

THE STATE OF SOUTH CAROLINA  
Court of Appeals  
2017-001831

**RECEIVED**  
SEP 26 2018  
SC Court of Appeals

APPEAL FROM LAURENS COUNTY  
Frank R Addy Jr., Circuit Court Judge  
Civil action CP 2017 CP30- 008

Mosi A. Bundu And Malcolm DJ Watts.....Appellants

Ricky Chaistain, County Sheriffs Dept  
Socrotes Ledda City Police Chief  
Sgt, Michael Gainey and Logan Kanipe City police.....Respondents  
All of Laurens County

Russell W. Harter, Jr. Attorney of record for the County  
Logan Jolly Attorney of record for the city both of Laurens County

RECORD ON APPEAL

Mosi A Bundu  
206B Mock Street  
Laurens SC 29360  
864-401-0333

Pro Se

*Mosi A Bundu*

Malcolm DJ Watts  
1805 Curry Road  
Laurens Sc 29360

*Malcolm DJ Watts*

## Record Of Appeal Index

- 1) State Of SC Court Of Appeal Record of Appeal Cover page.
- 2) Proof of service letter.
- 3) Civil action filing cover sheet and "Summons and Complaint
- 4) Docket/ notice of motion schedule hearing for July1. 2017
- 5) Docket notice of motion scheduling hearing for August 1, 2017
- 6) July 1.2017 judgment in civil case ruling letter.
- 7) August 1. 2017 judgment in civil case ruling letter
- 8) Green card/signature proof of service letters entered into the record of lower court
- 9) Rule 209 designation of matter which 210 indicated plaintiffs could resubmit.
- 10) Addendum to designation of matter for record of appeal.
- 11) An amended answer from one of the attorneys of record, we could agree that Mr. Harter both sent such answers along with interrogatories.

8/25/2018

This letter is proof of service by USPS mail of Laurens SC. 29360 of record of appeal to the attorneys of record for the County and City police of Lauren; Russell W. Harter Jr. 14 Lavinia Avenue Greenville SC 29601 for the County and Logan Jolly 1805 N. Boulevard, Anderson, SC 29621.

Mosi A. Bundu  
206B Mock Street  
Laurens, SC 29306

**RECEIVED**  
SEP 26 2018  
SC Court of Appeals

STATE OF SOUTH CAROLINA

COUNTY OF Laurens

Mrs. Brenda & Malcolm D.J. Watts  
Plaintiff(s)

Rickey Chertani vs. Sheriff Dept - Socrales Fedde City Police Chief Sgt Michael Gauchy & Logan Kanipe  
Defendant(s)

Submitted By: Mrs. Brenda  
Address: 206 B Mack St  
Laurens S.C. 29360

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2017 **CP30-008**  
-CP-

SC Bar #: Pro se  
Telephone #: 864-401-0333  
Fax #: \_\_\_\_\_  
Other: \_\_\_\_\_  
E-mail: \_\_\_\_\_

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

**DOCKETING INFORMATION (Check all that apply)**

\*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint.
- NON-JURY TRIAL demanded in complaint.
- This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Proof of ADR/Exemption Attached)

