

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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Appeal from the Court of Common Pleas for ^{JUL 11 2019}
Richland County, South Carolina SC Court of Appeals

Alison Renee Lee, Chief Administrative Judge

Appellate Case No. 2019-000566

Richland County Sheriff DepartmentRespondent,

v.

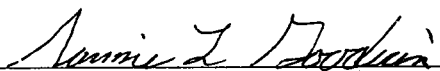
Sammie L. Goodwin.....Appellant.

MOTION TO REINSTATE APPEAL

Appellant/petitioner, Sammie Goodwin, respectfully moves this court for an order reinstating my appeal in this case. This motion is based upon the following points and authorities and the attached declarations.

Dated: July 11, 2019

Respectfully submitted,

 LS
Sammie L. Goodwin, Pro Se, Appellant
321 Isaac Street
Columbia, South Carolina 29203
(803) 376-7626

POINTS AND AUTHORITIES IN SUPPORT OF MOTION
TO REINSTATE APPEAL

Following the order and judgment entered on March 21, 2019 in Richland County Trial Court No. 2016CP4000387, appellant filed a notice of appeal on April 3, 2019.

All necessary documents were filed e.g., Included with the notice of appeal, appellant properly served the trial court. A proof of service was filed with the Court of Appeals, however it appears to have been lost. A letter of deficiency was issued noting all deficiencies. All the deficiencies were field as shown as Exhibit "A".

During this period my mail was being sent to an incorrect and being returned. Appellant was not receiving the information on time and by the time my addressed was corrected and mail delivered, appellant was overwhelmed. Appellant managed to make sure all documents were filed timely and correct all deviancies. Appellant previous delivered clocked copies of file documents. Appellant has been unable to find a clock copy of the filed proof of service for which the appeal was dismissed. The dismissal would cause severe hardship to the appellant and deny his due process.

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v.

Sammie L. Goodwin,.....Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the Trial Court by depositing a copy of it in the United States Mail, postage prepaid, on April 2, 2019, addressed to Richland County Judicial Center, Richland County Court House, **1701 Main St, Columbia, SC 29201**, on April 2, 2019.

April 2, 2019

 LS
Sammie L. Goodwin, Pro Se, Appellant
321 Isaac Street
Columbia, South Carolina 29203
(803) 376-7626