

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas  
William H. Seals, Jr. Circuit Court Judge

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Civil Action No: 2016-CP-28-00583  
Appellant Case No: 2017-002514

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**RECEIVED**

SEP 25 2018

SC Court of Appeals

James Teal \_\_\_\_\_ Appellant

V.

Edwards Telecommunications, Inc. and Leroy Smith, Director of the Dep't of Public Safety, Defendants, of which Leroy Smith, Director of the Dep't of Public Safety is the \_\_\_\_\_ Respondent.

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APPELLANTS RESPONSE TO RESPONDENTS RETURN TO APPELLANTS MOTION FOR APPELLANTS MEDICAL RECORDS TO BE ACCEPTED FOR APPELLANTS RECORD ON APPEAL

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Counsel for Respondent is steadfast wanting Appellants case dismissed, for counsel knows, Respondent will not win this case with a return to the lower Court. Appellants case is not just for Appellant, but is also for the people and visitors traveling South Carolina roadways. The sovereignty and safety of all travelers on South Carolina roadways are in imminent peril, with Appellants case being dismissed, by way of a plain error by Appellant, outlined by counsel for Respondent.

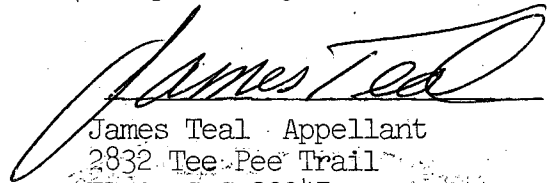
Appellants medical documents are precise and of professional analysis and are critical for the Court to analyze, Appellants appeal.

Respondent violating and ignoring Statutes of law safeguarding travelers on South Carolina roadways, created all of the confusion and actions taken by Appellant.

With a dismissal of Appellants case the Honorable Court will be dismissing the sovereignty and safety of all travelers on South Carolina roadways.

Appellants case will prove there is another side of the coin in the dangerous work zones that are killing and injuring thousands every year. The Lady of Justice needs her blindfold loosened to see the truth Respondent is attempting to hide from the Honorable Court and the people!

Respectfully Submitted



James Teal Appellant  
2832 Tee Pee Trail  
Elgin, S.C. 29045  
(803) 457-5820

Date September 24-2018

Pete Balthazor, Esquire

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CERTIFICATE OF SERVICE

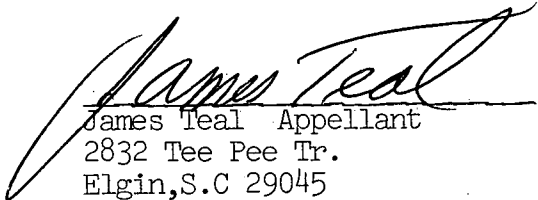
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HAND DELIVERY:

I certify that I have served Respondent, the Appellants Response to  
Respondents Return to Appellants Motion for Appellants medical documents  
to be accepted and to be included in Appellants Record on Appeal, to the  
below named party.

Pete Balthazor, Esquire  
2838 Devine St.  
Columbia, S.C 29205  
(803)-799-9993

Date September 24-2018

  
James Teal Appellant  
2832 Tee Pee Tr.  
Elgin, S.C 29045  
(803)-457-5820