

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

RALPH K. ANDERSON, III, ADMINISTRATIVE LAW JUDGE

CASE NO. 2021-000436

DERRICK B. WOODS, #197161


APPELLANT,

V.

SOUTH CAROLINA DEPARTMENT
OF CORRECTIONS,

RESPONDENT.

BRIEF OF APPELLANT



DERRICK B. WOODS
MANNING CORRECTIONAL INST.
502 BECKMAN DRIVE
COLUMBIA, SC 29203

APPELLANT

TABLE OF CONTENTS

	PAGE
TABLE OF AUTHORITIES	2
STATEMENT OF ISSUES ON APPEAL	3
STATEMENT OF THE CASE	3,4
ARGUMENTS	4
I. WHETHER THE ADMINISTRATIVE LAW JUDGE ERRED IN FALLING TO ADDRESS THE MERITS OF APPELLANTS CASE WHERE APPELLANTS CASE SHOWS ERROR OF LAW, VIOLATION OF CONSTITUTIONAL AND STATUTORY PROVISIONS AND VIOLATION OF SCDC POLICY?	4
II. WHETHER THE DECISION OF THE ADMINISTRATIVE LAW JUDGE IS CLEARLY ERRONEOUS IN VIEW OF THE RELIABLE, PROBATIVE AND SUBSTANTIAL EVIDENCE ON THE WHOLE RECORD?	8
CONCLUSION	10
CERTIFICATE OF SERVICE	11

TABLE OF AUTHORITIES

<u>CASES</u>	<u>PAGE</u>
BOLIN V. SOUTH CAROLINA DEPT. OF CORRECTIONS, 415 S.C. 276, 781 S.E.2d 914	5,8
SULLIVAN V. SOUTH CAROLINA DEPT. OF CORRECTIONS, 355 S.C. 437, 586 S.E.2d 124	6
EKKIPER V. SOUTH CAROLINA DEPT. OF CORRECTIONS, 370 S.C. 267, 633 S.E.2d 910	6
AL-SHABAZZ V. STATE, 338 S.C. 354, 527 S.E.2d 742	7
PINCKNEY V. OZMINT, 490 F. SUPP. 2d 670	9
 <u>STATUTES</u>	
SOUTH CAROLINA CODE ANN: § 24-13-210 AND 24-13-230(A)	5,7
SOUTH CAROLINA CODE ANN: § 44-53-375(B) AND 44-53-445	5
 <u>OTHER AUTHORITIES</u>	
OMNIBUS CRIME REDUCTION AND SENTENCING REFORM ACT OF 2010 (ACT NO. 273)	5-9
SOUTH CAROLINA DEPARTMENT OF CORRECTIONS POLICY: OP-21.04 "INMATE CLASSIFICATION PLAN"	6
U. S. . C. A. CONST. AMEND. 14	7

STATEMENT OF ISSUES ON APPEAL

- I. WHETHER THE ADMINISTRATIVE LAW JUDGE ERRED IN FAILING TO ADDRESS THE MERITS OF APPELLANTS CASE WHERE APPELLANTS CASE SHOWS ERROR OF LAW, VIOLATION OF CONSTITUTIONAL AND STATUTORY PROVISIONS AND VIOLATIONS OF SCDC POLICY?
- II. WHETHER THE DECISION OF THE ADMINISTRATIVE LAW JUDGE IS CLEARLY ERONEOUS IN VIEW OF THE RELIABLE, PROBATIVE AND SUBSTANTIAL EVIDENCE ON THE WHOLE RECORD?

STATEMENT OF THE CASE.

THIS CASE IS BEFORE THE SOUTH CAROLINA COURT OF APPEALS PURSUANT TO THE APPEAL OF DERRICK B. WOODS (APPELLANT) AN INMATE INCARCERATED IN THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS (SCDC, DEPARTMENT OF RESPONDENT).

ON APRIL 14, 2020 APPELLANT FILED A STEP 1 GRIEVANCE ABOUT THE MISCALCULATION OF HIS PROJECTED RELEASE DATE. THE STEP 1 GRIEVANCE WAS DENIED. APPELLANT RECEIVED NOTICE JULY 2, 2020. APPELLANT FILED A STEP 2 GRIEVANCE JULY 5, 2020 WHICH THE DEPARTMENT ALSO DENIED. APPELLANT RECEIVED NOTICE OF THE FINAL DECISION SEPTEMBER 3, 2020.

