

FORM 19
PETITION FOR A WRIT OF CERTIORARI
IN POST-CONVICTION RELIEF ACTIONS

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CALHOUN COUNTY
Court of Common Pleas

Lockemy, C., and Thomas and Geathers., Appeals Court Judges

Case No. 2016-001867

Bonnie Riley

Petitioner,

v.

Michael Outlaw

Respondent.

RECEIVED
JAN 14 2016
SC Court of Appeals

PETITION FOR A WRIT OF CERTIORARI

Special referee: Richard B. Ness was bias in his decision. My Lawyer Failed to speak up on my behalf. Then quit before it came to the appeals court. No one has looked closely at the evidence. The plats for the property. My trial by jury I was told would happen.

Michael Outlaw hid and buried the back property pin six feet under ground to hide its true location. Which is way off if a judge will look at plats. Then the truth will be apparent.

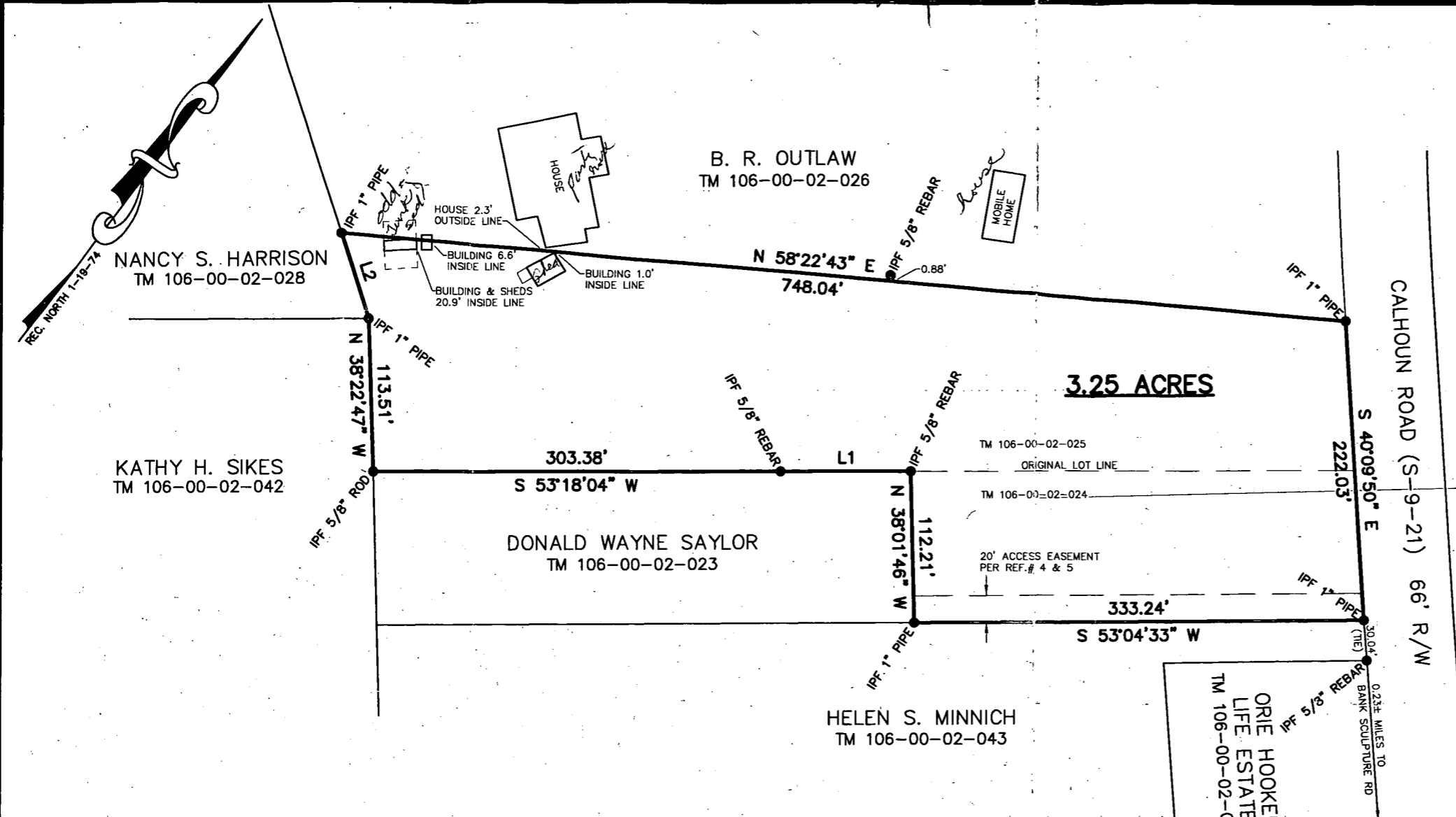
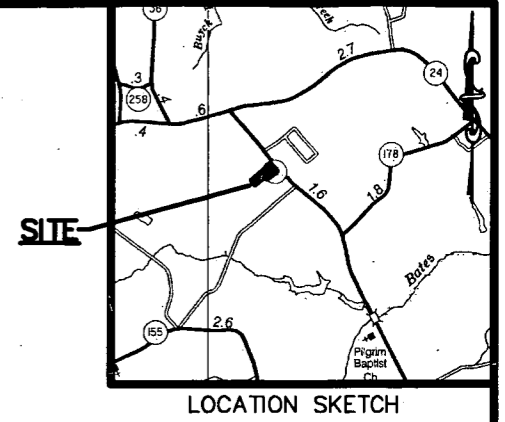
All the work he has done there was on his father's lot at the time not on my land. All he's done on my land was harvest and mill my pines to build a warehouse on his father's land with the lumber from my pines. He has made no improvements to my. Except destroy numerous things on my land. IE: Cut grass to short (killing it), knock holes in siding with mower. That was Matthew. Who later blew mower up. Cut a limb out of tree with a backhoe bucket?

