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APR 29 2021

SC Court of Appeals

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FINAL BRIEF of APPELLANT**

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

APPEAL FROM BEAUFORT COUNTY
Judge Marvin Dukes – Master In Equity

Appellate Case No. 2018-002170

Lower Case No. 2016-CP-07-01825

Steven Craig Molloy
for Island group Inc. dba Carolina CleaningAppellant

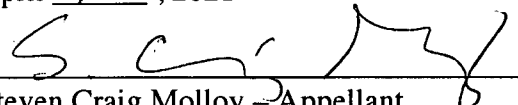
V.

BEAUFORT COUNTY GOVT. ; 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 the Beaufort County Council; and DAVE THOMAS, Procurement Director
for Beaufort County, South Carolina; Beaufort County DISABILITIES AND SPECIAL NEEDS;
and BEAUFORT COUNTY DSN BOARDRespondents

PROOF OF SERVICE

I certify that I have served this Final Brief and notice on the named Respondents by depositing a
copy in the United States Mail, postage prepaid, on 1/9/2019 addressed to their Attorneys of
record as noted below.

April 26, 2021



Steven Craig Molloy –Appellant
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Attorneys for Respondents.
John P. Fletcher, Dawes Cooke Barnwell
Whaley Attorney's PO Box H, Charleston,
SC 29402 and Beaufort County Attorney

Office PO Box 1128, Beaufort County SC
29901

Craig Molloy
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p. 843-368-7300

4.27.2021

TO: The Honorable, Ms. Jenny Abbott-Kitchings
South Carolina Court of Appeals – Clerk
(and the SC Court of Appeals)

RE: Appeals Case # 2018-002170 - Molloy Vs. Beaufort County

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Dear Honorable, Ms. Abbott-Kitchings,

I'm writing to let you know the most recent Final Brief of Appellant I filed is essentially a direct copy of the Initial Brief earlier filed, with only the allowable minor changes.

I understand the Final Brief is to be as exact as possible with the only minor allowable changes.

The allowable changes in the Briefs are noted below:

- a. Spell / Grammar check / date & label
- b. References to the ROA

This matter should not be dismissed upon summary judgement. The rules of civil engagement call for actions after the "harmed party" reasonably discovered the acts. The harmful acts could not have been learned by me until after I learned, by receipt of Foia in 9/2015, of the Defendants true intentions by their conversations and subsequent actions. And after, I timely filed suit with-in the two (2) year statute in 8/2016.

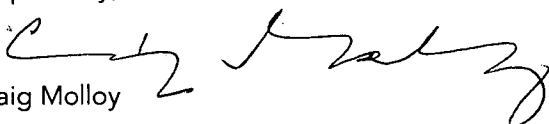
The Defendants claim fails and is an impossibility. I could never have known when on the 6/2014 date, when my company was released from a contract with the Defendants.

I know this honorable Court notices the level of deceit and spin the Defendants continue to raise to fog this matter, and answer nothing. A significant emphasis of late, in legislation, public interest and civil rights violations, related to the ongoing treatment of disabled persons in SC., this matter should not be dismissed.

The Defendants profited from and exploited disabled persons by awarding contracts to an entity that they "Defendants" illicitly gained control of, subsequently putting my 25-year legitimate SC company out of business. The Defendants have answered to nothing and only draw attention elsewhere and to technicalities when their internal emails, documents (and their own recent public statements – not allowed) show intentions and where significant legal questions remain.

This matter should be remanded at minimum, or judgment for the Appellant as demand requested by the Council members and their other "outside" legal advisors of Beaufort County.

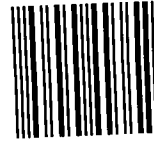
Respectfully,


Craig Molloy

Molloy
43 Big Woods Dr.
Hilton Head, SC 29926



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SC Court of Appeals

SC Court of Appeals
PO Box 11629
Columbia, SC 29211
Attn: Mrs Jenny Abbott-Kitchings
Clerk