**NATURE OF ACTION (Check One Box Below)**

- |  |   |  |  |
|--|---|--|--|
| <p><b>Contracts</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Constructions (100)</li> <li><input type="checkbox"/> Debt Collection (110)</li> <li><input type="checkbox"/> General (130)</li> <li><input type="checkbox"/> Breach of Contract (140)</li> <li><input type="checkbox"/> Fraud/Bad Faith (150)</li> <li><input type="checkbox"/> Failure to Deliver/Warranty (160)</li> <li><input type="checkbox"/> Employment Discrim (170)</li> <li><input type="checkbox"/> Employment (180)</li> <li><input type="checkbox"/> Other (199)</li> </ul> <p><b>Inmate Petitions</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> PCR (500)</li> <li><input type="checkbox"/> Mandamus (520)</li> <li><input type="checkbox"/> Habeas Corpus (530)</li> <li><input type="checkbox"/> Other (599)</li> </ul> <p><b>Special/Complex /Other</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Environmental (600)</li> <li><input type="checkbox"/> Automobile Arb. (610)</li> <li><input type="checkbox"/> Medical (620)</li> <li><input type="checkbox"/> Other (699)</li> <li><input type="checkbox"/> Sexual Predator (510)</li> <li><input type="checkbox"/> Permanent Restraining Order (680)</li> </ul> | <p><b>Torts - Professional Malpractice</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Dental Malpractice (200)</li> <li><input type="checkbox"/> Legal Malpractice (210)</li> <li><input type="checkbox"/> Medical Malpractice (220)</li> <li>Previous Notice of Intent Case #<br/>20 <u>-NI-</u></li> <li><input type="checkbox"/> Notice/ File Med Mal (230)</li> <li><input type="checkbox"/> Other (299)</li> </ul> <p><b>Administrative Law/Relief</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Reinstate Drv. License (800)</li> <li><input type="checkbox"/> Judicial Review (810)</li> <li><input type="checkbox"/> Relief (820)</li> <li><input type="checkbox"/> Permanent Injunction (830)</li> <li><input type="checkbox"/> Forfeiture-Petition (840)</li> <li><input type="checkbox"/> Forfeiture-Consent Order (850)</li> <li><input type="checkbox"/> Other (899)</li> </ul> | <p><b>Torts - Personal Injury</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Conversion (310)</li> <li><input type="checkbox"/> Motor Vehicle Accident (320)</li> <li><input type="checkbox"/> Premises Liability (330)</li> <li><input type="checkbox"/> Products Liability (340)</li> <li><input checked="" type="checkbox"/> Personal Injury (350)</li> <li><input type="checkbox"/> Wrongful Death (360)</li> <li><input type="checkbox"/> Assault/Battery (370)</li> <li><input type="checkbox"/> Slander/Label (380)</li> <li><input type="checkbox"/> Other (399)</li> </ul> <p><b>Judgments/Settlements</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Death Settlement (700)</li> <li><input type="checkbox"/> Foreign Judgment (710)</li> <li><input type="checkbox"/> Magistrate's Judgment (720)</li> <li><input type="checkbox"/> Minor Settlement (730)</li> <li><input type="checkbox"/> Transcript Judgment (740)</li> <li><input type="checkbox"/> Lis Pendens (750)</li> <li><input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)</li> <li><input type="checkbox"/> Confession of Judgment (770)</li> <li><input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)</li> <li><input type="checkbox"/> Other (799)</li> </ul> | <p><b>Real Property</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Claim &amp; Delivery (400)</li> <li><input type="checkbox"/> Condemnation (410)</li> <li><input type="checkbox"/> Foreclosure (420)</li> <li><input type="checkbox"/> Mechanic's Lien (430)</li> <li><input type="checkbox"/> Partition (440)</li> <li><input type="checkbox"/> Possession (450)</li> <li><input type="checkbox"/> Building Code Violation (460)</li> <li><input type="checkbox"/> Other (499)</li> </ul> <p><b>Appeals</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Arbitration (900)</li> <li><input type="checkbox"/> Magistrate-Civil (910)</li> <li><input type="checkbox"/> Magistrate-Criminal (920)</li> <li><input type="checkbox"/> Municipal (930)</li> <li><input type="checkbox"/> Probate Court (940)</li> <li><input type="checkbox"/> SCDOT (950)</li> <li><input type="checkbox"/> Worker's Comp (960)</li> <li><input type="checkbox"/> Zoning Board (970)</li> <li><input type="checkbox"/> Public Service Comm. (990)</li> <li><input type="checkbox"/> Employment Security Comm (991)</li> <li><input type="checkbox"/> Other (999)</li> </ul> |
|--|---|--|--|

LAURENS COUNTY CLERK OF COURTS  
2017 JAN - 14  
LYNN WILANCASTER

Submitting Party Signature: Mrs. Brenda

Date: 01/04/17

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCF, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

STATE OF SOUTH CAROLINA

COURT OF COMMON PLEAS  
EIGHTH CIRCUIT

COUNTY OF: Laurens SC

Mosi A Bundu; Malcolm D.J Watts

PLAINTIFFS

206B Mock Street and 1935 Curry Road

STREET ADDRESSES SUMMONS &  
COMPLAINT

Both in Laurens SC 29360

864-401-0333 Bundu and 864-923-3530 Watts

TELEPHONES

Sheriffs Dept. Laurens: SC Ricky W Chaistain; Sgt Michael Gainey  
And officer Kanipe (city) 201 W. Main St Laurens SC 29360

274 Cedar Grove Rd. Ricky Chaistain; County officers 216 W.  
Main Street Laurens SC 29360

ADDRESSES

City Police Dept: Socrates D. Ledda; possible John Doe (s)  
201 West Main Street Laurens SC 29360

