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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Alex Kinlaw, Jr., Circuit Court Judge

RECEIVED
APR 15 2019
SC Court of Appeals

Case No.: 2018-CP-23-02513
Appellate Case No.: 2018-001600

Gregory T. Christian,

Appellant,

vs.

Anna Healy,
Greenville Police Officer Andrew League,
City of Greenville, South Carolina,

Defendants.

Of whom Anna Healy is the Respondent.

MOTION OF RESPONDENT
TO REQUIRE CORRECTION OF RECORD ON APPEAL

Gregory T. Christian
15 Gallivan Street
Greenville, SC 29601

Appellant, *Pro Se*

Carl F. Muller, Esq., SC Bar No. 4131
Carl F. Muller, Attorney at Law, P.A.
607 Pendleton Street, Suite 201
Greenville, SC 29601
864-991-8905
carl@carlmullerlaw.com

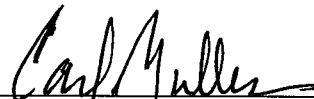
Attorney for Respondent

The Record on Appeal does not comply with Rule 210, SCACR because it contains “Complaint, Second Copy.” (Record, pp. 15-18). There are two reasons that this should not be part of the Record. The first is that it was not presented to the lower court. This is a violation of Rule 210(c). The second is that it was not designated by either party as required by Rule 209, SCACR.

The entire transcript is part of the Record. It shows that “Complaint, Second Copy” was not presented to the lower court. Attached to this Motion are the Designations of Record submitted by the Appellant and Respondent, respectively. Also attached is the Appellant’s Certificate of Service for his initial reply brief, which does not show an accompanying supplemental designation of record.

The Appellant should be required to submit a corrected Record on Appeal and Final Briefs because it appears that this submission was not an oversight. The Appellant describes himself as a rocket scientist. (Brief of Appellant, p. 3, Par. 1). Also, he is familiar with court proceedings, having filed a case related to this one, also *pro se*, in the United States District Court for the District of South Carolina, and, having lost it, filed an appeal, likewise *pro se*, to the United States Court of Appeals for the Fourth Circuit. (Tr. p. 9, ll. 9-16; Tr. p. 18, l. 17 through p. 19, l. 15)

Counsel for the Respondent also requests an extension of time to file his Final Brief until ten (10) days after the Court has ruled on this Motion.



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Attorney for Respondent

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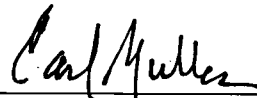
Defendants.

Of whom Anna Healy is the Respondent.

PROOF OF SERVICE

I certify that I have served the Motion of Respondent to Require Correction of Record on Appeal Submitted by Appellant by depositing a copy of the same to him in the U.S. Mail, postage prepaid, on April 12, 2019, at his address at:

15 Gallivan Street
Greenville, SC 29609



Carl F. Muller, Esq., SC Bar No. 4131
Carl F. Muller, Attorney at Law, P.A.
607 Pendleton Street, Suite 201
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Attorney for Respondent

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Gregory T. Christian,

Appellant,

v.

Anna Healy,
Greenville Police Officer Andrew League,
City of Greenville, South Carolina,

Defendants,

Of whom Anna Healy is the Respondent.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

1. Complaint;
2. Defendant Healy's Motion to Dismiss
3. Plaintiff's Response to Defendant Healy's Motion to Dismiss
4. Plaintiff's Response to Defendants Greenville Police Officer Andrew League and City of Greenville's Motion to Dismiss and Prayer for Dismissal in Defendant's Answer, with attendant Exhibits A-D

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v.

