

BRIEF OF APPELLANT

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL BRIEF FROM Craig Molloy and Island Group, Inc.
d/b/a Carolina Cleaning

Beaufort County Court of Common Pleas

Honorable Marvin H. Dukes III, Master in Equity

Lower Court Case No. 2016-CP-07-01825

Appellate Case No. 2018-002170

Steven Craig Molloy and Island Group, Inc.
d/b/a Carolina Cleaning

Plaintiff

Of which Steven Craig Molloy is the
Appellant

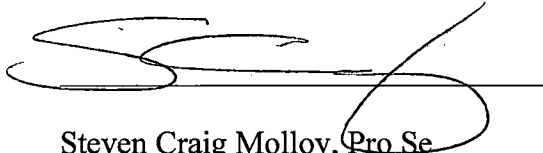
v.

Beaufort County Government,
Gary Kubic, Individually, and Beaufort County Administrator;
Josh Gruber, Individually and Former Beaufort County In-House Attorney;
Bryan Hill, Individually and Former Beaufort County Deputy Administrator;
Shannon Loper, Individually and Employee of Beaufort County Parks and
Leisure;
Stu Rodman, Finance Chair of Beaufort County Council;
Dave Thomas, Procurement Director, Beaufort County, South Carolina
Beaufort County Disabilities and Special Needs;
Beaufort County DSN Board

Respondents,

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SC Court of Appeals

September 16, 2019

A handwritten signature in black ink, appearing to read 'Steven Craig Molloy', is written over a horizontal line.

Steven Craig Molloy, ~~Pro Se~~ Appellant
43 Big Woods Dr. Hilton Head SC 29926
p: 843-368-73000
e: scmolloy@gmail.com

Respondents Counsel of Record:

John Fletcher, Dawes Cooke
Barnwell Whaley Attorneys
Po Box H Charleston, SC 29402
and
BC Attorney, Tom Keaveny
PO Box 1128, Beaufort SC 29901

Appellants response to Respondents Defendants Motion to Strike.

S. Craig Molloy
43 Big Woods Dr.
Hilton Head SC 29926

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SC Court of Appeals

And now comes Appellants Island Group Inc. dba Carolina Cleaning of which

S. Craig Molloy was an owner and shareholder.

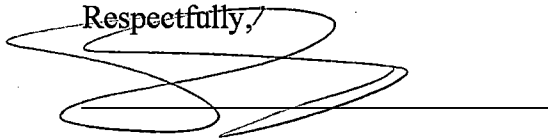
1. This is an appeal from an order (in Error) of the Trial Court Granting Summary Judgement to the Defendants.
2. In the Defendants latest motion they address several “potentially” mis-dated documents entered that have No bearing on the “material facts” in this matter and that exist.
3. The issues of material facts that exist in this case continue to be revealed with regularity.
4. Regarding the Defendants accusation that Appellant has entered new information in to this case is false.

I respectfully request the Appeals Court take special note to items:

- a. In 2017 After many refusals of Foia regarding the funding of the BC-DSN program, only weeks prior to the summary judgement award did the Defendants receive a letter of reprimand from the Governor stating the BC-DSN program is non-compliant (illegal) And to correct the ordinance. This is the same program Defendants used to dismantle bids already awarded to Appellant on a separate contract.
 - b. And now in 2019 and after outside entities and Beaufort County Council has requested reports of Defendants regarding specifics of the BC-DSN program, the defendants choose to report via public and televised forums specifics that differ and contradict their own previous sworn statements in this lower case and appeal.
 - c. For this obvious reason is why the Defendants have received from Appellant a demand for damages as the Defendants have exhausted their excuses and it's become evident they have no Defense in this matter, except perhaps mis-dated documents.
(courtesy copy of demand sent to Appeals Court)
5. Exhibits are in an entire volume of the Record on Appeal and in some case also Second copies are behind the specific affidavits as well, the page are numbered.

6. Defendants willingly report in public televised forums regular material related to this case that contradicts (without question) their sworn testimony which provides evidence that material facts do in fact exist in this case.
7. Appellant is only reporting what Defendants have chosen to put into the public record and forum that is directly related and contradicts their claims that "No material Facts exist"
8. Regarding appellants statements "I'll check with the Appeals Court" this is direct advice from Appeals Court staff.
9. Appellant contends that the Record on Appeal is acceptable and should be understandable to the many well trained Attorneys retained by the Defendants, however if the Appeals Court feels corrections are necessary, Appellant will gladly make any corrections recommended and necessary and do so quickly.