864-984-4967 County and 864-984-3532 city

TELEPHONES

LAURENS COUNTY  
CLERK OF COURT

2017 JAN -4 A 11:59

LYNN W. LANCASTER

We, the plaintiffs in this civil action do make the following claims:

That the city responded to what they described as a "911 hangup from a verizon (9116436081) number, with GPS placing the call at 200 Mock Street"  
"Approximately 1 sic after being on the scene Before making contact with 200 mock street, Sgt. Gainey and PTL Kanipe heard a gunshot in the immediate area" The county claims that they were there in support of the city. We believe that 206B was entered and searched without cause and unlawfully when no other places were entered on the report, which caused tremendous trauma to Malcolm DJ Watts and Mosi A. Bundu. No one on mock street said a gunshot was heard or fired, not at 200 mock street or to the left or right of 206B mock street.

We, believe that the defendants are residents / work in Laurens county which is in the jurisdiction of this county and makes this complaint properly filed in Laurens County.

We, make the complaint on the following that it no other residence was surrounded and entered unlawfully. At the time Mosi A, Bundu had a civil suit against the county which may have been motivation for singling 206B out.

L

We believe that, because of the above information and a settled case where officers entered a school based on an assumption of drugs with guns and dogs unlawfully searching and traumatizing students, that we are entitled to request a judgment of 750,000 and punitive damages. Including any cost relating to this action.

We, state under penalty of perjury that the above is correct and truthful. Except, those based on our information and belief.

Dated 01/04/17

01/04/17  
Date

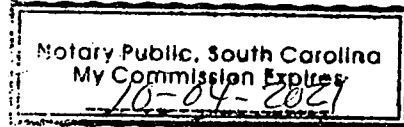
Based on SCCA/701 (Amended 05/08)



*Ms. Brenda Marie Wade*

Signatures of plaintiffs

*Dandia Newlon*  
Notary



NOTICE OF MOTION SCHEDULING

April 18, 2017



Motion "MDISMS - Motion/Dismiss" for Case: 2017CP3000008 - Mosi Bundu , plaintiff, et al VS Ricky Chastain, As Laurens County Sheriff , defendant, et al has been added to the following Motions Roster:

38 - Motions/Non-Jury Trials

This hearing of this motion has been scheduled for 6/1/2017 at 9:30 AM.

HEARINGS WILL BE HELD IN COURTROOM L-9 LOCATED AT LAURENS COUNTY JUDICIAL CENTER, 100 HILLCREST SQUARE, LAURENS, SOUTH CAROLINA. PLEASE ADVISE ASAP IF A MOTION/TRIAL IS RESOLVED. MOVING PARTY IS RESPONSIBLE FOR NOTIFYING ALL NECESSARY PARTIES.

Mail Notice To:

Mosi Bundu  
206B Mock Street  
Laurens, SC 29360

Court Info:

Common Pleas  
100 Hillcrest Square  
P.O. Box 287  
Laurens, SC 29360-9360

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(864)984-3538

Respectfully,

Lynn Lancaster  
Clerk of Court

A TRUE COPY OF ORIGINAL

A handwritten signature in cursive script that reads "Lynn W. Lancaster".  
Lynn W. Lancaster  
Laurens County CCCP & GS

NOTICE OF MOTION SCHEDULING

STATE OF  
SOUTH CAROLINA

June 20, 2017



Motion "MVACAT - Motion/Vacate" for Case: 2017CP3000008 - Mosi Bundu , plaintiff, et al VS Ricky Chastain, As Laurens County Sheriff , defendant, et al has been added to the following Motions Roster:

39 - Non-Jury Motions/Trials

This hearing of this motion has been scheduled for 8/1/2017 at 9:30 AM.

HEARINGS WILL BE HELD IN COURTROOM L-9 LOCATED AT LAURENS COUNTY JUDICIAL CENTER, 100 HILLCREST SQUARE, LAURENS, SOUTH CAROLINA. PLEASE ADVISE ASAP IF A MOTION/TRIAL IS RESOLVED. MOVING PARTY IS RESPONSIBLE FOR NOTIFYING ALL NECESSARY PARTIES.

