

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM GREENVILLE COUNTY COURT Common Pleas
JUDGE LETITIA H. VERDIN C/N: 2018-CP 230-HEB
APPELLATE CASE NO. 2019-000 290
MARCH 7th 2019,

ASSOCIATE WARDEN CLAYTON ET AL RESPONDENT

VS.
SHANID H.A. MATID ADA-PROSE APPELLANT
#199388


BRIEF OF APPELLANT

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SC Court of Appeals

STEVEN M. PAWITT ESQ.
414 MAIN ST. P.O. BOX 1547
GREENWOOD, SC 29648-1547

FREE SHANID MATID LEGAL DEFENSE FOUNDATION
GWJ & HIGH LIFE MOTIONS PRESIDENT ADA-PROSE
SHANID H.A. MATID #199388 - LCCJ F7 #2-990
(WISDOM) NY - BUNKERVILLE, SC 29010
VICE PRESIDENT KAREEMA MOSELEY @MAGMOT

CHITEST 

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE GREENVILLE COUNTY COURT OF COMMON PLEAS

JUDGE LETITIA H. VERDIN C.N. 2018-CP-273 H. 583

APPELLATE CASE NO. 2019-000296

MARCH 7th 2019

Assoc. Warden CLAYTON ET AL

RESPONDENT

VS.

SHANID H. A. MATIDANA-ROSE

APPELLANT

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SC Court of Appeals

BRIEF OF APPELLANT

ADA-APPELLANT moves Honorable COURT OF APPEALS to REVERSE
ORDER DISMISSAL, JUDGE LETITIA H. VERDIN, C.N., JAN. 8, 2019,
Based on Below FACTS:

, GROUND I,

ADA-APPELLANT DID SERVE ATTORNEY GEN. ALAN WILSON VIA CERTIFIED
MAIL R.4(a) 1(a) CERTIFICATE OF SERVICE, OCT. 16, 2018, EXH. A,
DEBIT FORM, \$5.00, MAILROOM, Ms. Jennifer Washington, Also val. note
, clerk WICKENSIMMER NOTIFIED ALSO, EXH. B, LETTER, clerk WICKENSIMMER,
validate, SCDC DIR. BRYANT P. STURLING, SERVED ALSO AND ADA APPELLANT
REQUEST SHERIFF INFORMATION. clocked stamped OCT. 22, 2018, 3:55pm
EXH. C, validates, SHERIFF STEVE LOUIS, SERVED COPY COMPLAINT,
SUMMONS VIA R.4(a)(c) AND COPY MAILED, clerk WICKENSIMMER,

Wickensimer


II.

AND CERTIFIED MAIL, ATTN: GEN. ALAN WILSON, STEVE PRUITTESQ,
ON NOV. 15, 2018, MAIL ROOM MS. JENNIFER WASHINGTON/
184, 35, ESTATE OF COLE v. HARRING 299 S.C. 525, 527, 386 S.E.2d
261, 266 (Ct. App. 1989) (SUMMONS AND COMPLAINT SHALL BE SERVED
TOGETHER ON EACH DEFENDANT); see also BBPT v. TAYLOR 369
S.C. 548, 552, 633 S.E.2d 501, 503 (2006);

GROUND II.

GREENVILLE COURT COMMON PLEAS IS PROPER JURISDICTION PER S.C. TORT CLAIMS
ACT §15-78-10 ET. §15-78-100(B) "COUNT WHERE ACT OR COMMISSION
OCCURRED...." PET. IS IN GREENVILLE COUNTY, EXH. D, NOTICE AND MOTION APPEAL
TO DEFENDANTS MOTION TO DISMISS clocked stamped, 12/19/18, 2:13p.m.
CLERK WICKENS SIMMER PAGES, JUDGE LETITIA H. VERDINE PROVIDED
SAME DOCUMENTATION, EXH. A-D, YET WAS PREJUDICE, DISCRIMINATED
AGAINST MENTAL ILL ADA APPELLANT VIOLATION §14-1-100 "JUDGES, COURTS
BIASNESS/ PREJUDICES"; TITLE II ADA §12132. *Trone v. Young Brothers
INC*, 318 S.C. 207, 456 S.E.2d 897, 899 (1995) "SERVES TWO PURPOSES
CONFERS PERSONAL JURISDICTION ON COURT AND ASSURES DEFENDANT OF
REASONABLE NOTICE OF THE ACTION"; *Thorne v. Simpson* 322 S.C. 518, 473 S.E. 2d
64, 66 (Ct. App. 1996)

SUMMARY

WHEREFORE, DUE TO ABOVE FACTS, CASE LAWS, ATTACHED MERITIAL EXHIBITS ADA
APPELLANT MAKES COURT OF APPEALS TO RETURN ORDER DISMISSAL; RETURN CASE
BACK TO LOWER COURT? AND OTHER RULINGS COURT DEEMS FIT ON THURSDAY
OF 8th MONTH OF MARCH 2019 s/ *Shahid Majid*
R. HILBY  WITHOUT PREJUDICE 1/21/2019

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE GREENVILLE COUNTY COURT OF COMMON PLEAS

JUDGE LETITIA H. VARDIN C/N: 2018-CP-230-2/583

APPEAL CASE NO. 2019-000296

JENNIFER A. KITCHINGS
clerk

P.O. BOX 11629 COLS/C 29211
1800 SERVICE ST. C/O S/C 29201

MARCH 7th, 2019

RE: SHAHID MAJID vs. ASSOC. BOARD. CLAYTON ET AL
"BRIEF of APPEAL; Proof of service clocked stamp copies
Rule 2(b)"

DEAR CLERK KITCHINGS;
PLEASE FIND ENCLOSED ADA-APPELLANTS "BRIEF of APPEAL";
Proof of service; Motion to Proceed Intervenors. EXTRA
COPIES ENCLOSED. PROVIDE JUDGE(S) NAMES, ADDRESSES THAT WILL
VIEW APPEAL AND CLOCKED STAMPED COPIES of all filings VIA R. 2(b)
RETURN TO ME. EXH. A; 1/8/19, ORDER APPEALING. PLEASE NOTE
RULE 4 ACCEPTANCE BY CLERK STATES "CLERK MUST NOT REFUSE TO FILE
BECAUSE DOCUMENTATION IN PROPER FORM." ON THIS DAY of 8th,
MONTH of 1 March, 2019

S/ Shahid Majid
WITHOUT PREJUDICE 1001-2019

PLEASE make copies of
EXHIBITS BRIEF! ONLY
ONE SET COPIES!

initials

Free SHALID NATION
C.W.P.; MICHAEL NATIONS PRESIDENT SHALID NATION
1993 9th - Lee R.L. F1#2-99D W/ Sackey Hwy. Birkpool, S.C. 29910
VICE PRESIDENT Kareema Masoley B.A. Agmat

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CLERK JENNY A. KITCHINGS
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1220 Senate St. Col. S.C. 29901