IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPELLATE CASE NO. 2020-000974

APPEAL FROM SC COURT OF APPEALS
CASE NO. 2020-001667

APPEAL FROM RICHLAND COUNTY
THE COURT OF COMMON PLEAS
CASE NO. 2006-CP-400-3567 ET AL.,

LAWRENCE L. CRAWFORD AKA JOSIAH
GABRIEL JAH JAH T. TISHBITE

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Appellant / petitioner

Vs.

The State of South Carolina et al.,

Respondent(s)

Affidavit of Facts Giving Judicial Notice; motion to supplement and motion to challenge any claim of mootness; motion for and injunction and OR protective order due to threat of imminent

danger; motion to advance the cause related thereto; motion for a P.R. Bond and motion to motion therefor

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In Re Crawford and the other Appellants invoking the SC Supreme Courts Original Jurisdiction.

To: The SC Supreme Court,
The Kershaw County Court of General Sessions,
The SC Dept of Corrections,

The SC Attorney General et al.,

Here the court and parties will find:

(1) A copy of the letter dated May 26, 2021 from the SC Supreme Court sent to the Kershaw County Court Clerk to inquire about the Appellant/ petitioner being blocked filing pleading before the Kershaw County Clerk since the time of

his conviction.

(2) A copy of the Affidavit of Facts Giving Judicial Notice; motion and OR petition to supplement the initially filed motion and OR petition to invoke the SC Supreme Courts original jurisdiction; motion to supplement the previously filed Affidavit of Non-Frivolous filing; motion for an injunction; motion for Declaratory Judgment and motion to motion Therefor, (a)

pages dated May 24, 2021. This document was already served on the SC Supreme Court, but attached is an additional copy in an abundance of caution.

(3) Exhibit, "Threat of imminent danger #1". This is a copy of the Affidavit of Facts Giving Judicial Notice; motion to acknowledge the withdrawal of a party; motion and/or petition to file in forma pauperis; motion for an extension of time to

file informal BRIEF or functional equivalent pending and motion to motion therefor, (14) pages dated May 20, 2021 that is filed in case 21-1330 in the 3rd Circuit.

(4) Exhibit, "Threat of Imminent danger #2". This is the (12) page SCDC document dated May 4, 2020. By these document and the appellant exposing the actions of ms. McCrae in the Education building

the appellant's life has been placed in mortal danger which is compounded by the matters argued in Exhibit "Threat of imminent danger #1". It is based upon what is alleged that the appellant motions to advance the cause, motions for and injunction and or protective order and it be required that the appellant be immediately removed to the county jail with all of his property without exception none be seized or

confiscated in retaliation with all his legal boxes, with the legal boxes and property he chooses remaining in his immediate possession until final processing out the system. It is also by these documents and that which is to be argued that the appellant seeks a P.R. Bond to also be immediately given since he is no flight risk and the state already defaulted on the conviction under case 2006-CR 400-3567, 3568, 3569 which is also before this court

emerging from case 2020-001667
out of the SC Court of Appeals.

(5) Exhibit, "Yahdiyla".

This is a copy of the forensic
DNA application now filed
within the Kershaw County
General Sessions Court. By
this evidence presented. It
is perspicuous that the appellant
was indeed blocked from the
court in filing and or seeking
that DNA which is supported
by case 2020-001667 now

sought supplemented under case 2020-000974 within the SC SUPREME COURT. The appellant could not file the pleading. The appellants sister was forced to file it on April 15, 2021. The Kershaw Court already has a copy of this document.

Insomuch, what prompted the appellant to file this pleading was the letter issued by the SC SUPREME COURT dated March 26, 2021 where the

only concern or inquiry that was seemingly sought by the letter was whether or not the appellant was deprived opportunity to file his IDPA application which by the attachments it is obvious that this was the case. Nonetheless this was not the only issue. The appellant was concerned that based upon the way the letter was framed it could potentially open the door for an inappropriate ruling of mootness once the court

discovered that the DNA application is now filed. Therefore, it is required that I officially object to any claim of mootness based upon the following facts.

One, the court required that my family file the initial pleading and would not allow me to file it independently of my family's involvement and the appellant would seek to invoke jurisdiction on other jurisdictional matters if the SC Supreme Court's original

jurisdiction was not invoke and the appellant would be subject to a repetitive violation of his substantial due process right of autonomy to proceed alone.

