order via postal mail on April 2, 2018, and complied on May 2, 2018.

* It should be noted Respondent, Annie Rumber did miss a (110) deadline in the Lower Court, and admitted a careless mistake. But now she uses the law not as equal protection but as a sword for my stumbling in this race for my liberty. (See Attachment)

7.) Upon information, belief and supposedly evidence, Appellant has reason to believe Judges have not issued orders this entire case. None of the orders, have conclusions of law, and reasons for findings. This is because the case file merger at the court along with, other assistance ~~are~~ fabricating the orders; This is how the Respondent's intend to overwhelm Appellant; with the Agency and Judicial Dept's power to create documents

In conclusion, The Respondent's relief motion is an obstruction to justice, it must be dismissed and a fair ruling of Appellant's relief of "Detainment without fair due process 14. Amendments

Respectfully ~~Submitted~~



Appellant

L.C.1
P.O. Box 205
Ridgeville, S.C. 29472

Proof of Service

I Vincent Rice did forward a hand written copy of a Motion to Dismiss Respondents Request to the following address by placing in postal mail on May 30, 2018.

Annie Resnik
General Counsel for Respondent
4444 Broad River Rd
Columbia, SC 29212

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Vincent Rice
L.C. 1
P.O. Box 205
Ridgelyville, S.C.

Court of Appeals
Clerk of Court
1220 Senate St
Columbia S.C. 29201

SCDC

JUN 30 2018

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