Mail Notice To:

Mosi Bundu  
206B Mock Street  
Laurens, SC 29360

Court Info:

Common Pleas  
100 Hillcrest Square  
P.O. Box 287  
Laurens, SC 29360-9360

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(864)984-3538

Respectfully,

Lynn Lancaster  
Clerk of Court

A TRUE COPY OF ORIGINAL

*Lynn W. Lancaster*  
Lynn W. Lancaster  
Laurens County CCCP & GS

STATE OF SOUTH CAROLINA  
COUNTY OF LAURENS  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE  
CASE NUMBER 2017CP3000008

Most Bundu	Malcolm DJ Watts	Ricky Chastain, As Laurens County Sheriff Michael Gainey Socrates D Ledda, as Laurens City Police Chief John Doe (s)	Laurens County Sheriffs Department Logan Kinipe Laurens City Police Department
------------	------------------	---	--

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:	Attorney for: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Self-Represented Litigant
---------------	---

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.  See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):
  - Rule 12(b), SCRPC; (12)(b)(6)
  - Rule 41(a), SCRPC (Vol. Non-Suit);
  - Rule 43(k), SCRPC (Settled);
  - Other: \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):
  - Rule 40(j) SCRPC;
  - Bankruptcy;
  - Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
  - Other: \_\_\_\_\_
- STAYED DUE TO BANKRUPTCY
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):
  - Affirmed;
  - Reversed;
  - Remanded;
  - Other:

LAURENS COUNTY  
 CLERK OF COURT  
 2017 JUN - 12 12:43  
 LYNN L. LAUGHLIN

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order; (formal order to follow)  Statement of Judgment by the Court:

ORDER INFORMATION

This order  ends  does not end the case.  
Additional Information for the Clerk: \_\_\_\_\_

INFORMATION FOR THE JUDGMENT INDEX

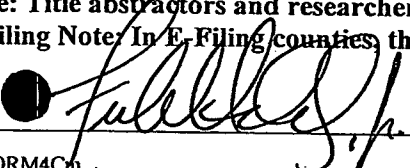
Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.



2159

06/01/2017

Circuit Court Judge

Judge Code

Date

**For Clerk of Court Office Use Only**

This judgment was entered on , and a copy mailed first class or placed in the appropriate attorney's box on , to attorneys of record or to parties (when appearing pro se) as follows:

Mosi Bundu 206B Mock Street Laurens, SC 29360

James D. Jolly Jr. PO Box 259 Anderson, SC 29622  
Russell W. Harter Jr. PO Box 10224 Greenville, SC 29603

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter- Tara Scott

Lynn Lancaster - Clerk of Court

Court Reporter:

**E-Filing Note:** In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

**ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.**

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

Case is dismissed for failure to state a cause of action and no summons was ever served in connection with the case.

Mosi A. Bundu

Ricky Chastain, as Laurens County Sheriff, et al.

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for :  Plaintiff  Defendant  
 or  
 Self-Represented Litigant

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
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- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order (formal order to follow)  Statement of Judgment by the Court:

**ORDER INFORMATION**

This order  ends  does not end the case.  
 Additional Information for the Clerk :

LYNN W. LANCASTER  
 CLERK OF COURT  
 LAURENS COUNTY  
 TRIBUNAL  
 2017 AUG -2 PM 3:08

**INFORMATION FOR THE JUDGMENT INDEX**

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

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Circuit Court Judge

2159  
 Judge Code

8/01/2017  
 Date

Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

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AGENCY I.D.  
SC0300100

LAURENS POLICE DEPARTMENT  
INCIDENT REPORT

CASE NUMBER

2015-0060

NCIC  
INQ. ENTD.

INCIDENT TYPE				COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM
911 - 911 HANG UP CALL				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	20		<input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Inst. <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input checked="" type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.
3.				<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			

INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)  
200 MOCK ST, LAURENS SC

ZIP CODE: 29360 WEAPON TYPE:

INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME 24 HR. CLOCK			LOCATION NO.
01/05/2015	0046		01/05/2015	0111	DISP. DATE	DISP. TIME	TIME ARRIVED	DEPART. TIME
					01/05/2015	0046	0052	0111

COMPLAINANT'S NAME (LAST, FIRST, MIDDLE): CENTRAL DISPATCH

RELATIONSHIP TO SUBJECT: ST

RESIDENT: JSOU RACE: SEX: AGE: ETH: DAYTIME PHONE: (864) 984-0812 EVENING PHONE:

ADDRESS: 321 S HARPER ST CITY: LAURENS STATE: SC ZIP CODE: 29360 LOCATION NO.: 03

VICTIM'S NAME (LAST, FIRST, MIDDLE): SOCIETY PUBLIC

RELATIONSHIP TO SUBJECT:

RESIDENT: JSOU RACE: SEX: AGE: ETH: DAYTIME PHONE: EVENING PHONE:

HEIGHT: WEIGHT: HAIR: EYES: FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.