Next, the appellants sister lives in Chicago. There is no telling what restriction would be established against the appellant once she withdraws which is her intent.

Next the issue clearly argued in the initial filing

making up this case did not argue just the blocking of the filing of a DNA application. It was filed arguing also the blocking of the filing of Post conviction Relief application since 2006. Thus this question and issue is attached to claim that the conviction is now void due to this fraud upon the court, obstruction of justice and criminal conspiracy producing Unconstitutional actions voiding

the conviction and the court's jurisdiction which is to be adjudicated under the constitutional prong to subject matter jurisdiction.

Next there is the review sought pursuant to Torrence v. SC Dept. Corrections 2021 by way of the default based upon the procedural processing rule argued under case 2020-001667 appeal to this court invoking its original jurisdiction

As well as under cases 2020-000165; 2021-000309; 2021-000508) the Christopher Wilson case and other pending cases sought consolidation and joint or collective review.

Next there is the issue of the default and monetary Relief the appellant would be entitled to produced from cases 2006-CR-400-3567, 3568 and 3569.

Next there is the issue of the injunction and or

protective order to have the appellant immediately move to the Kershaw County jail and the PR Bond be immediately issued. If the appellants conviction must be deemed void via the default and voiding of jurisdiction emerging from case 2006-CP-400-3567 as is argued in the McCray v. Sequoia, Benjamin case and other appellants cases, including the fact that the state blocked

the filing of my PCR application for 15+ years establishing clear unconstitutional action voiding their jurisdiction related to the conviction. It would defy justice and fairness to allow the appellant to remain in the custody of the SC Dept. of Corrections in light of these substantial DUE PROCESS violations and unconstitutional action. There is Declaratory Relief still pending. Thus moving the appellant out of the SC Dept.

of corrections to the county jail awaiting PR Bond would be the appropriate steps to take also in light of the present threats of imminent danger that this court previously ignored that has culminated, continued, and gotten worse warranting this courts prompt action. Therefore this case cannot be deemed moot though the DNA application via the appellants sister is now actually filed, Randolph v Newsom - Sct --, 2021

WL 1328507 (US 2021); Friends of the Earth Inc v. Laid Law Environmental Services (TOC), Inc, 528 US 167, 120 Sct 693 (US 2000); Uzuegbunam v. Preczewski, 141 Sct 792 (US 2021); Genesis Health Care Corp. v. Symczyk, 569 US 66, 133 Sct 1523, 185 Led2d 636 (US 2013).

There is no "case or controversy" and action becomes "moot" when issues presented are no longer live or parties lack legal cognizable interest

in outcome which is not the case here. The issues are still live and there is a cognizable legal interest in the outcome, Chaplin v Chaplin, 588 US 165, 133 Sct. 1017 (US 2013); and Thompson et al plaintiffs v. Governor of Ohio Michael DeWine et al, defendants, 2021 WL 2264449 (SC Ohio 2021); United States v. Sanchez-Gomez, 138 Sct 1532, 1537, 200 Led2d 792 (US 2018).

A case becomes moot when judgment, if rendered, will

have no practical legal effect upon the existing controversy where in light of the facts now argued this is not the case here. Further, under the exception to the mootness doctrine, if the issue raised is capable of repetition but generally will evade review as it exist in this case by clear probability, the appellate court can take jurisdiction. South Carolina Public Interest Foundation v. South Carolina

Department of Transportation, 421 SC 110, 804 SE2d 854 (SC App. 2017).

Under an exception to the mootness doctrine, an appellate court may decide questions of importance and manifest urgency, like the claim of threat of imminent danger and other matters argued, to establish rule for future conduct in matters of public and or in the appellants interest such as the PCR being blocked also and the unconstitutionality of the conviction

attached to it especially in light of the fact that many of the issues sought REVIEW, as seen in case 2020-000667, are identical to the legal issues defaulted on in the McCray, Sequoia and other appellants cases seeking to invoke the SC SUPREME COURTS original jurisdiction, Bouchelle Incorporated v Charleston Wrecking, Inc., 2019 WL 3946082, * 1 (SCApp. 2019). If not decided on the court record it would have potentially collateral consequences related to the appellants safety, PR Bond, PCR blocking.

and the established default and seeking JURISDICTION RULING PURSUANT to CASES 2006-CP-400-3567, 3568 and 3569 that ARE ALSO NOW PRESENTLY BEFORE the SUPREME COURT, which ISSUES, ARE not decided by whether or not the DNA application was blocked filed, SPENCER v KEMPNA, 523 US 1, 118 SCt 978, 140 LEd2d 43 (US 1998). mootness INQUIRY does not ask if the PRECISE RELIEF sought based on the challenge action is still available, but RATHER, whether the COURT can RENDER ANY EFFECTIVE RELIEF

on the claims made in their totality. Adams v Dunham, 179 F.Supp.3d 632 (S.D.W.Va. 2006).