APPELLANT FILED A NOTICE OF APPEAL IN THE SOUTH CAROLINA ADMINISTRATIVE LAW COURT (ALC) SEPTEMBER 25, 2020. THE CASE WAS ASSIGNED - OCTOBER 22, 2020.

APPELLANT FILED HIS BRIEF JANUARY 19, 2021. ON FEBRUARY 9, 2021 RESPONDENT FILED A "MOTION TO ENLARGE TIME TO FILE BRIEF." APPELLANT RECEIVED NOTICE FEBRUARY 11, 2021. APPELLANT FILED A RESPONSE TO RESPONDENTS MOTION FEBRUARY 18, 2021.

ON FEBRUARY 17, 2021 THE ALC FILED AN ORDER GRANTING RESPONDENTS MOTION EXTENDING THE TIME FRAME FIFTEEN (15) DAYS.¹ SEE FOOTNOTE 1 BELOW

THE RESPONDENT FILED ITS BRIEF MARCH 4, 2021. APPELLANT RECEIVED NOTICE MARCH 11, 2021. APPELLANT FILED A REPLY BRIEF MARCH 16, 2021. ON MARCH 25, 2021 THE ALC FILED ITS ORDER AFFIRMING THE DEPARTMENTS FINAL DECISION. APPELLANT RECEIVED THE ORDER APRIL 9, 2021.

APPELLANT FILED A NOTICE OF APPEAL IN THE SOUTH CAROLINA COURT OF APPEALS APRIL 29, 2021. THIS "BRIEF OF APPELLANT" FOLLOWS:

ARGUMENT

I. WHETHER THE ADMINISTRATIVE LAW JUDGE ERRED IN FAILING TO ADDRESS THE MERITS OF APPELLANTS CASE WHERE APPELLANTS CASE SHOWS ERROR OF LAW, VIOLATION OF CONSTITUTIONAL AND STATUTORY PROVISIONS AND VIOLATION OF SCDC POLICY?

THE ADMINISTRATIVE LAW COURT IN ITS ORDER AFFIRMING THE FINAL DECISION OF THE SCDC STATED IN PART: . . . APPELLANTS BRIEF CONTAINS NO ARGUMENT; . . . IS UNSUPPORTED BY CITATION TO LEGAL AUTHORITY; . . . CONSISTS OF APPELLANTS VERSION OF EVENTS; . . . IS CONCLUSORY; . . . IS NOT IN COMPLIANCE WITH SCALC RULES AND THE ADMINISTRATIVE PROCEDURES ACT (CAPA); . . . AND BASED ON APPELLANTS PRO SE ARGUMENTS HIS ISSUES ARE UNMERCITORIOUS AND THUS ABANDONED.

¹ THE RESPONDENTS MOTION TO ENLARGE WAS FILED THE SAME DAY THE BRIEF WAS DUE. THE ALC GRANTED THE MOTION WITHOUT CONSIDERATION OF APPELLANTS RESPONSE AND MADE ITS RULING IN VIOLATION OF SCALC RULE 63. (SEE RESPONDENTS MOTION, APPELLANTS RESPONSE AND THE ALC'S ORDER)

(1) IN HIS BRIEF TO THE ALC APPELLANT ARGUED THAT THE MISCALCULATION OF HIS SENTENCE IS BASED ON AN ERROR OF LAW VIOLATION OF CONSTITUTIONAL AND STATUTORY PROVISIONS AND VIOLATION OF SCDC POLICY.

IN SUPPORT OF HIS ARGUMENT APPELLANT CITED THE 2010 OMNIBUS CRIME REDUCTION AND SENTENCING REFORM ACT (ACT NO. 273) AND THE 2016 SC COURT OF APPEALS AUTHORITY BOLIN V. SOUTH CAROLINA DEPT. OF CORRECTIONS, 415 SC 276, 781 S.E. 2d 914. - SEE APPELLANTS BRIEF AT ARGUMENT I. - SEE ALSO APPELLANTS THREE (3) PAGE ATTACHMENT TO HIS STEP 2 GRIEVANCE.

