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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

FROM LEE COUNTY COURT OF COMMON PLEAS

Honorable Kristi F. Curtis, Judge

Case No.: 2019-000131

Benita Dinkins-Robinson..... APPELLANT

v.

Alan Ratner,..... RESPONDENTS

APPLICATION OF LIBERAL APPLICATION

As a pro se movant, under the supervision of the USDOJ with limited resources the movant is entitled to and contemporaneously invokes the full measure of the liberal pleading and constructive doctrine first expressed in Estelle v. Gamble, 429 U.S. 97 (1976). The doctrine obliges the court to apply the law liberally and with a duty of monstrence under any Instant memorandum of the Law and Motion Pursuant to 28 U.S.C. must be held to a less stringent standard than those drafted by attorney's (Harris v. Kenner) 404 U.S. 519 (1972); Blesdoe vs Johnson, 188 F. 3d 250, 255 (5th Cir. 1999). Further, the allegation raised herein must be taken as true and consequently constructed in light most favorable to movant's position, in any issue not specifically rebutted or which may be procedurally waived by the movant.

Respectful Submitter
Benita Dinkins