No one was present when Michael and I talked about anything. Brandi was in Mississippi with her husband at the time. Matthew was on the property but anywhere nearby. Brandi is the cusp behind the lies and manipulation of all.

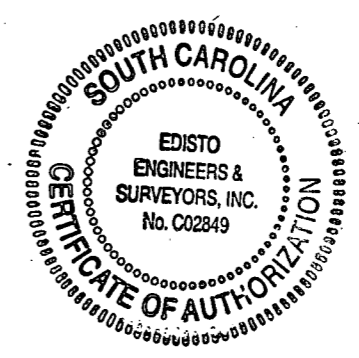
Brandi even went to Calhoun county courthouse to get a form to will and bequeath with love and affection to Michael Outlaw. I didn't tell her to do that. It's in the court documents. That's fraud. Please look closer it's all civilly incorrect.

I truly want to have a real trial with a judge and 12 of our peers

This is the latest copy



LINE	BEARING	DISTANCE
L1	S 53°16'15" W	96.02'
L2	N 54°07'18" W	66.60'



TM 106-00-02-024
 TM 106-00-02-025

A
 PLAT
 OF
3.25 ACRES
 STATE OF SOUTH CAROLINA
 COUNTY OF CALHOUN
 AMELIA TOWNSHIP

PREPARED FOR:
BONNIE RILEY

"I HEREBY STATE THAT TO THE BEST OF MY PROFESSIONAL KNOWLEDGE, INFORMATION, AND BELIEF, THE SURVEY SHOWN HEREON WAS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF THE STANDARDS OF PRACTICE MANUAL FOR SURVEYING IN SOUTH CAROLINA, AND MEETS OR EXCEEDS THE REQUIREMENTS FOR A CLASS 'C' SURVEY AS SPECIFIED THEREIN."

NOTES:
 NO ABSTRACT OF TITLE, NOR THE TITLE COMMITMENT, OR RESULTS OF A TITLE SEARCH WERE FURNISHED TO THE SURVEYOR. THERE MAY EXIST OTHER DOCUMENTS OF RECORD THAT MAY AFFECT THIS SURVEYED PARCEL.

COPYRIGHT © EDISTO ENGINEERS & SURVEYORS, INC. ALL RIGHTS RESERVED. NO PART OF THIS DRAWING MAY BE REPRODUCED BY PHOTOCOPYING, RECORDING OR BY ANY OTHER MEANS, OR STORED, PROCESSED OR TRANSMITTED IN OR BY ANY COMPUTER OR OTHER SYSTEMS WITHOUT THE PRIOR WRITTEN PERMISSION OF THE SURVEYOR. COPIES OF THIS DRAWING WITHOUT AN ORIGINAL SIGNATURE AND IMPRESSION SEAL ARE NOT VALID.