Anna Healy,
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City of Greenville, South Carolina,
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DESIGNATION OF MATTER TO BE
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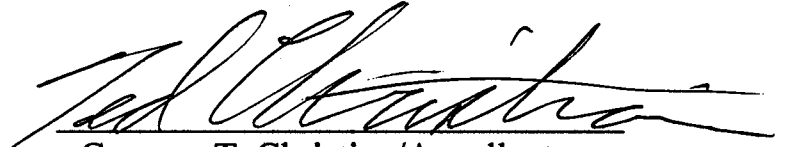
Appellant proposes the following be included in the Record on Appeal:

1. Complaint;
2. Defendant Healy's Motion to Dismiss
3. Plaintiff's Response to Defendant Healy's Motion to Dismiss
4. Plaintiff's Response to Defendants Greenville Police Officer Andrew League and City of Greenville's Motion to Dismiss and Prayer for Dismissal in Defendant's Answer, with attendant Exhibits A-D

5. Order Granting Defendants' Motions to Dismiss and Denying Plaintiff's Motion to Amend

I certify that this designation contains no matter which is irrelevant to this appeal.

October 1, 2018



Gregory T. Christian/Appellant
15 Gallivan St.
Greenville, SC 29609
(864) 232-9966

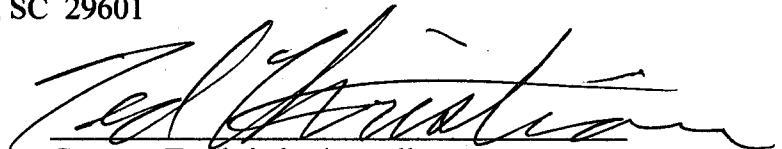
CERTIFICATE OF SERVICE

I certify that on October 1, 2018 I served a copy of this DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL on Respondent Anna Healy's counsel of record, addressed as shown below:

Carl F. Muller
607 Pendleton St., Suite 201
Greenville, SC 29601

and additionally that I served a courtesy copy upon the counsel of record for Defendants Greenville Police Officer Andrew League and the City of Greenville, South Carolina, addressed as shown below:

Ross B. Plyler
Roe Cassidy Coates and Price
1052 N. Church St.
Greenville, SC 29601



Gregory T. Christian/Appellant
15 Gallivan St.
Greenville, SC 29609

Order Granting Defendants' Motions to Dismiss and Denying
Plaintiff's Motion to Amend

I certify that this designation contains no matter which is irrelevant to this appeal.

October 1, 2018

Gregory T. Christian, Appellant
12 Galloway St.
Greenville, SC 29609
(864) 232-9966

CERTIFICATE OF SERVICE

I certify that on October 1, 2018 I served a copy of this DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL on Respondent Anna Healy's counsel of record, addressed as shown below:

Carl F. Muller
607 Pendleton St., Suite 201
Greenville, SC 29601

and additionally that I served a courtesy copy upon the counsel of record for Defendants Greenville Police Officer Andrew League and the City of Greenville, South Carolina, addressed as shown below:

Ross B. Plyler
Roe Cassidy Costas and Price
1052 N. Church St.
Greenville, SC 29601

Gregory T. Christian, Appellant
12 Galloway St.
Greenville, SC 29609

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Of whom Anna Healy is the Respondent.

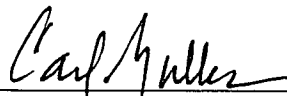
RESPONDENT'S DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Respondent/Defendant Anna Healy proposes the following be included in the

Record on Appeal:

- ✓ 1. Order Granting Defendants' Motions to Dismiss and Denying Plaintiff's Motion to Amend
2. Complaint
- ✓ 3. Healy's Motion to Dismiss
- ✓ 4. Pages 1 and 6 of Plaintiff's Response to Defendant Healy's Motion to Dismiss
- ✓ 5. Affidavit of George Greer with exhibits
- ✓ 6. Complete Transcript of Hearing on July 17, 2018

I certify that this designation contains no matter which is irrelevant to this appeal.



Carl F. Muller, Esq., SC Bar No. 4131
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Attorney for Respondent, Anna Healy

February 20, 2019

cast substantial doubt on the propriety of the lower court's refusal to grant leave to amend.