ACT NO. 273 AMENDED SC CODE ANN: § 44-53-375(B) AND § 44-53-445 AS IT RELATES TO DRUGS WITH AN EFFECTIVE DATE OF JUNE 2, 2010. THE AMENDED LAW RESTORED PAROLE TO OFFENDERS AND ELIMINATED THE OFFENSES CLASSIFICATION AS A "NO PAROLE OFFENSE". THE ACT ALSO MADE OFFENDERS ELIGIBLE FOR EARNED WORK AND EDUCATION CREDITS AND GOOD TIME FOR THE REDUCTION OF THE SENTENCE. - SC CODE ANN: § 24-13-210 AND 230 (A).

APPELLANT IS SENTENCED UNDER § 44-53-375(B) THE SAME LAW AMENDED BY ACT NO. 273. THE SCDC MISINTERPRETED AND FAILED TO APPLY THE AMENDED LAW TO APPELLANTS CASE FROM 2010 TO 2016. APPELLANT ARGUED THAT HE WAS UNLAWFULLY DEPRIVED OF FIVE ANNUAL PAROLE HEARINGS AND THE APPROPRIATE EARNED WORK AND EDUCATION CREDIT LEVELS AND STATUS AND CUSTODY LEVEL STATUS.

IT WAS NOT UNTIL THE CASE OF BOLIN V. SCDC, WHERE THE COURT OF APPEALS RULED THE SCDC'S INTERPRETATION OF THE AMENDED LAW "UNREASONABLE", THAT THE SCDC APPLIED THE AMENDED LAW TO APPELLANTS SENTENCE.

HOWEVER, THE SCDC IN APPLYING THE AMENDED LAW, MADE NO UPGRADES TO APPELLANTS EARNED WORK AND EDUCATION CREDIT LEVEL OR STATUS OR HIS CUSTODY LEVEL. APPELLANT RECEIVED ONLY WHAT WAS IN THE RECORD.

APPELLANT ARGUED THAT THE SCDC'S FAILURE TO TIMELY APPLY THE AMENDED LAW TO HIS SENTENCE FOR DRUGS INFRINGED THE STATUTORY RIGHT TO SENTENCE RELATED CREDITS: SC CODE ANN: § 24-13-230.

THE ONLY WAY FOR THE ADMINISTRATIVE LAW JUDGE DIVISION (ALJD) TO OBTAIN SUBJECT MATTER JURISDICTION OVER A PRISON INMATES CREDENCE CLAIM IS IF IT IMPLICATES A STATE CREATED LIBERTY INTEREST WHICH IS PROTECTED BY THE DUE PROCESS CLAUSE. U.S.C.A. CONST. AMEND. 14 - SULLIVAN V. SOUTH CAROLINA DEPT. OF CORRECTIONS, 355 S.C. 437, 586 S.E. 2d 124

ADMINISTRATIVE MATTERS ENTITLED TO REVIEW BY THE ALJ TYPICALLY ARISE IN TWO WAYS: (1) WHEN AN INMATE IS DISCIPLINED AND PUNISHMENT IS IMPOSED AND (2) WHEN AN INMATE BELIEVES PRISON OFFICIALS HAVE ERRONEOUSLY CALCULATED HIS SENTENCE, SENTENCE RELATED CREDITS OR CUSTODY STATUS. - SKIPPER V. SOUTH CAROLINA DEPT. OF CORRECTIONS, 370 S.C. 267, 633 S.E. 2d 910

(2) APPELLANT ALSO ARGUED THAT HE WAS NOT ASSIGNED TO A JOB OR SCHOOL FOR MORE THAN THREE YEARS WHILE HE WAS HOUSED AT THE EVANS CORRECTIONAL INST. (E.C.I.) AND WAS NOT ENTERED INTO THE OFFENDER MANAGEMENT SYSTEM (OMS) FOR CREDIT FROM 2014 TO 2017.

THE INSTITUTIONAL CLASSIFICATION COMMITTEE (ICC) AT E.C.I. OPENLY REFUSED TO ASSIGN APPELLANT TO A JOB OR SCHOOL AND DID NOT ENTER APPELLANT INTO THE OMS FOR CREDIT FOR MORE THAN THREE YEARS.