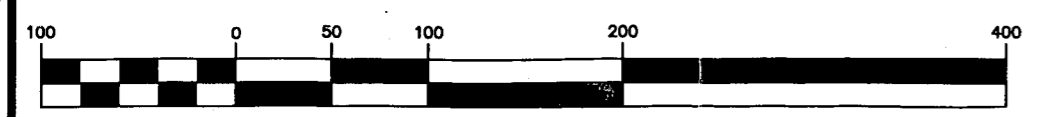
REFERENCE:
 1. A PLAT FOR MICHAEL OUTLAW BY EDISTO ENGINEERS & SURVEYORS, INC. DATED MAY 16, 2005 REVISED DECEMBER 17, 2008.
 2. A PLAT FOR DAVID W. MINNICH & HELEN S. MINNICH BY W. J. WESTBURY & ASSOCIATES DATED APRIL 27, 1998 REVISED MARCH 10, 2005.
 3. A PLAT FOR MILTON SMOAK, ET AL BY LUTHER LEE LOWN, R.L.S. DATED NOVEMBER 6, 2003.
 4. A PLAT FOR OLLIE LONG BY EDISTO SURVEYORS, INC. DATED AUGUST 1, 1991.
 5. A PLAT FOR CECIL BUTTREY BY JOHN K. DAVIS, R.L.S. DATED JANUARY 31, 1987.
 6. A PLAT FOR BILLY R. OUTLAW BY JOHN K. DAVIS, R.L.S. DATED JANUARY 19, 1974.

CERTIFICATION IS MADE TO THOSE PERSONS FOR WHICH THIS PLAT WAS PREPARED AND IS NOT TRANSFERABLE.

ADJACENT OWNERS SHOWN AS LISTED PER WWW.CALHOUNCOUNTY.SC.GOV.

- IPP IRON PIN PLACED (5/8" REBAR)
- IPF IRON PIN FOUND
- CC COMPUTED CORNER

GRAPHIC SCALE



(IN FEET)
 1 inch = 100 ft.

DATE: FEBRUARY 23, 2016

20447.DWG

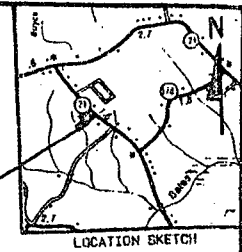
CLIFTON H. HARPER (803)536-1104 J. J. JOHNSON, JR.
 S.C. REG. LS. NO. 25747 FAX (803)531-1115 S.C. REG. LS. NO. 23142
EDISTO ENGINEERS & SURVEYORS, INC.
 PO BOX 1725 ORANGEBURG, SOUTH CAROLINA 29116

CARLSON P: /LAND PROJECTS 2004/20447/DWG/20447.DWG/2-23-2016 (J.J.)

Print one

20447-15434 B

CURVE TABLE				
CURVE	CHORD	RADIUS	DELTA	ARC CHORD BEARING
C1	294.91	2898.78	5°49'54"	S37°43'09"E



SITE

LOCATION SKETCH



PARCELS A & B: TM 106-00-02-026
 A PORTION OF
 PARCEL C: TM 106-00-02-025

A
PLAT
OF
6.47 ACRES
 STATE OF SOUTH CAROLINA
 COUNTY OF CALHOUN
 AMELIA TOWNSHIP

SURVEYED FOR:

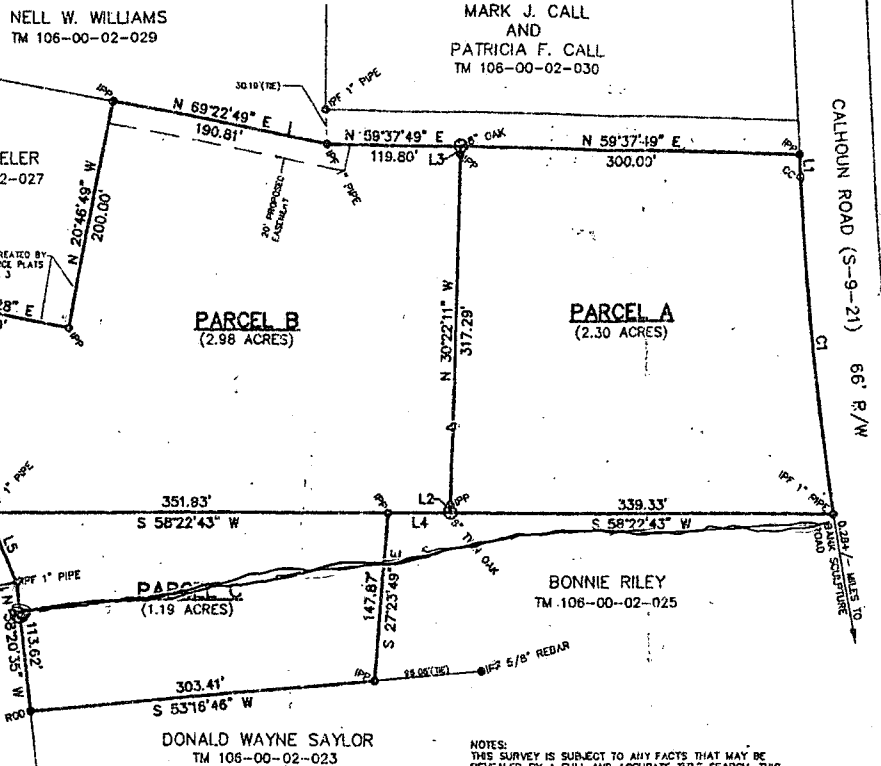
MICHAEL OUTLAW

"I HEREBY STATE THAT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF, THE SURVEY SHOWN HEREON WAS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF THE MINIMUM STANDARDS MANUAL FOR THE PRACTICE OF LAND SURVEYING IN SOUTH CAROLINA, AND MEETS OR EXCEEDS THE REQUIREMENTS FOR A CLASS 'C' SURVEY AS SPECIFIED THEREIN."

Richard L. Spierman
 RICHARD L. SPIERMAN 0003156-1104 A.R. PARLER, JR.
 S.C. REG. L.S. NO. 5496 S.C. REG. L.S. NO. 5301

EDISTO ENGINEERS & SURVEYORS, INC.
 PO BOX 1725 ORANGEBURG, SOUTH CAROLINA 29116

15434 B

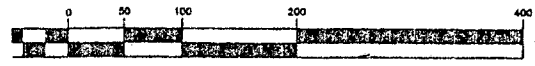


LINE DATA		
LINE	BEARING	DISTANCE
L1	S 34°48'12" E	19.87
L2	N 30°22'11" W	0.72
L3	N 30°22'11" W	1.49
L4	S 58°22'43" W	56.62
L5	N 54°07'57" W	66.88

CALHOUN COUNTY ENGINEERING COMMISSION
 AUG 17 2009

IRON PIN PLACED (5/8" REBAR)
 IRON PIN FOUND
 COMPUTED CORNER

GRAPHIC SCALE



(IN FEET)
 1 inch = 100 ft.

- REFERENCE:
1. A PLAT FOR MICHAEL R. OUTLAW BY JOHN K. DAVIS, R.L.S. DATED DECEMBER 19, 1981 RECORDED PLAT 2020.
 2. A PLAT FOR BERNIE L. WRIGHT AND DENVER L. WRIGHT BY JOHN K. DAVIS, R.L.S. DATED OCTOBER 3, 1977 RECORDED PLAT 1247.
 3. A PLAT FOR BILLY R. OUTLAW BY JOHN K. DAVIS, R.L.S. DATED JANUARY 19, 1974 RECORDED PLAT 558.
 4. A PLAT FOR L. E. FREE BY JOHN K. DAVIS, R.L.S. DATED JANUARY 19, 1974 RECORDED IN PLAT BOOK 10, PAGE 37.
 5. A PLAT FOR OCOL BUTTREY BY JOHN K. DAVIS, R.L.S. DATED JANUARY 31, 1987 RECORDED PLAT 3038.

NOTES:
 THIS SURVEY IS SUBJECT TO ANY FACTS THAT MAY BE REVEALED BY A FULL AND ACCURATE TITLE SEARCH. THIS PROPERTY MAY BE AFFECTED BY EASEMENTS, ENCROACHMENTS AND/OR ENCUMBRANCES, RECORDED OR OTHERWISE, THAT A COMPLETE TITLE SEARCH MAY REVEAL.

COPYRIGHT © EDISTO ENGINEERS & SURVEYORS, INC. ALL RIGHTS RESERVED. NO PART OF THIS DRAWING MAY BE REPRODUCED BY PHOTOCOPYING, RECORDING OR BY ANY OTHER MEANS, OR STORED, PROCESSED OR TRANSMITTED IN OR BY ANY COMPUTER OR OTHER SYSTEMS WITHOUT THE PRIOR WRITTEN PERMISSION OF THE SURVEYOR. COPIES OF THIS DRAWING WITHOUT AN ORIGINAL SIGNATURE AND IMPRESSION SEAL ARE NOT VALID.