An action is not moot if litigant will suffer any present, future or collateral consequences of the alleged wrongful conduct, or if a court can provide partial relief where a full remedy may no longer be available. The aforementioned claims argued by the appellant fits within both the categories stated which demonstrate that it would be highly inappropriate and

Abuse of discretion to determine
Now that the DNA application is
filed the controversy is over when
all these substantial claims and
issue remain unresolved giving
way to repetitive wrong doing and
other substantial collateral
consequences to the extreme
prejudice of the appellant that
of course would violate his due
process Rights producing unconsti-
tutional action, United States of
America, plaintiff v Wilfredo Mejia,
defendant, 2021 WL 2143574 (EDC

2021); Curtis v State, 345 SC 557, 549 SE2d 591 (SC App. 2001); Wedlake v Acord, 2021 WL 1291922, *2+ (SC App 2021); Cooper v South Carolina Department of Social Services, 835 SE2d 516, 523 (SC App 2019); State v Cohen, 2019 WL 2025268, *1 (SC App 2019).

Inasmuch, No matter which way this case is reviewed even if the court would determine that since they blocked the filing of the PCR Application for over 15 years denying the Appellant his

one bite at the collateral apple voiding the conviction or the conviction being void due to the state and the SC Dept. of Corrections defaulting under cases 2006-CP-400-3567, 3568 and 3569. All of these are only "legal innocence" claims where the appellant is asserting "actual innocence" claims which can only be proved by the testing of that DNA in the possession of the Kers how County Coroners office and Johnny Jellors the coroner at the time. This don't fly

take into account the monetary relief and declatory relief sought. Thus, CASE 2020-000974 cannot be deemed moot under the aforementioned circumstances.

The appellant motions and or replies his initially filed motion to advance the cause. The appellant initially filed a motion to advance the cause only to have it unjustly ignored by the SC SUPREME COURT to the appellants detriment. Look at the recent attempts on the

Appellants life now. How much more must occur or how long must this case drag on until the harm done becomes irreversible and potentially, obviously, deadly. I renew the motion to consolidate all these related cases including the McCray, case, Sequoia, Wilson, Brown and any other case pending before this court and the honorable SC Supreme Court review these cases collectively in the courts original jurisdiction and give all the Appellants

involved knowledge of its ruling before any further attempts at physical assault and or attempted murder against the appellant occurs. I motion that the Respondents be made to answer within (10) days of Receipt of this document any opposition. If they said I make, that (10) days after, the injunctive relief and protective order be immediately granted and the appellant with all his property, without exception, be moved

to the Kershaw County jail, their solitary, out of population in a single man cell until any necessary subsequent hearing may occur to establish the sought PR Bond and other potential relief. Brannon Poe, CPA, LLC v. Stranglo, SE 2d, 2016 WL 2745274 (SC 2016); State v Broad River Power Company, 164 SC 208, 162 S.E. 74 (SC 1931); Forbes v Dehon, 17 SC Eq. 45, Speers Eq 45, 1843 WL 2962.

A motion to advance the cause in a criminal case must state facts

in such a manner that the court may judge whether the state of South Carolina will be embarrassed in the administration of its affairs by the delay. You have state actors planning potential assassination plots and or physical assaults and a blocking from the court violating due process law exploding over 15 years. To delay any further would be an embarrassment to the state, US v Norton, 91 US 558, 1 OTTO 558, 1875 WL 17934, 23 LEd 250 (US 1875); Central R. Co. v Bourbon County, 116 US 538,

6 Sct 601, 29 L Ed 725 (US 1886);
Gonzalez v Crosby, 545 US 524, 125 Sct 2641, 162 L Ed 2d 480 (US 2005);
National Gas Co. of West Virginia v. Public Service Commission of West Virginia, 55 Sct 646 (mem) (US 1935).

Respectfully,
Jonah The Jishbite

June 8, 2021