

**BRIEF OF APPELLANT**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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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

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

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Appellate Case No. 2018-002170

**RECEIVED**  
SEP 03 2019  
SC Court of Appeals

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

Plaintiff

Of which Steven Craig Molloy is the

Appellant

v.

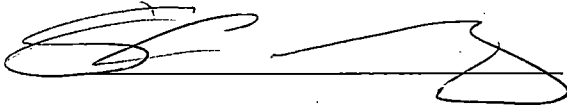
Beaufort County Government,  
Gary Kubic, Individually, and Beaufort County Administrator;  
Josh Gruber, Individually and Former Beaufort County In-House Attorney;  
Bryan Hill, Individually and Former Beaufort County Deputy Administrator;  
Shannon Loper, Individually and Employee of Beaufort County 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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August 29, 2019



Steven Craig Molloy, Pro Se  
43 Big Woods Dr. Hilton Head SC 29926  
p: 843-368-73000  
e: [scmolloy@gmail.com](mailto:scmolloy@gmail.com)

Appellant

Respondents Counsel of Record:

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

**FORM 7  
PROOF of SERVICE**

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

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APPEAL FROM BEAUFORT COUNTY  
Judge Marvin Dukes – Master In Equity

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Appellate Case No. 2018-002170

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Lower Case No. 2016-CP-07-01825

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**RECEIVED**

SEP 03 2019

SC Court of Appeals

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 Administra-  
tor;  
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

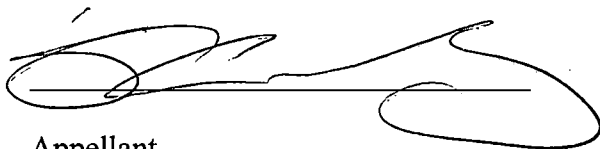
Respondents (Defendants)

## PROOF OF SERVICE

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I certify that I have served the demand letter to Beaufort County and the other named Respondents (Defendants) by depositing a copy in the United States mail, postage prepaid, on August 29, 2019 addressed to their attorney's of record, 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.

August 29, 2019



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

Attorney's for Respondents;

John P. Fletcher, Dawes Cooke  
Barnwell Whaley Attorney's  
PO Box H, Charleston, SC 29402

And BC Attorney Tom Keaveny,  
PO Box 1128, Beaufort County, SC.  
29901.

Craig Molloy  
43 Big Woods Hilton Head, SC 29926  
p: 843-368-7300  
e: scmolloy@gmail.com

8/28/2019

Honorable Jenny Abbott Kitchings  
Clerk of Court - SC Court of Appeals  
PO Box 11629  
Columbia, SC. 29211

**RECEIVED**  
SEP 03 2019  
SC Court of Appeals

RE: SC Court of Appeal # 2018-002170  
Lower Court case # 2016-001825

Dear Honorable Jenny Abbott Kitchings,

Enclosed is a copy of the demand letter sent to Beaufort County for payment for issues related to this matter and before the Court. Your office suggested I copy the Court so they're aware of this demand based on the recent events by the respondents and related directly to this matter.

The respondents made recent televised reports to BC Council that provide undisputed evidence of contradictions and untruths of most all of their previous arguments in this matter, including "No material facts exist" and the "statute on time has passed".

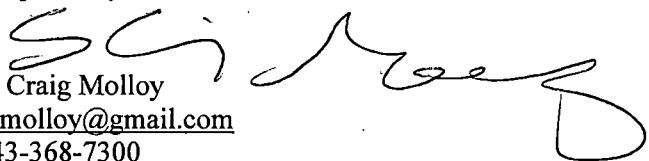
It is now clear without a doubt the respondents strategy has been to stall, answer nothing, submit known untruths to the courts, threaten and retaliate, spin the truth related in this matter. These tactics only continue to waste the Court's time and Taxpayers money.

**With their latest admissions the respondents have contradicted every argument, they have no defense in this matter.** This continues to severely prejudice me.

If respondents choose to ignore or not address the facts and this demand, I am respectfully requesting the Court take special note and perhaps special measures and intervene appropriately with judgement for the appellant, propose settlement commensurate to BC individuals' actions and assign independent investigations as necessary.

I've enclosed eight copies for the Court and a \$ 50.00 filing fee.  
Please contact me with any questions / requests.

Respectfully,

  
S. Craig Molloy  
[scmolloy@gmail.com](mailto:scmolloy@gmail.com)  
843-368-7300

CRAIG MOLLOY  
4333 WOODS DR.  
HILTON HEAD SC 29926

CERTIFIED MAIL



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29211

U.S. POSTAGE PAID  
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RECEIVED

SEP 03 2019

SC Court of Appeals

SC Court of Appeals  
Attn: Hon. Jenny Abbott Kitchings  
PO Box 11624  
Columbia, SC, 29211

8/18