CERTIFICATION IS MADE TO THOSE PERSONS FOR WHICH THIS PLAT WAS PREPARED AND IS NOT TRANSFERABLE.

REVISED: DECEMBER 17, 2008 (PARCEL C ADDED)
 DATE: MAY 16, 2005

15434rev.DWG

*Inked Line was always where we assumed Line.
 Never was an issue until Michael*

Calhoun County GIS



Notes (up to 200 characters)



THIS MAP IS PREPARED FOR THE INVENTORY OF REAL PROPERTY FOUND WITHIN THIS JURISDICTION, AND IS COMPILED FROM RECORDED DEEDS, PLATS, AND OTHER PUBLIC RECORDS AND DATA. USERS OF THIS MAP ARE HEREBY NOTIFIED THAT THE AFORMENTIONED PUBLIC PRIMARY INFORMATION SOURCES SHOULD BE CONSULTED FOR VERIFICATION OF THE INFORMATION CONTAINED ON THIS MAP. THE COUNTY AND MAPPING COMPANY ASSUME NO RESPONSIBILITY FOR THE INFORMATION CONTAINED ON THIS MAP.

*** THIS MAP IS NOT TO BE USED AS A PLAT ***

Wachovia Mortgage Corporation

Post Office Box 900001
Raleigh, North Carolina 27675-9000

1100 Corporate Center Drive
Raleigh, North Carolina 27607-5066

WACHOVIA

GLYNESS RILEY ESTA
178 CALHOUN RD
SAINT MATTHEWS, SC 29135

this was the only thing that was signed for my loan co. to be released to me only not Brandon. if there was anything else on it she did it not me.



October 1, 2007

Re: Partial Release for All Loans

WMC Loan Number: 0005834774

Property Address: ROUTE 4 BOX 40
SAINT MATTHEWS, SC 29135

The following items are required to process a partial release on the above referenced loan.

ALL PARTIAL RELEASE REQUESTS ARE FOR LAND ONLY. The loan must have at least one year payment history to be considered for partial release.

B 1. The borrower must be current in making their mortgage payments and has not been more than 30 days past due more than once in the most recent 12-month period, and has not otherwise been in default under the terms of the security instrument.

B 2. A letter signed by you containing: *I can help you write this letter.*
* The reason for the release
* The amount of cash consideration you will receive, if any
* The intended use of the consideration
* Your acknowledgement that all expenses incurred in processing this release will be paid by you (expenses may include cost of surveys and appraisals in addition to a pay-down in the principal balance, if required)

B or L 3. A copy of the plat or survey of the property encumbered by the mortgage, clearly outlining the property to be released. The plat or survey should also include the location of any structures, driveways, easements, wells, septic tanks, etc.

4. An appraisal, including the value of the total property and the value of the property being released. *or tax assessor. Call Wach*

L 5. A Partial Release Deed containing the legal description (in metes and bounds if applicable) of the portion of property to be released for execution by the mortgagee/beneficiary. Please review the security instrument and/or the assignment to see if the mortgagee/beneficiary is MERS or Wachovia. This Deed must be completed by a qualified attorney; Wachovia Mortgage Corporation does not prepare these documents.

Wachovia Mortgage Corporation

Post Office Box 900001
Raleigh, North Carolina 27675-9000

1100 Corporate Center Drive
Raleigh, North Carolina 27607-5066

WACHOVIA

- # 6. Provide tax assessment information regarding the number of parcels, along with information on whether existing parcels will be subdivided or released. *Tax assessment*
- L 7. A copy of a current Title Search.
- B 8. Name, address, phone number and loan number for any additional lien holders. *NONE*
- W 9. A check in the amount of \$250.00, payable to Wachovia Mortgage Corporation. This is a non-refundable processing fee.
- B 10. Complete the enclosed Application for Release of Security form.

*Note: All incomplete packages will be returned.

Upon receipt of the requested items, we will submit them to the appropriate parties for review. You will be notified if additional documentation is required. Please allow at least three weeks for processing. The Partial Release Deed will be executed and returned to you for recording. Once recorded, please return the original document to us, along with an updated title policy.

We will notify you if a pay down of the principal balance is required to maintain your current loan to value ratio. If required, you will be responsible for submitting certified funds to Wachovia Mortgage Corporation. The Partial Release Deed will not be executed until after the pay down has been received.

