

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

APPEAL FROM BEAUFORT COUNTY
Judge Marvin Dukes – Master In Equity

Appeal Court No. 2018--002170

Lower Court Case No. 2016 CP 01071825

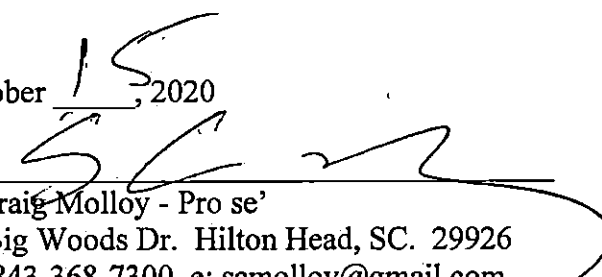
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OCT 22 2020
SC Court of Appeals

Steven Craig Molloy and Island Group, Inc.
d/b/a Carolina Cleaning.....Plaintiffs
Of which Steven Craig Molloy is theAppellant
(for the company and its shareholders)

V.

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
Beaufort County Parks and Leisure; Stu Rodman, as Finance Chair
of Beaufort County Council; Dave Thomas, Procurement Director
Beaufort County, SC. And Beaufort County Disabilities and
Special Needs; Beaufort County DSN Board.....Respondents,

October 15, 2020


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

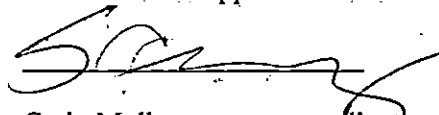
APPELLANTS REPLY TO RESPONDENTS
MOTION TO STRIKE FINAL BRIEF OF APPELLANT

AND NOW COME THE APPELLANT, Pro se' on behalf of Island Group Inc. dba Carolina Cleaning (S corp.) himself and the its shareholders.

- 1.) This is an appeal from a Lower Court awarding Summary Judgement in error to the Defendants:
- 2.) The Appellant has filed this appeal as a pro se litigant on behalf of his company (now closed) Island Group Inc. dba Carolina Cleaning and it's shareholders.
- 3.) Appellant has filed Briefs accordingly per the appeals court rules and any minor infraction had been immediately addressed and corrected immediately.
- 4.) Appellant waits for and appreciates instruction from the Appeals Court of any minor deficiencies that needs attention, and any / all have been minor.
- 5.) In their play by play of the filings the Respondents failed to mention the request of stay to file a 60 (b) for the Defendants fraud upon the courts, where serial untruths and conflicts have continued from day in this matter.
- 6.) For concern of future culpability, damage and danger and as continued conflicting statements from Defendants continue to spew, new County Executives and Attorney have requested (three times) the Appellant submit a verified demand for payment for his and his company losses. Appellant has obliged and expects payment on the verified claims presented to Defendants.
- 7.) The Appellant requests this Court order immediate payment of the Appellants claims as requested by outlying County Executives after confirming the violations and fault by the Defendants where a duty existed and the duty was breached and losses occurred.

CONCLUSION

For the forgoing reasons the Appellants request the Appeals Court order the immediate payment to Appellant for the losses sustained at the hands of the Defendants who have acknowledged fault of violations and duties breached Or rescind this appeal to the lower court or award Judgement to Appellant.

 10.15.20

Craig Molloy – pro se appellant
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SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Judge Marvin Dukes – Master In Equity

Lower Court Case No. 2016-CP070182

Appeal Case No. 2018-002170

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

Of which Steven Craig Molloy is theAppellant
for the shareholders

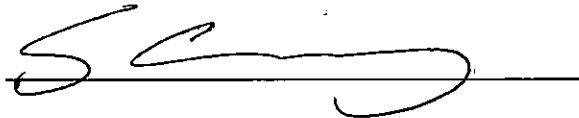
v:

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,

PROOF OF SERVICE

I certify that I served this Brief to the named Respondents, Beaufort County, and their Attorneys' of record, at Barnwell Whaley Patterson & Helms, PO Box H, Charleston, SC 29402 and Beaufort County Attorneys' PO Box 1128, Beaufort County, SC. 29901, by depositing it in the U.S. Mail on the date listed.

10.15 2020



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Attorney's for Respondents;

John P. Fletcher, Dawes Cooke
Barnwell Whaley Attorney's
PO Box H, Charleston, SC 29402
and Beaufort County Attorneys'
PO Box 1128, Beaufort County, SC.
29901

Craig Molloy

10/16/2020
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SC Court of Appeals

TO: Clerk of Court, Honorable Ms. Jenny Abbott Kitchings
PO Box 11629
Columbia, SC. 29211

RE: Case # 2018-002170 –
Island Group Inc. / dba. Carolina Cleaning / Molloy Vs. Beaufort County

Dear Ms. Kitchings,

Please see enclosed for filing hard copies of Briefs (already sent online) per the new filing rules Related to the Covid Pandemic.

These include:

- 1.) Certificate of counsel – for final brief
- 2.) Reply to Respondents Motion to Strike
- 3.) Reply to Respondents Final Brief

Hard copies have been sent to all parties listed as well.

Please call or email if you have questions or issues with these filings or any related to this matter.

Respectfully,


Craig Molloy

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SC Court of Appeals
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Columbia, SC, 29211
ATTN: Ms. Jenny Abbott
Kitchings - Clerk