ADDRESS: CITY: STATE: ZIP CODE: LOCATION NO.:

VISIBLE INJURY (VICT. 1)  YES  NO EXPLAIN -

VICTIM (NO. 1) USING: ALCOHOL:  YES  NO  UNK. DRUGS:  YES  NO  UNK.

TWO-MAN VEH.  ONE-MAN VEH.  DETECTIVE/SPLASMT.  OTHER  ALONE  ASSISTED

J - This Jurisdiction S - State O - Out of State U - Unknown

SUSPECT SUBJECT NAME (LAST, FIRST, MIDDLE): PERSON, UNKNOWN/UNTRACKED

RACE: U SEX: U AGE: 00 ETH: U DATE OF BIRTH: HEIGHT: WEIGHT: HAIR: EYES:

FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.

ADDRESS: CITY: STATE: ZIP CODE: LOCATION NO.:

SUBJECT (NO. 1) USING: ALCOHOL:  YES  NO  UNK. ARRESTED NEAR OFFENSE SCENE:  YES  NO

DATE/TIME OF OFFENSE: 01/05/2015 0046 DATE/TIME OF ARREST:

DRUGS:  YES  NO  UNK. TYPE: TOTAL # ARRESTED: 0

Offenses:  
911 HANG UP CALL

ON JANUARY 5, 2015 SGT. GAINY RESPONDED TO 200 MOCK STREET IN THE CITY LIMITS OF LAURENS. LAW ENFORCEMENT WAS DISPATCHED TO THE AREA IN REFERENCE TO A 911 HANGUP. CENTRAL DISPATCH ADVISED THAT THE PHONE WAS A 911 ONLY PHONE FROM VERIZON (9116436081). CENTRAL DISPATCH ADVISED THE CALLER AT 200 MOCK STREET. APPROXIMATELY 1 AFTER BEING ON SCENE BEFORE MAKING CONTACT WITH THE OCCUPANTS AT 200 MOCK STREET. SGT. GAINY AND OFFICER KANIPE HEARD A GUNSHOT IN THE IMMEDIATE AREA. OFFICERS BELIEVED THE SHOT CAME FROM BEHIND THE RESIDENCE AT 206 MOCK STREET. SGT. GAINY REQUESTED MORE UNITS TO RESPOND AND SGT. GAINY AND PTL. KANIPE ATTEMPTED TO LOCATE THE SHOOTER. OFFICERS MADE CONTACT WITH THE RESIDENCE AT 206 AND 208 MOCK STREET AS WELL AS 131 AND 133 LEE STREET. OFFICERS WERE NOT ABLE TO LOCATE THE SHOOTER OR ANY SHELL CASINGS. THIS INCIDENT IS PENDING FURTHER INVESTIGATION.

Date Entered: 01/05/2015 02:36:23 AM  
Print Date: 01/13/2015 11:35:04 AM

JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY		JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY	
P	TYPE (GROUP)		TOTAL VALUE
R	Burned		
O	Count/Forged		
P	Dest./Damaged		
E	Recovered		
R	Seized		
T	Stolen		
Y	Unknown		

ADMI: SUBJECT IDENTIFIED  YES  NO SUBJECT LOCATED  YES  NO

ACTIVE  ADM. CLOSED  ARRESTED UNDER 18  EX-CLEAR UNDER 18

UNFOUNDED  ARRESTED 18 AND OVER  EX-CLEAR 18 AND OVER

REASON FOR EXCEPTIONAL CLEARANCE: 1.  OFFENDER DEATH 2.  NO PROSECUTION 3.  EXTRADITION DENIED 4.  VICTIM DECLINES COOPERATION 5.  JUVENILE - NO CUSTODY

REPORTING OFFICER(S)	DATE	UNIT NUMBER	APPROVING OFFICER	DATE	UNIT NUMBER
SGT MICHAEL GAINY	01/05/2015	501	LT W. DAVID BREWER	01/05/2015	305