*Note: Our release of the security is conditional upon receipt, within thirty days after recording, of a title policy or title policy endorsement confirming the partial release.

If a partial release is approved and you would like the executed document returned to you via express mail, please enclose a prepaid express mail envelope.

Once you have completed the requirements listed in 1-10 above, you may send/fax the complete package to the following:

Cynthia E. Lawrence
Wachovia Mortgage Corporation
1100 Corporate Center Drive, Mail Code NC4755
Raleigh, NC 27607

If you have any questions, our Customer Service Representatives are available to assist you at (866) 642-9405 between 8:30 AM and 5:30 PM, EST, Monday through Friday. We appreciate your business and look forward to serving you in the future.

Sincerely,

Nicholas Battle

Nicholas Battle
Legal Research Department

LS000

**GLENN WALTERS
ATTORNEY AT LAW, P. A.**

1910 RUSSELL STREET. POST OFFICE BOX 1346 • ORANGEBURG, S.C. 29116
TELEPHONE: (803) 531-8844 • FACSIMILE: (803) 531-3628 • Toll Free: (888)966-8844
Email: glennwalterspa@gmail.com

Glenn Walters, Sr., Esquire
R. Bentz Kirby, Esquire, Of Counsel

February 19, 2013.

Martin Banks, Esquire
Law Office of Martin Banks
716 Huff Drive, N.
St. Matthews, SC 29135

RE: My Client: Bonnie Riley

Dear Martin:

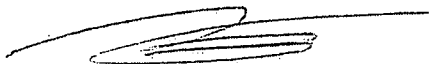
I have been retained to represent Ms. Bonnie Riley. Ms. Riley presented a copy of the letter you forwarded to her on February 6, 2013. She has several concerns:

- A. Ms. Riley believes you have a serious conflict of interest. Ms. Riley informed me that you prepared her taxes. You have full knowledge of her financial standing and have advised her with regards to her tax status.
- B. Ms. Riley informed me she was contacted by you and told to come to the office to sign the deed for Michael Outlaw, you advised her not to sign it because of Mr. Outlaw's financial status. Ms. Riley further went on to state that she contacted Mr. Outlaw's wife and informed her of your advice. Ms. Riley alleges that Mrs. Outlaw called you and was displeased.

I believe you have a serious conflict and should withdraw from representing Mr. Outlaw. Ms. Riley appeared at my office with her son and it was clearly evident that she was visibly shaken and considering her options. I told Ms. Riley I would write you and attempt to resolve this matter to the benefit of all parties.

Please respond to this correspondence. I look forward to hearing from you.

Sincerely,


Glenn Walters
Attorney at Law

GW/hby



Martin Banks

Atty. at Law
716 Huff Drive
St. Matthews, SC 29135
Tel: 803-874-2100 Fax: 803-874-2400

March 6, 2013

Glenn Walters
P.O. Box 1346
1910 Russell Street
Orangeburg, SC 29116

RE: Outlaw v. Riley

*he has 1/2 of 2 bldg. on my land
a dumpster, pile of junk metal
all on my land.*

Dear Glenn:

I have reviewed my file in light of your letter dated February 19. Before I decide whether I should be conflicted out of this matter, you must be aware that there is an eviction case concerning this property pending before Magistrate Lake. If you have reviewed the letter that I sent to Ms. Riley, you must realize that this is simply not an eviction case. I believe it would be wise, and the best use of all of our time, if Ms. Riley voluntarily dismisses the eviction because before I got your letter I had already drafted a Complaint dealing with the title issues. In addition, the Outlaws tell me that there is nothing on the 1.19 acres to evict. No residence or mobile home (which is what the pleadings say), only a shed or two that I believe may be fixtures.

In any event, Ms. Riley is correct that I did do her taxes for the years of 2007 and 2009. I have no knowledge as to her current financial standing at all, because of the amount of time that has passed and because income taxes have only to do with income not debts and assets. This is not a conflict, and I will represent them in the eviction matter if Ms. Riley does not voluntarily dismiss it.

However, I also tried to handle her transfer of the property to the Outlaws back in 2009. The closing was never completed because my research showed that there were some liens that were about to expire and it would be best to wait before transferring the property into the Outlaws. Those liens have expired now. But, in abundance of caution, because of my previous involvement I do believe that it is best that I withdraw as counsel for the Outlaws in this matter after the eviction is heard, if necessary. The magistrate is waiting to know if we need to schedule the hearing.