SCDC POLICY: OP-21.04, "INMATE CLASSIFICATION PLAN", SECTION 40.1 STATES IN PART SPECIFICALLY: . . . THE ICC WILL BE RESPONSIBLE FOR INMATE JOB ASSIGNMENTS.

"JOB/SCHOOL ASSIGNMENT INFORMATION WILL BE ENTERED INTO THE OMS INDICATING THE INMATES SCDC NUMBER, JOB CLASSIFICATION CODE, EFFECTIVE DATE OF HIRE, JOB LOCATION AND NUMBER OF DAYS/HOURS TO BE WORKED. THE DESIGNATED INSTITUTIONAL EMPLOYEE WILL MAKE APPROPRIATE ENTRIES ON THE EARNED WORK CREDIT/EARNED EDUCATIONAL CREDIT (EWC/ECC) SCREENS OF THE OMS WITHIN THREE (3) DAYS AFTER THE ICC HEARING: SCDC POLICY: OP-21.04, SECTION 40.13

APPELLANT WAS NOT UNDER DISCIPLINARY DETENTION BUT WAS IN THE GENERAL POPULATION WHERE ALL INMATES ARE ASSIGNED TO WORK OR SCHOOL. THE SCDC PROVIDES NO EXPLANATION FOR THE MORE THAN THREE YEARS APPELLANT WAS NOT ASSIGNED TO WORK OR ENTERED INTO THE OMS.

THE VIOLATION OF SCDC POLICY IS UNCONTESTED BY THE ALC AND THE SCDC. LIKEWISE, THE FAILURE OF THE SCDC TO TIMELY APPLY THE AMENDED LAW TO APPELLANT'S SENTENCE IS NOT ADDRESSED.

S.C. CODE ANN: § 24-13-230 PROVIDES IN PART:

(A) THE DIRECTOR OF THE DEPARTMENT OF CORRECTIONS MAY ALLOW AN INMATE SENTENCED TO THE CUSTODY OF THE DEPARTMENT, EXCEPT AN INMATE CONVICTED OF A "NO PAROLE OFFENSE" AS DEFINED IN SECTION 24-13-100, WHO IS ASSIGNED TO A PRODUCTIVE DUTY ASSIGNMENT, INCLUDING AN INMATE WHO IS SERVING TIME IN A LOCAL FACILITY PURSUANT TO A DESIGNATED FACILITY AGREEMENT AUTHORIZED BY SECTION 24-3-20 OR 24-3-30 OR WHO IS REGULARLY ENROLLED AND ACTIVELY PARTICIPATING IN AN ACADEMIC, TECHNICAL OR VOCATIONAL TRAINING PROGRAM A REDUCTION FROM THE TERM OF HIS SENTENCE OF ZERO TO ONE DAY FOR EVERY TWO DAYS HE IS EMPLOYED OR ENROLLED. A MAXIMUM ANNUAL CREDIT FOR BOTH WORK CREDIT AND EDUCATIONAL CREDIT IS LIMITED TO ONE HUNDRED EIGHTY DAYS.

THE APPELLANT IS ELIGIBLE FOR THESE SENTENCE RELATED CREDITS AND SHOULD HAVE RECEIVED THE APPROPRIATE UPGRADED CREDITS AND CUSTODY LEVEL AND STATUS. AGAIN, THE SCDC ONLY PROVIDED CREDIT FROM THE RECORD WHICH WAS SUBSTANTIALLY LOWER THAN WHAT APPELLANT SHOULD HAVE BEEN EARNING.

THE STATUTORY RIGHT TO SENTENCED RELATED CREDITS IS A PROTECTED LIBERTY INTEREST UNDER THE FOURTEENTH AMENDMENT ENTITLING AN INMATE TO MINIMAL DUE PROCESS TO ENSURE THE STATE CREATED RIGHT WAS NOT ARBITRARILY ABROGATED. - U.S.C.A., CONST. AMEND. 14; S.C. CODE 1976 §§ 24-13-230. AL-SHABAZZ V. STATE, 338 S.C. 354, 527 S.E.2d 742

THE ALC CLEARLY SHOULD HAVE ADDRESSED THESE ISSUES BECAUSE THEY IMPLICATE A STATE CREATED LIBERTY INTEREST AND APPELLANT CERTAINLY HAD AN INTEREST IN BEING RELEASED AT THE SOONEST POSSIBLE TIME.

