

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal From Richland County
Jocelyn Newman, Circuit Court Judge

Appellate Case No.:2019-001175

George M. Adams, #181283Appellant,

v.

RICHLAND County Sheriffs DepartmentRespondent.

Appellant's Reply To Respondent's Return

To Appellant's Motion To Restore and

Motion For Enlargement of Time

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The Respondent's Return to Appellant's pro se Motion To Restore and Motion for Enlargement of Time was received by Appellant March 8,2020.

In September of 2019, Respondent's Return To Appellant's Motion To Proceed In Forma Pauperis located at page 3, lines 17-19, presented frivolous and disingenuous defenses in the underlying appeal in violation of rule 11(a) SCACR, and South Carolina Code Ann. subsection 15-36-10 (Supp. 2017), On equitable matters. Runyon v. Wright, 471 S.E.2d 160 (1996). Again in January of 2020, located in Respondent's Initial Brief at the 'Statement of Case', at page 1, lines 4-7 and in the 'Argument' section of the brief, page 3, lines 3-19; page 5, lines 22-24; page 6, lines 1-9, Respondent attacked Appellant's merits of the original complaint by adopting the defense of statute of limitations. The additional sustaining ground Respondent has asserted does appear in Appellant's Record on Appeal. Rule 220(c) SCACR.

Appellant's 'Conclusion' section of the Motion remedy is as follows:

1) Magistrate Peay never signed the arrest warrants June 18, 1992, so why are the warrants rubber stamped to be return to his office? and 2) May 11, 1994 Appellant attorney filed for a preliminary hearing on the arrest warrants, but the hearing was never held to determine rather Magistrate Peay or Womble signed the June 18,1992 arrest warrants.

In Appellants 'Record on Appeal' located at pages 41,42 (exhibit D), pages 47,48,53,54 (exhibit F), pages 55,56 (exhibit G), pages 71,73 (exhibit K), pages 74,75,76 (exhibits L), pages 77-84 (exhibit N), and pages 92-104 circumvents the issuance by above magistrates signing these warrants June 18, 1992. That is why both parties are to be given the right to challenge these particular warrants in the requested preliminary hearing. since the thirty 30 years has expired following Appellants convictions for these charges, Appellant has discovered evidence from these Magistrates office which confirms neither judge signed the arrest warrants on June 18, 1992, and the above Motion to 'Enlarge Time' to reslove the probable cause information, signing, and issuance of the arrest warrants would aid in proving this civil suit.

Respondent now is trying to disregard the litigations they presented in the briefing already filed in this court which Appellant has the right to Reply. Rule 208(a)(3)SCACR and Rule 217, SCACR, also, Rule 240 (F)SCACR. Appellant only is arguing the precedents before this court, and Respondents Return to Appellants Motion To Restore and Motion for Enlargement of Time serves no useful purpose on convincing this court nor any other court Appellant is not entitled to proceed in forma pauperis under South Carolina Code of Laws Title 15, subsection 15-78-10, under South Carolina Magistrate Court Rules 4,5.

Respondent is now trying to confused the court that Appellant is collaterally attacking his conviction, when the complaint and allegations clearly state the relief sought. See 'RECORD ON APPEAL' at pages 4-10.

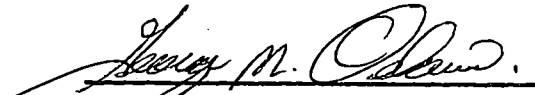
Based on the foregoing, Appellants Motions are to be granted

CERTIFICATE OF SERVICE

THE Appellant pro se, George M. Adams, #181283, does hereby certify that service of Appellants Reply To Respondents Return To Appellant's Motion To Restore and Motion for Enlargement of Times was made upon the Respondent Attorney by placing copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this 10th day of MARCH, 2020:

Andrew F. Lindemann, Esquire
Post Office Box 6923
Columbia, S.C. 29260

George M. Adams, #181283



Broad River Correction Instituti
4460 Broad River Road
Columbia, S.C. 29210

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LEGAL MAIL

George Adams, #181283
Broad River Correction Institution
4460 Broad River Road
Columbia, S.C. 29210

Date: MARCH 10, 2020 **RECEIVED**

The Honorable Jenny Abbott Kitching
Clerk of South Carolina Court of Appeals
Post Office Box 11629
Columbia, S.C. 29211

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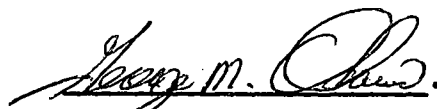
Re: George M. Adams, #181283 v. RCSD
Court of Appeals case #: 2019-001175

Dear Clerk of Court:

Please find enclosed for filing the original and one copy of Appellant's pro se Reply to Respondent's Return To Appellant's Motion To Restore and Motion for Enlargement of Time in referenced to above action. Please file the original and return the copy clocked - in to me in the self addressed envelope enclosed. By way of this letter, I am serving the Respondent's attorney.

THANKS IN ADVANCE!

Sincerely,



George M. Adams, #181283

CC:

Andrew F. Lindemann, Esquire
5 Calender Court, suite 202(29206)
Post OFFICE Box 6923
Columbia, S.C. 29260

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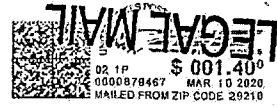
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