

LEGAL MAIL

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM BEAUFORT COUNTY
COURT OF GENERAL SESSIONS
HONORABLE CARMEN T. MULLEN, CHIEF ADMINISTRATIVE PURPOSES JUDGE
LOWER COURT CASE NO:#2006-GS-07-01640, & #01641.

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APR 20 2021

SC Court of Appeals

APPELLATE CASE NO:2020-000110

NATHANIEL JOHNSON, JR. #211574,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT,

MOTION FOR AN PROTECTIVE ORDER FOR AN INTERLUCUTORY INJUNCTION

PLEASE TAKE JUDICIAL NOTICE, THAT MR. NATHANIEL JOHNSON, JR. #211574, WHO IS APPEARING PRO-SE, COMES NOW, AND MOVE FOR AN PROTECTIVE ORDER FOR AN INTERLUCUTORY INJUNCTION TO COMPEL THE RESPONDENTIS TO STOP WITH ITS EXCESSIVE DELAYS WHICH MAY BE VERY PREJUDICIAL TO THE CONSTITUTIONAL RIGHTS AND THE EQUAL PROTECTION OF THE LAW AS JUSTICE IS SO REQUIRED BY THE FOURTEENTH AMENDMENT AND FUNDAMENTAL FAIRNESS CLAUSES. THE PETITIONER HEREBY MOVE WITH HIS MOTION FOR AN PROTECTIVE ORDER TO PREVENT ANY FURTHER HARM, AND ASSERTS THAT THIS REQUEST FURTHER DEMONSTRATES THAT HE HAS AN PROTECTED LIBERTY INTEREST. AN ORDER FOR AN INTERLUCUTORY INJUNCTION WOULD MAINTAIN THE BALANCE OF THE STATUS QUO BETWEEN THE PARTIES PRIOR TO A FINAL DETERMINATION OF OF THE MATTER. PETITIONER RESPECTFULLY ASKS THAT THIS HONORABLE COURT, TO PERMIT AND GRANT THIS PETITION NUNC PRO TUNC, AS A MATTER OF LAW.

RESPECTFULLY SUBMITTED,

DATED: Thurs. April 15th, 2021

1st Mr. Nathaniel Johnson, Jr. #211574
MR. NATHANIEL JOHNSON, JR. #211574
PRO-SE PETITIONER

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NATHANIEL JOHNSON, JR. #211574,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT,

PROOF OF SERVICE

THE UNDERSIGNED COUNSEL HEREBY CERTIFY THAT ON THIS 15th DAY OF April, 2021, A TRUE COPY OF THE PETITIONER'S MOTION FOR AN PROTECTIVE ORDER FOR AN INTERLUCUTORY INJUNCTION AND A COPY OF LETTER, HAVE BEEN SERVED UPON THE RESPONDENT, BY DEPOSITING INTO THE U.S. MAIL POSTAL SERVICE ADDRESSED TO: MR.WILLIAM M. BLITCH, JR. ESQ., OFFICE OF THE ATTORNEY GENERAL, P.O. BOX 11549, COLUMBIA, S.C. 29211.

DATED: 4/15/21

RESPECTFULLY SUBMITTED,

1s/ Mr. Nathaniel Johnson, Jr. #211574
MR. NATHANIEL JOHNSON, JR. #211574

ACL. BAMBERG UNIT F-4 B#26
1057 REVOLUTIONARY TRAIL HWY 47
P.O. BOX 1151
FAIRFAX, S.C. 29827
PRO-SE PETITIONER

DATED: Thurs. April 15th 2021

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SC Court of Appeals

THE HONORABLE CATHERINNI HANNIUM, DEPUTY CLERK
THE SOUTH CAROLINA COURT OF APPEALS
P.O. BOX 11629
COLUMBIA, S.C. 29211

RE: TO RECEIVE AN DATE STAMPED COPY OF THE FIRST AND SECOND MOTION FOR
EXTENSION OF TIME FILED BY THE RESPONDENTS.
NATHANIEL JOHNSON, JR. #211574, -vs- STATE OF SOUTH CAROLINA,
APPELLATE CASE NO: 2020-000110

DEAR MRS. HANNIUM, DEPUTY CLERK:

THE PETITIONER, MR. NATHANIEL JOHNSON, JR. #211574, IS REQUESTING TO RECEIVE
AN DATE STAMPED COPY OF EACH MOTION FOR EXTENSION OF TIME FILED BY THE
RESPONDENT. TODAY, IS APRIL 15TH, 2021, AND FOR THE FIRST TIME, THE PETITIONER
RECEIVED FROM THE RESPONDENTS, IT'S THIRD MOTION FOR EXTENSION OF TIME.