Respectfully,

A handwritten signature in black ink, appearing to be "Craig Molloy", written over a horizontal line. The signature is somewhat stylized and loops back.

Craig Molloy – Pro Se' Appellant
43 Big Woods Dr.
Hilton Head SC 29926
843-368-7300
scmolloy@gmail.com

September 16, 2019

FORM 7
PROOF OF SERVICE OF
Objection to Defendants Motion to Strike

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM BEAUFORT COUNTY
Judge Marvin Dukes – Master In Equity

Appellate Case No. 2018-002170

Lower Case No. 2016-CP-07-01825

Steven Craig Molloy and Island Group, Inc.
d/b/a Carolina Cleaning

Plaintiffs

Of which Steven Craig Molloy is the

Appellant

vs.

Beaufort County Government,
Gary Kubic, Individually, and as Beaufort County Administrator;
Josh Gruber, Individually and as former Beaufort County In-House Attorney;
Bryan Hill, Individually and as former Beaufort County Deputy Administrator;
Shannon Loper, Individually and as employee of the Beaufort County Parks and
Leisure; Stu Rodman, as Finance Chair of Beaufort County Council;
Dave Thomas, Procurement Director Beaufort County, SC.
Beaufort County Disabilities and Special Needs;
Beaufort County DSN Board

Respondents (Defendants)

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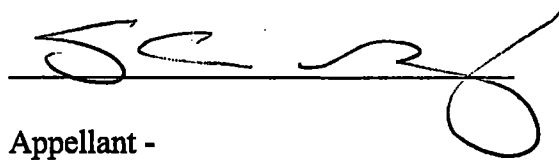
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SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Return of the Defendants Motion to Strike on Beaufort County and the named Respondents (Defendants) by depositing a copy in the United States mail, postage prepaid on September 16, 2019 to the Attorney's for Defendants; John P. Fletcher, Dawes Cooke, Barnwell Whaley Attorney's PO Box H, Charleston, SC 29402 and Attorney Tom Keaveny, Beaufort County Attorney ; PO Box 1128, Beaufort County, SC. 29901.

Sept, 16, 2019



Appellant -
Steven Craig Molloy – Pro se'
43 Big Woods Hilton Head SC 29926
p: 843-368-7300 e: scmolloy@gmail.com

Attorney's for Respondents;
John P. Fletcher, Dawes Cooke
Barnwell Whaley Attorney's
PO Box H, Charleston, SC 29402
and Beaufort County Attorney
Tom Keaveny, PO Box 1128 Beau-
fort County SC 29901

Craig Molloy
43 Big woods Dr. , HHI SC 29926
scmolloy@gmail.com 843-368-7300

9/16/2019

The Honorable Jenny Abbott Kitchings
Clerk, Sc Court of Appeals
1220 Senate St.
Columbia SC 29201

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Re: Appellant response to Respondents suggestion to Strike

Dear Ms. Kitchings,

Enclosed is the appellants response (September 9 2019) to the respondents request of the court to strike appeal.

**If the court finds deficiencies exist that would prohibit this appeal from continuing or being remanded I will gladly make necessary adjustments as quickly as possible.
To strike this appeal will severely prejudice me.**

The defendants suggest I have entered "new material" in this case, this is false. In fact, the respondents "defendants" have chosen to place defendants and their attorneys in the public and on record giving official reports that contradict their sworn affidavits in this matter. The respondents "defendants" were awarded Summary Judgement based on "no material facts existing" and have continued to contradict themselves in every argument, thus I pray the court take special note of their tactics and "material facts do in fact exist exist" and "truth finding has not occurred". This matter should not be in front of the appeals court.

I also pray the court see the defendants strategy to continue and waste precious time and taxpayer money and see fit to:

- a. Award judgement for appellant based on undisputable facts outlined in the recent demand.
- b. Remand this matter to the lower court with new judge.

The Respondents have no defense in this case, answered to nothing and continue to contradict their early statements. This provides ample proof the lower Court's err in awarding summary judgement where material facts exist.

I respectfully request that if the court finds adjustments to the Record are necessary please advise and allow to accommodate.

Thank you.


Craig Molloy



CRAIG MOLLAY
43 Big Woods
Wheat - LEAD SC 29926

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ATTN: Clerk Hon.
Benny Abbott Kitzings
PO Box 11629
Columbia, SC 29211

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