ARGUMENT

II. WHETHER THE DECISION OF THE ADMINISTRATIVE LAW JUDGE IS CLEARLY ERRONEOUS IN VIEW OF THE RELIABLE, PROBATIVE AND SUBSTANTIAL EVIDENCE ON THE WHOLE RECORD?

THE ALC'S ORDER AFFIRMING THE SCDJ'S DECISION STATES IN PART: . . . APPELLANT'S BRIEF CONTAINS NO ARGUMENT; IS UNSUPPORTED BY CITATION TO LEGAL AUTHORITY; . . . CONSISTS OF APPELLANT'S VERSION OF EVENTS; . . . IS CONCLUSORY; . . . THAT APPELLANT HAS RECEIVED ALL THE CREDITS HE IS ENTITLED TO; . . . AND BASED ON APPELLANT'S PRO SE ARGUMENTS HE IS NOT IN COMPLIANCE WITH SC ALC RULES OR THE APA AND HAS ABANDONED HIS ISSUES. - SEE ALC'S ORDER OF MARCH 25, 2021

APPELLANT, IN HIS BRIEF TO THE ALC OPENED HIS ARGUMENT STATING IN PART THAT HIS CASE WAS BASED ON AN ERROR OF LAW, VIOLATIONS OF CONSTITUTIONAL AND STATUTORY PROVISIONS AND VIOLATION OF SCDJ POLICY. - SEE "BRIEF OF APPELLANT" TO THE ALC AND "REPLY BRIEF"

IN SUPPORT OF HIS ARGUMENT APPELLANT CITED THE 2010 OMNIBUS CRIME REDUCTION AND SENTENCING REFORM ACT, ACT NO. 273 WHICH AMENDED THE STATUTE § 44-53-375(B) AND § 44-53-445 AS IT RELATES TO DRUG POSSESSION.

APPELLANT IS SENTENCED UNDER § 44-53-375(B) AND 44-53-445 SHOWING THE DIRECT APPLICATION OF THE 2010 AMENDED LAW TO HIS SENTENCE.

APPELLANT ALSO CITED THE AUTHORITY BOLIN V. SOUTH CAROLINA DEPT. OF CORRECTIONS, HIS S.C. 276, 781 S.E. 2d 914 WHERE THE COURT OF APPEALS RULED THE SCDJ'S INTERPRETATION OF THE AMENDED LAW WAS UNREASONABLE.

APPELLANT ARGUED THE FAILURE OF THE SCDJ TO TIMELY APPLY THE AMENDED LAW TO HIS SENTENCE FOR DRUGS UNLAWFULLY DEPRIVED HIM OF FIVE ANNUAL PAROLE HEARINGS AND THE APPROPRIATE EWC/EEC AND CUSTODY LEVELS AND STATUS FROM THE EFFECTIVE DATE JUNE 2, 2010 TO MARCH 2016. - SEE APPELLANT'S BRIEF AND REPLY BRIEF.

APPELLANT PUT FORWARD THE SAME ARGUMENT IN HIS STEP 2 GRIEVANCE PARTICULARLY HIS REFERENCE TO THE ATTACHED THREE PAGE LETTER WHICH DETAILED WHAT APPELLANT BELIEVED WERE THE REASONS FOR THE MFS CALCULATION OF HIS RELEASE DATE. - SEE APPELLANTS STEP 2 GRIEVANCE AND THE ATTACHED THREE PAGE LETTER.)

THE RESPONDENT FILED A RECORD OF THE CASE IN THE ALC DECEMBER 29, 2020 WHICH INCLUDED APPELLANTS LETTER AND GRIEVANCE HISTORY. RESPONDENT ALSO MOTIONED AND FILED A SUPPLEMENTAL RECORD MARCH 4, 2021 WHICH INCLUDED APPELLANTS EWC / EEC HISTORY. - SEE RESPONDENTS RECORD OF DECEMBER 29, 2020 AND RESPONDENTS MOTION TO SUPPLEMENT THE RECORD MARCH 4, 2021.)