PETITIONER UNDERSTANDS THAT THE RESPONDENT FILED THEIR MOTIONS VIA
ELECTRONIC FILING. BUT, THIS DOES NOT EXCLUDE THE RESPONDENTS FROM PROVIDING
THE PETITIONER AND THE COURT WITH PROOF OF SERVICE. ARE WE UNDER THE SAME
SET OF RULES? PETITIONER HAS ALWAYS COMPLIED WITH THE APPLICABLE RULES BY
PROVIDING AN PROOF OF SERVICE. THIS IS AN OBJECTION TO THIS ACTION OF AN
EX-PARTE COMMUNICATION AND SHOULD ADD FOR THE RECORD, THAT THIS CONDUCT IS
VERY PREJUDICIAL TO THE CONSTITUTIONAL RIGHTS OF THE PETITIONER. THEREFORE,
THE PETITIONER IS FORCED TO FILE AN PROTECTIVE MOTION FOR AN INTERLUCUTORY
INJUNCTION TO PREVENT FUTURE HARM. PETITIONER ASSERTS THAT HE IS ENTITLED
TO EQUAL PROTECTION OF THE LAW, REQUIRED BY THE FOURTEENTH AMENDMENT DUE
PROCESS CLAUSE.

PETITIONER FURTHER UNDERSTANDS THAT WHEN HE FILED THE MOTION TO PROCEED
PRO-SE, IT WAS STATED THAT THE PETITIONER UNDERSTANDS AND ACKNOWLEDGES THE
DANGERS AND DISADVANTAGES OF WAIVING HIS RIGHTS TO APPELLATE COUNSEL.

PETITIONER ALSO UNDERSTANDS THAT ALL PARTIES MUST FULLY COMPLY WITH ALL APPLICABLE RULES. PETITIONER BELIEVES THAT HE IS BEING TAKEN ADVANTAGE OF BY NOT BEING PROVIDED WITH PROOF OF SERVICE FOR THE FIRST AND SECOND MOTION FOR EXTENSION OF TIME FILED BY THE RESPONDENTS. PETITIONER RECEIVED FROM THE ATTORNEY GENERAL'S OFFICE, AN LETTERHEAD TO INFORM ME THAT SUCH MOTIONS WERE BEING FILED. PETITIONER RECEIVED ^{FROM} THE COURT EACH ORDER GRANTING THE MOTIONS FOR EXCESSIVE DELAYS AND EXTENSION OF TIME. IT WAS STATED IN THE LAST ORDER, DATED MARCH 22ND, 2021, THAT THE REQUEST FOR AN EXTENSION OF TIME TO SERVE AND FILE THE BRIEF OF THE RESPONDENT IS HEREBY GRANTED, AND EXTENDED UNTIL APRIL 12TH, 2021, AND ANY FURTHER EXTENSIONS MUST BE BASED ON THE SHOWING OF GOOD CAUSE AND MUST BE SIGNED BY THE APPROPRIATE ATTORNEYS. THIS MOTION FILED AND RECEIVED TODAY, REQUESTING ITS THIRD EXTENSION OF TIME WAS NOT SIGNED BY THE APPROPRIATE ATTORNEY GENERAL MR. ALAN WILSON. PETITIONER RESPECTFULLY ASKS THIS HONORABLE COURT TO PLEASE PROVIDE AN DATE STAMPED COPIES OF EACH MOTION FOR EXTENSION OF TIME FILED BY THE RESPONDENTS.

PETITIONER IS REQUESTING TO RECEIVE AN DATE STAMPED COPY OF THIS LETTER FOR HIS RECORDS. THE RESPONDENT MR. WILLIAM M. BLITCH, JR. SENIOR ASSISTANT ATTORNEY HAVE BEEN SERVED A COPY OF THE SAME ALONG WITH AN PROTECTIVE MOTION FOR AN ORDER FOR AN INTERLUCUTORY INJUNCTION, ON THIS 15th DAY OF April, 2021.

DATED: 4/15/21

RESPECTFULLY SUBMITTED,
/s/ Mr. Nathaniel Johnson Jr. #211574
MR. NATHANIEL JOHNSON, JR. #211574
ACI. BAMBERG UNIT F-4 B#26
1057 REVOLUTIONARY TRAIL HWY 47
P.O. BOX 1151
FAIRFAX, S.C. 29827
PRO-SE PETITIONER

Mr. Nathaniel Johnson Jr. #211574

ACI. Bamberg Unit F-4 B#26

P.O. Box 1151

Fairfax, SC 29827

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APR 15 2021
MAIL ROOM
SC

The Honorable Catherine Hannum, Deputy Clerk

The South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211

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