FOLLOW-UP INVESTIGATION OFFICER:  YES  NO

**SENDER: COMPLETE THIS SECTION**

**COMPLETE THIS SECTION ON DELIVERY**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

A. Signature  
 *Ricky W. Chestnut*  Agent  
 Addressee

B. Received by (Printed Name) *Ricky W. Chestnut* C. Date of Delivery *1/20*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

1. Article Addressed to:  
*Ricky Chaistain*  
*274 Cedar Grove Rd*  
*Laurens, SC 29360*



3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

2. Article Number (Transfer from service label)  
 7015 1520 0003 2665 1792

**SENDER: COMPLETE THIS SECTION**

**COMPLETE THIS SECTION ON DELIVERY**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

A. Signature  
 *Calvin Storkus*  Agent  
 Addressee

B. Received by (Printed Name) *CS* C. Date of Delivery *1/23/17*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

1. Article Addressed to:  
*Socrates D. Ledda*  
*291 West Main St*  
*Laurens, SC 29360*



3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

2. Article Number (Transfer from service label)  
 015 1520 0003 2665 1808

**SENDER: COMPLETE THIS SECTION**

**COMPLETE THIS SECTION ON DELIVERY**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

A. Signature  
 *Calvin Storkus*  Agent  
 Addressee

B. Received by (Printed Name) *CS* C. Date of Delivery *1/25/17*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

1. Article Addressed to:  
*Sgt Michael Gainer*  
*201 West Main St*  
*Laurens, SC 29360*



3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

2. Article Number (Transfer from service label)  
 7015 1520 0003 2665 1822

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

USPS LAURENS SC 29360

Postmark Here  
 JAN 18 2017  
 01/18/2017

9590 9402 2352 6225 0854 66

Certified Mail Fee	\$3.30
Extra Services & Fees (check box, add fee as appropriate)	\$2.70
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.68
Total Postage and Fees	\$6.68

Sent to *Sgt Michael Gainer*  
 Street and Apt. No., P.O. Box No.  
 201 West Main St

USPS Post Office Service  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

LAURENS, SC 29360

**OFFICIAL USE**

Certified Mail Fee \$3.30

Services & Fees (check box, add fees as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$ 0.00
<input type="checkbox"/> Return Receipt (electronic)	\$ 0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ 0.00
<input type="checkbox"/> Adult Signature Required	\$ 0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ 0.00

Postage \$0.68

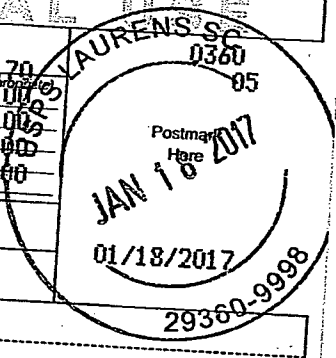
Total Postage and Fees \$6.68

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

PS Form 3800, April 2015 PSN 7530-02-000-9072-9998 See Reverse for Instructions



Help  
 UNITED STATES POSTAL SERVICE  
 January 25, 2017

al Entry Rates/ Commitments PTR / EDW USPS Corporate Accounts

Signature: *Jay Pittman*

Address: *211 W Main St*

Enter up to 35 items separated by commas.

*Pittman - supervisor of the*

Select Search Type: Quick Search

Product Tracking & Reporting, All Rights Reserved  
 Version: 11.0.0.17

REGISTERED MAIL® RECEIPT  
(Certified Mail Only)

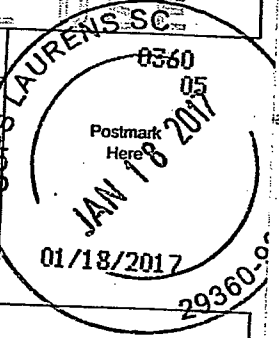
For more information, visit our website at [www.usps.com](http://www.usps.com)  
LAURENS, SC 29360

Registered Mail Fee \$3.30

- Services & Fees (check box, add fee as appropriate) \$2.70
- Return Receipt (hardcopy) \$0.00
- Return Receipt (electronic) \$0.00
- Certified Mail Restricted Delivery \$0.00
- Adult Signature Required \$0.00
- Adult Signature Restricted Delivery \$0.00

Postage \$0.68

Total Postage and Fees \$6.68



Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

PS Form 3838, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Signature

*[Handwritten Signature]*

Address

PO Box 663  
Laurens SC 29360

Enter up to 35 items separated by commas.