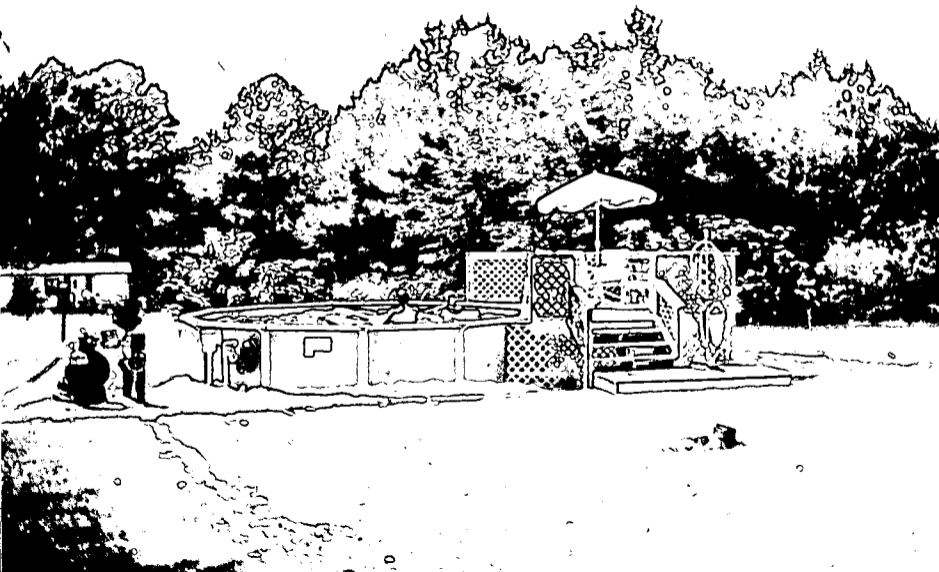
Sincerely,

Martin

Martin R. Banks
MRB/bh

C:\Users\Barb\Documents\Barb\Shared\Docs\Outlaw\Walters\let.wpd

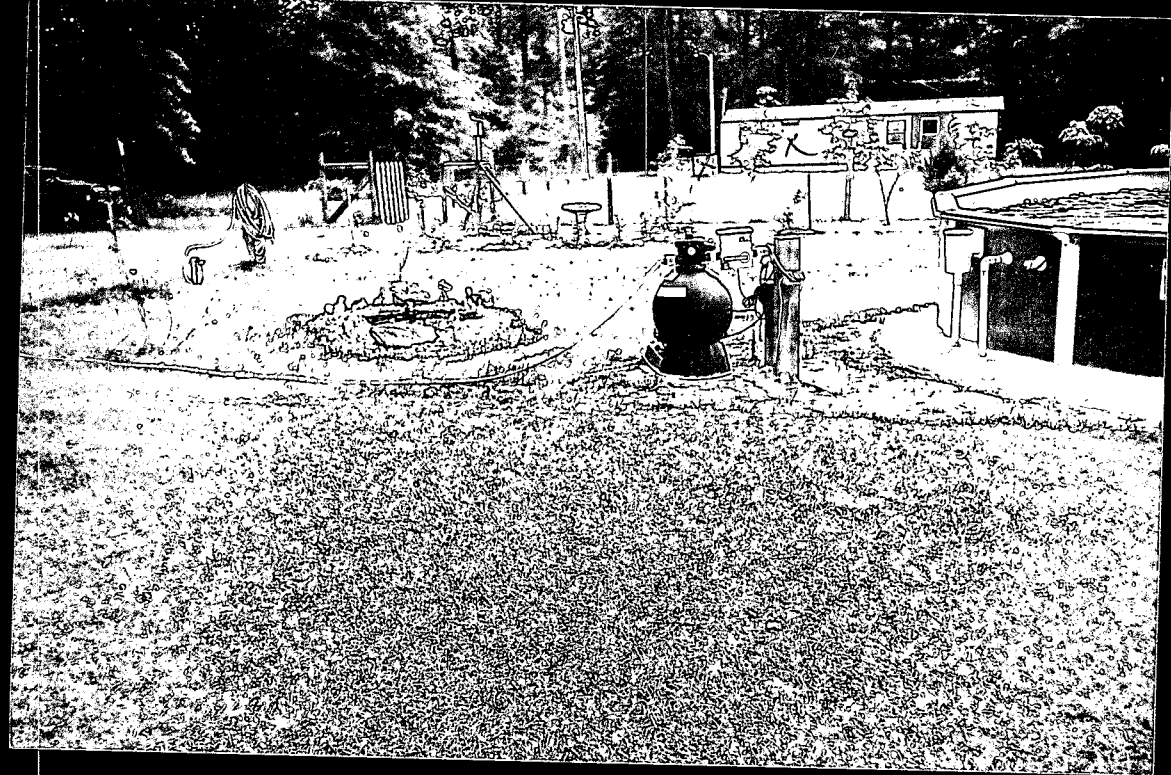




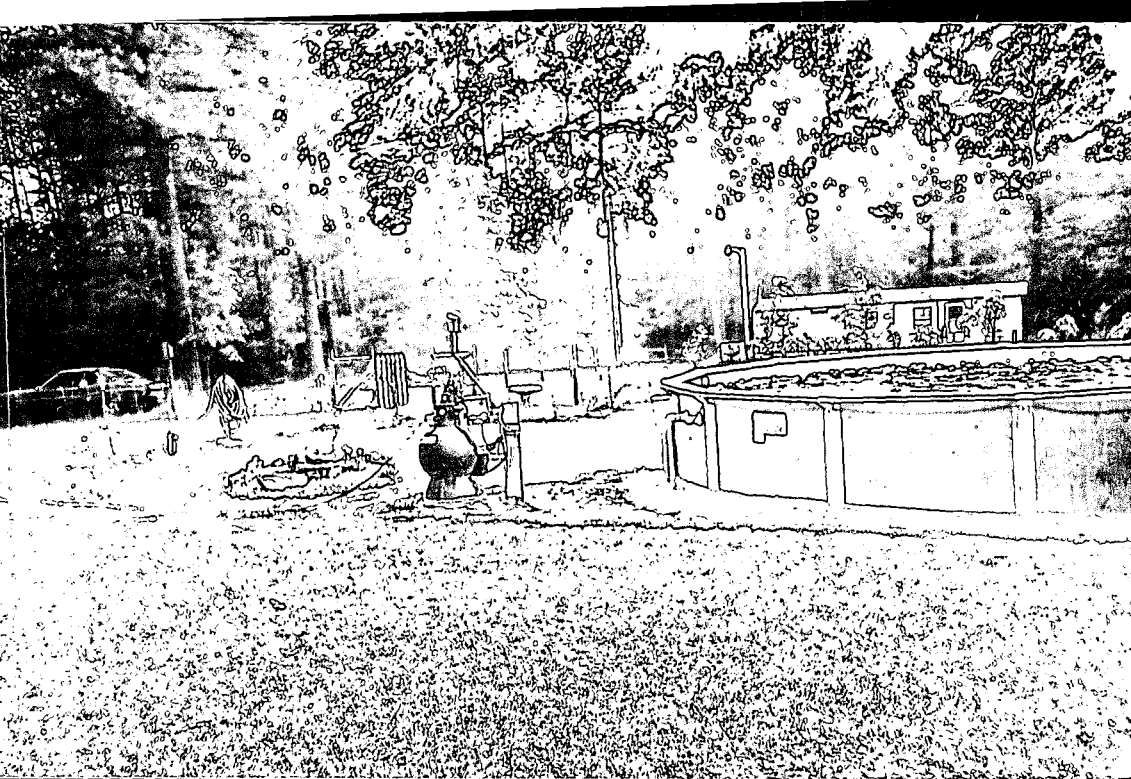
all the trees

and Mobil home was land

in question before he tore it up.



mobile home + white box next to
light pole is sand in question



The well house shows in this one
the little white box next to left pole



large hole they
dug to fill their
dive

<No. ###>013 CN

*26-2001 003 N N N N 13 418904 11.02.13 6R05 Z122.2/ 100.0







Remains of Pump house
Back lot.

<No. ###>010 CH

*2b-2001 003 N N N N 18 418984 11.02.13 GR05 Z122.2/ 100.0

























My Back yard

<NO.###>027 CN
*2P-2001 003 N N N N 06 418904 11.02.13 6M05 2122.2/ 100.0



This is how the land
looks now!

<NO.###>019CN
#26-2801 003 N N N N 06 418904 11.02.13 6R05 2122.2/100.0

Bonnie Riley
178 Calhoun Rd.
St. Matthews, SC 29135

South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina
29201