

Jody L. Ward, #300644
McCormick Corr.Inst.F-3-A-276
386 Redemption Way
McCormick, S.C. 29442

March 21, 2019

RECEIVED

APR 02 2019

S.C. SUPREME COURT

S.C. Supreme Court
Honorable Daniel Shearouse, Clerk
P.O. Box 11330
Columbia, S.C. 29211

Appellate Case No. 2019-000400
RE: Brief of Appellant & Record on Appeal & Response to reason
Appellant should not be allowed to file any future filings in
Circuit Court

Dear Mr. Shearouse,

Please find here enclosed an Original Courts Copy for filing,
at the time you are receiving this to file the Respondents were
served with a true & Correct Copy. *Please send me a Clocked Copy.*

I thank you for all your time & help with this matter. May God
Bless you abundantly.

Respectfully Submitted,

1st Jody Lynn Ward #300644

Jody Lynn Ward, #300644

cc.File:

The Office of Attorney General
Johnny E. James, Jr. Esq.

STATE OF SOUTH CAROLIAN

[In The Supreme Court]

APPEAL FROM GEORGETOWN COUNTY

Court of Common Pleas

William H. Seals Jr., circuit Court Judge S.C. SUPREME COURT

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APR 02 2019

Appellate Case No. 2019-000400
Lower Court Case No. 2018-CP-22-0488

State of South Carolina.....Respondents

v.

Jody Lynn Ward #300644.....Appellant

Reasons why such a Prohibition S.C.A.C.R Rule
243(c) should not be imposed against Appellant
on Future Filings in Circuit Court
(20) day Deadline Due By April 4, 2019

Other Counsel of Record:

S.C. Office Of Attorney General
Jonny Ellis James, Jr. Esquire
P.O. Box 11549
Columbia, SC 29211-1549

Respectfully Submitted,

s/ Jody Lynn Ward, #300644
Jody Lynn Ward #300644

Reasons as to why petitioner
should not be restricted in
future filings in this court

The Petitioner respectfully asserts that the filing of collateral attacks upon 2004 murder convictions (two) in 2003-GS-01030,01031 Georgetown have first in substantial compliance with SCRCP 11(b), Good faith averment on facts. And presented reasonable arguable issues. In response chronological order 2018-CP-22-00488 currently before the court arises out of Pattern of intentional concealment by juror Marissa Cooper #19 of information Defendant would have used to strike juror McCoy v. State 737 SE2d 623 (2103) SCRE 406 (seven of her tenants @ trailer park state witnesses and she does not admit during voir as to knowing any of them) clearly lower court committed a error of Law not to allow PCR evidentiary hearing on the McCoy v. State issue.

This same juror #19 Marissa Cooper also, as part of alleged pattern pur. to SCRE 406 also in SC Court of Appeals # 2018-000402 and intentionally failed to disclose a personal relationship to one of state witnesses, also under McCoy v. State, and lower court committed error of Law 29(b) appeal before SC Court of Appeals, Tristian Shaffer (ESQ)

Neither of two most recent PCR/29(b) on Juror misconduct can in any way be deemed frivolous, or fail to allege a proper timely grounds for relief 2009 PCR under Davies v. State 675 SE2d 416 (2009) was a valid argument offer of 30 years was not related to applicant Lafler v. Cooper/Missouri v. Frey (2012 US Supreme Court Cases) (Failure to relay plea offer to defendant require plea to be reoffered to defendant.)

This PCR was not frivolous and stated a valid cause of action. 2010 PCR dealt with this court treatment of a adoption of State v. Belcher 385 SE2d 802 (2007) and its arguable applicabilty to defendant case under Sandstrom v. Montona Line of case Law. And finally a Rule 29(b) denied July 31, 2012 dealt with a state-ment victims were paid to kill defendant.

Each of these PCR/29(b) with exception of juror misconduct have been denied on the merits, The Juror misconduct PCR/29(b) upon same juror #19 Marissa Cooper must be remanded for a full evidentiary hearing.

As none of cases were held to be malicious, frivolous, failed to state a meritorous arguable issue than a ban should not br be imposed upon his future pleadings.

And 2007 PCR was the initial PCR infact petitioner directs this courts attention to last 2 pleadings upon juror misconduct and point that the (2) pending appeals the case Sub Judice and the pending in SC Court of appeals State v. Ward 2018-000402 should

be consolidated as they pertain to same witness and her juror misconduct #19 Marissa Cooper concealed both a personal relationship to state witnesses but also a business relationship with (7) seven of state witnesses, her failure to disclose and intentionally concealing the relationship involves a pattern. This court has no reason to entertain a motion to restrict future filings when appeal sub judice warrants relief, to be able to have competent appellate counsel brief out juror misconduct.

The petitioner asserts each of his PCR/29(b) collateral attacks none have been deemed frivolous, or failure to state claim relief could be granted upon, which is benchmark in any action to restrict future filings which petitioner asserts no reasonable basis exists to or so- The record is clear in all PCR & Collateral attacks against his conviction that was all in compliance with S.C. Code Ann §§17-27-45(c); and State v Spann; And State v. McCoy, to be honest Appellant has really hasn't had Due Process of Law. And a Violation of S.C. Const. & U.S. Const. I respectfully ask this Court to grant his Notice of Appeal & forbide a Order of Such at this time.

Respectfully Submitted,

151 Jody Lynn Ward, #300644
Jody Lynn Ward, #300644
Appellant Prose

March 31, 2019

STATE OF SOUTH CAROLINA
[In The Supreme Court]
APPEAL FROM GEORGETOWN COUNTY

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APR 02 2019

William Seals Jr. Circuit Court Judge

Appellant Case No. 2019-000400 S.C. SUPREME COURT

State of South Carolina.....Respondents

v.

Jody Lynn Ward, #300644.....Appellant

CERTIFICATE OF SERVICE

I do hereby certify that the below named parties/respondents was served a copy of appellants

- 1) Response to why appellant should not be prohibited from future filings in Circuit Court S.C.A.C.R.Rule 243(c)
- 2) Brief of Appellant & Record on Appeal on this 21st day of March, 2019 by Placing a True & Correct Copy in the U.S. Postal mail, Postage Prepaid to the below respondents.

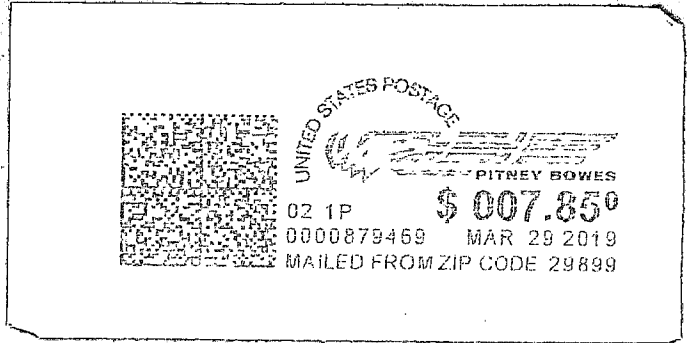
1) Office of the Attorney General
Johnny Ellis James, Jr. Esq.
P.O. Box 11549
Columbia, SC 29211-1549

Respectfully Submitted,
Jody Lynn Ward, #300644
Jody Lynn Ward, #300644

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The S.C. Supreme Court
Attn: Honorable Daniel Shearouse, Clerk
D.O. Box 11330