APPELLANTS EWC / EEC HISTORY CLEARLY SHOWS A RECORD OF A MORE THAN THREE YEAR LAPSE IN APPELLANTS WORK HISTORY. APPELLANT ARGUED THAT THE ICC AND THE SCDC FAILED TO ASSIGN HIM TO WORK OR SCHOOL FOR MORE THAN THREE YEARS IN VIOLATION OF CONSTITUTIONAL AND STATUTORY LAW AND DEPARTMENT POLICY. THE RECORD CLEARLY REFLECTS THIS.

THE 2010 OMNIBUS CRIME BILL, ACT NO. 278 DIRECTLY EFFECTED APPELLANTS SENTENCE. THE SCDC DID NOT APPLY THE AMENDED LAW TO APPELLANTS SENTENCE UNTIL 2010 AFTER THE RULING IN BOLIN V. SOUTH CAROLINA DEPT. OF CORRECTIONS. THESE FACTS AND PROOFS INDISPUTABLE AND CLEARLY ESTABLISHED BY THE RECORD.

APPELLANTS ARGUMENTS IN HIS BRIEFS TO THE ALC ARE NOT A MERE VERSION OF EVENTS OR CONCLUSORY BUT FACTUAL, PROBATIVE AND SUBSTANTIAL EVIDENCE SHOWING PRECISELY THE VIOLATIONS.

THE ALC'S ASSERTION OF NON-COMPLIANCE WITH SCALC RULES OR THE APA OR IN SUFFICIENCY BECAUSE OF APPELLANTS PRO SE REPRESENTATION IS ERRONEOUS.

IT IS WELL SETTLED THAT PRO SE FILINGS ARE HELD TO A LESS STRINGENT STANDARD THAN DOCUMENTS PREPARED BY AN ATTORNEY AND COURTS CAN CONSTRUCT PRO SE FILINGS LIBERALLY.

PINCKNEY V. OZMINT, 490 F. SUPP. 2d 670

AS A RESULT OF THE S DC'S ACTIONS AND DECISIONS THE SUBSTANTIAL RIGHTS OF THE APPELLANT HAVE SUFFERED PREJUDICE . APPELLANT SHOULD BE GRANTED PART OR ALL OF THE REQUESTED RELIEF SOUGHT THROUGHOUT THE COURSE OF HIS CASE


THE DECISION OF THE ALC IS NOT SUPPORTED BY THE RECORD AS A WHOLE AND THERE IS NO SUBSTANTIAL EVIDENCE TO SUPPORT THE ALC'S FINDINGS. THIS COURT SHOULD FIND THE ALC'S DECISION TO BE CLEARLY ERRONEOUS IN VIEW OF THE RELIABLE, PROBATIVE AND SUBSTANTIAL EVIDENCE ON THE WHOLE RECORD.

CONCLUSION

FOR THE REASONS STATED, THIS COURT SHOULD REVERSE THE DECISION OF THE ADMINISTRATIVE LAW COURT.

I RESPECTFULLY SUBMITTED,

AUGUST 6, 2021


DERRICK B. WOODS, 197161
MANNING CORRECTIONAL INST.
502 BECKMAN DRIVE
COLUMBIA, SC 29203

APPELLANT

STATE OF SOUTH CAROLINA
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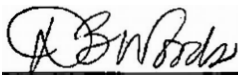
RESPONDENT.

CERTIFICATE OF SERVICE

I, DERRICK B. WOODS CERTIFY THAT I HAVE ON THE 6TH DAY OF AUGUST 2021 SERVED THE "BRIEF OF APPELLANT ON THE COURT OF APPEALS AND THE RESPONDENT BY DEPOSITING IT IN THE UNITED STATES MAIL VIA THE PRISON MAIL ROOM POSTAGE PREPAID ADDRESSED AS FOLLOWS:

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
OFFICE OF GENERAL COUNSEL
P.O. BOX 21787/4444 BROAD RIVER RD.
COLUMBIA, SC 29221-1787

JENNY ABBOTT KITCHINGS, CLERK
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET
COLUMBIA, SC 29201


DERRICK B. WOODS
MANNING CORRECTIONAL INST.
502 BECKMAN DRIVE
COLUMBIA, SC 29203

APPELLANT

AUGUST 6, 2021