

The State of South Carolina Court of Appeals

Appeal from Administrative Law Court

Hon. Ralph W. Anderson III

Appeal No. 2019-002115

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AUG 04 2020

Gregory Paralle, 312332, Appellant
V.

SC Court of Appeals

SC, Dept. of Corrections, Respondent

MOTION FOR OBJECTION

Appellant objects pursuant to Rule 12 SCRCP, to respondents untimely request for extension and respondents untimely initial Brief and Designation of matter. Initial objection was sent by motion to dismiss letter dated July 03, 2020, which this court has yet to respond to.

As explained, the respondents request was filed out of time, as established by this court's letter dated June 04, 2020 [stating Appellants brief was filed May 14, 2020 or certificate of service showing brief was mailed May 07, 2020], which

makes all subsequent filing dates by the respondent out of time and is clearly an error of law.

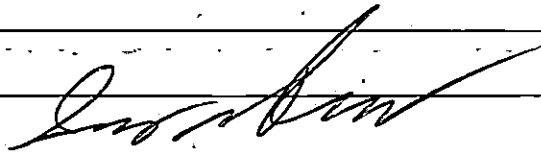
(Maxim of Law) "While the battle continues, he who first leaves the field or refuses to contend loses by default". Failure to timely file is equivalent to abandoning the battlefield and causes loss by default.

Second objection, In all previous filings to this court the Attorney of respondent has clearly been Christina Cates Bigelow, Esq. and yet the untimely Initial brief and designation of matters is filed by Kersey Evers, Esq. As Attorney of respondent. Pursuant to Rule 264(b) SCACR substitution of Attorneys may not occur without justifiable cause, and then only after proper written notice, on petition to and by written order of the appellate court, and with notice to the adverse party. Absent that would be a violation of the court rules and violation of due process. Also, this would make the respondent's initial brief and designation of matter inadmissible as evidence to the court which in turn re-enforces the issue of the respondent's not filing timely. Thus deemed abandoned.

Appellant prays this court grants Appellants

motions for objections and motion to dismiss due
to the error of law and above reasons
supported by the Rules of the Court of
South Carolina.

Date: July 30, 2020



Gregory Perille 312332

Evans CP F4A 275

610 Hwy 9 West

Bennettsville, SC 29512

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Certificate of Service

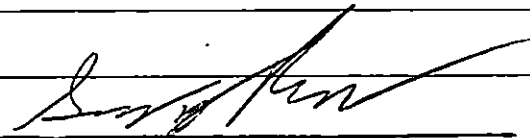
SC Court of Appeals

I hereby certify that the undersigned on the 30th day of July, 2020 in Bennettsville, South Carolina served a copy of Appellant's Motion for objection and motion to stay of time limit due to extraordinary circumstances by depositing the same in the US. mail, postage paid or in the institution's mail room and addressed as follows:

Jenny A. Mitchings, clerk
SC. Court of Appeals
P.O. Box 11629
Columbia, SC. 29211

Christina Catoe Bigelow
SC. General Counsel, SCDC
P.O. Box 21787
Columbia, SC. 29221

Date: July 30, 2020



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