Select Search Type: Quick Search

Submit

RULE 209

RECEIVED  
MAR 30 2018  
SC Court of Appeals

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

The assertion or designation of matter in this case 2017-001831 is that the plaintiffs did send a summons which was combined with the complaint. As the assistant clerk indicated, "the attorneys of record must have concluded they were summoned, because they, answered. Plaintiffs typed the filing as "summons and complaint" it had all the information regarding the defendants and the nature of the summons and complaint. The case was not dismissed with prejudice at the circuit court level. It simply state in the reason for dismissal was there was no summons, which the plaintiffs disagree with. On the front of the dismissal rule 16 (b) was check but not indicated as a reason for dismissal.

As noted in the legal literature the use of 16 (b) has been over used in stopping due process. The stenographer did not send both transcripts even though the plaintiffs request them. Judge Addy granted a rehearing and did not say anything about the summons in the second haring, he noted or suggested that the plaintiffs should get an attorney and 16 9b0 was still checked, at that second hearing plaintiffs did maintain that the defendants were properly served by the US postal service with help from one of the postal workers.

All green cards were returned except one who Mr. Socrates Ledda said was intercepted by the deputies supervisor. However the postal service did give the plaintiffs a paper sheet showing the supervisors signature. Those green cards and proof of delivery were taken in as exhibits by the court of common pleas. It can be shown that they plaintiffs requested all transcripts. Beyond where the plaintiffs missed the first hearing due to illness and was granted a new hearing. Plaintiffs do not know if this was intentional or an oversight or misconduct. This designation of matter does not contain anything the plaintiffs believe that is not relevant to the appeal. The clerks kept the plaintiffs brief and sent back a ( copy) of the transcript the plaintiffs, were able to obtain. The matter before the court of appeals as presented in the court of common pleas is that the police used unnecessary force, entered the plaintiffs residence without a warrant and there was unequal justice under the law as the plaintiffs neighbor was told "to go back into their apartment. No other homes listed on the police report indicated that the police entered the persons they contacted, homes.

*Miss J. Brader (plaintiffs)*  
*Malcolm D. Watts*

Addendum to Initial brief/ designation of matter  
For Record of appeal

The case we are dealing with was not a trial or at a point where evidence and discovery or witness list were presented. It was about whether the case would move forward and the plaintiffs would get due process. The attorneys of record indicated that they were not receive a summons, yet they answered. This was mentioned in my initial brief, noted that a clerk asked, why did they answer? I am including an amended answer, in hopes that we can agree they answered. These are seasoned attorneys. Thus they felt they had received a summons or they just were stringing the case and clients out for additional billing work. I am including an example of an amended answer to support what I contend. It is in the record of the lower court. I did not receive my transcript for which we were there, thus we cannot refer to it. I have filed a misconduct claim with the court administrator, showing that I discussed the second hearing and cost. I believe it was malicious because both attorneys for the city and county received transcripts for august 1, 2017.

Mosi A. Bundu  
Malcolm DJ Watts

206B Mock Street  
Laurens SC 29360  
1805 Curry Road  
Laurens Sc 29360

STATE OF SOUTH CAROLINA  
COUNTY OF LAURENS

IN THE COURT OF COMMON PLEAS  
EIGHTH JUDICIAL CIRCUIT

Mosi A. Bundu; Malcolm D.J. Watts,

**AMENDED ANSWER OF DEFENDANTS,  
SHERIFF'S DEPARTMENT, LAURENS,  
S.C. AND RICKY CHASTAIN**

Plaintiff,

Civil Action Number:  
2017-CP-30-0008

vs.

**[Jury Trial Requested]**

Ricky Chastain, County Sheriff's Dept.,  
Socrates Ledda, City Police Chief, Sgt.  
Michael Gainey and Officer Logan  
Kanipe,

Defendants.

Subject to any Motion filed or served herewith, the Defendants, Sheriff's Department, Laurens South Carolina, and Ricky Chastain by way of Amended Answer to the Plaintiffs' Amendment to Complaint would respectfully show onto the Court as follows:

**FOR A FIRST DEFENSE**

1. That except as is expressly admitted, modified, or explained herein, each and every allegation of the Plaintiffs' document entitled Amendment to Complaint dated February 28, 2018, is denied and strict proof thereof is demanded.

2. That further in response to the allegations of the alleged Amendment to Complaint, these Defendants deny that there was any unlawful entry into or onto the premises of the Plaintiffs.

3. These Defendants further deny that the Plaintiffs have any cognizable claim against them.