CONCLUSION

It is defamatory and actionable *per se* to publicly claim someone is a criminal. Respondent Healy did this repeatedly, claiming variously that she had seen Appellant steal a ring, that she believed Appellant had stolen a ring, that Appellant was the last person near a ring she could not find, and that Appellant was one of three people near a ring she could not find. Respondent Healy does not deny any of this, yet has never offered a single word of explanation for her actions, and as Appellant has noted, it is not possible to so much as confidently speculate why Respondent Healy did these things. Appellant is now as a consequence listed as a suspected criminal in a police report, and there was nothing he could do to stop it.

Respectfully submitted,

March 4, 2019

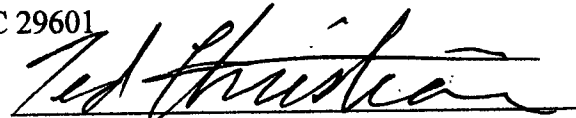


Gregory T. Christian/Appellant
15 Gallivan St.
Greenville, SC 29609

CERTIFICATE OF SERVICE

I certify that on March 4, 2019 I served a copy of this INITIAL REPLY BRIEF OF APPELLANT on Respondent Anna Healy's counsel of record, addressed as shown below:

Carl F. Muller
607 Pendleton St., Suite 201
Greenville, SC 29601



Gregory T. Christian/Appellant
15 Gallivan St.
Greenville, SC 29609

CARL F. MULLER, ATTORNEY AT LAW, P.A.

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GREENVILLE, SOUTH CAROLINA 29601

POST OFFICE BOX 1717
GREENVILLE, SOUTH CAROLINA 29602-1717

PHONE: 864-991-8904
FAX: 864-751-2831

CARL@CARLMULLERLAW.COM

April 12, 2019

VIA FEDERAL EXPRESS

The Honorable Jenny Abbott Kitchings, Clerk
The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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APR 15 2019

SC Court of Appeals

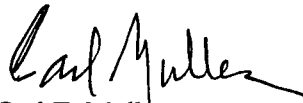
Re: Gregory T. Christian v. Anna Healy
Appellate Case No.: 2018-001600

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of my Motion of Respondent To Require Correction of Record on Appeal. My check in the amount of \$50.00 is included.

I discussed the Motion earlier today with Elizabeth Carter. Please convey my thanks to her.

Very truly yours,



Carl F. Muller

CFM:dph

c: Mr. Gregory T. Christian

Enclosure

Do not ship liquids, blood, or clinical specimens in this packaging.

3034
3052

FedEx Express Package US Airbill

FedEx Tracking Number 8092 2856 6288

Form No. 0215

MUR 1
NCO TRC

1 From
Date 4-12-19
Sender's Name Carl Muller Phone 804 991 2904
Company CARL F. MULLER, P. A.
Address 607 PENDLETON ST

2 Your Internal Billing Reference *Waxley*

3 To
Recipient's Name Hon. Terry A. Kitchens, Clerk
Company SC Court of Appeals Phone 803 734 1392
Address 125 Senate Street
City Columbia State SC ZIP 29201

4 Express Package Service

- Next Business Day**
- FedEx First Overnight
 - FedEx Priority Overnight
 - FedEx Standard Overnight

1/2 or 3 Business Days

- FedEx 2Day A.M.
- FedEx 2Day
- FedEx Express Saver

5 Packaging

- FedEx Envelope*
- FedEx Pak*
- FedEx Box
- FedEx Tube
- Other

6 Special Handling and Delivery Signature Options

- Saturday Delivery
- No Signature Required
- Direct Signature
- Indirect Signature
- Signature Required
- Signature Required - Shipper's Declaration
- Signature Required - Shipper's Declaration
- Dry Ice
- Cargo Aircraft Only

7 Payment

- Bill to: Sender's Acct. No. or Credit Card No. below
- Recipient
 - Third Party
 - Credit Card
 - Cash/Check



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