

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM THE Administrative Law Court DEC 06 2021

Administrative Law Judge S. Phillip Lenski
SC Court of Appeals

ALC CASE No. 2021 - ALJ-04-0164-AP

Appellate Case 2021 - 000 879

James Anthony Primus 252315

Appellant

v

South Carolina Department of Corrections

Respondent

MOTION JUSTICIABLE CONTROVERSY Code 1976-15-53-30

Appellant respectfully request to move for and a Justiciable
Controversy is a real and Substantial Controversy is a Real and
Substantial Controversy which is RIFE and Appropriate for Judicial
determination as distinguished from a contingent hypothetical or
abstract dispute Collaton County Taxpayer Assn. v School District of
Collaton County Supreme Court of South Carolina December 11 2006 371 SC

224 638 SE 2d 685

Conclusion

Wherefore Appellant Request that this Sentence sheet Be Corrected by
and Judicial official and not and executive Agency

December 2 2021

Respectfully Submitted
James Anthony Primus 252315
1516 Old Gilliland Rd
20117

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM THE Administrative Law Court

Administrative LAW JUDGE S. Phillip Lenski

ALC Case No. 21-ALS-04-0164-

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SC Court of Appeals

James Anthony Primus 252315

Appellant

v

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS Respondent

Certificate of Service

Under signed Appellant Pro Se hereby certifies that on today's date I mailed a copy of the Initial Reply Brief of Appellant and Designation of matter to be included in the Record on Appeal and Financial Records since the beginning of Appellant Incarceration to the Respondents and motion Justiciable Controversy to the following individual below

S.C. Court of Appeals
Clerk office
1220 Senate St.
Columbia S.C. 29201

S.C. Dept. of Corr.
General Counsel
4444 Broadriver Rd
Columbia S.C. 29211

S.C. Administrative Law Court
Clerk office
1205 Trade Center St
Columbia S.C. 29201

December 2 2021

By

James Anthony Primus 252315
James Anthony Primus Pro Se
1516 old Gilliland Rd
Ridgewood S.C. 29122

James Anthony Primus 252315
Mac Dougall Correctional Institute
Birch 1 B 13A
1516 Old Billiard Road
Bridgeville S.C. 29472
December 2 2021

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SC Court of Appeals

Honorable Jenny A. Kitchings

Clerk of Court ~~S.C. Court of Appeals~~

1220 Senate Street

Columbia S.C. 29201

RE: James Anthony Primus 252315 v SCDC
ALC Docket No. 21-ALJ-04-0164-AP
Appellate Case No. 2021-000879

Dear Clerk, Ms Kitchings

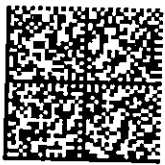
Enclosed ~~please find the~~ Initial Reply Brief of Appellant
and Designation of matter to be included in the Record on
APPEAL in the above captioned case along with a Justiciable
Controversy motion, Certificate of Counsel and Proof of Service
I would like to thank you in Advanced

Sincerely

James Anthony Primus

James Anthony Polmus 252315
MACDOWELL Correctional Institution
Box 1 B 13 A
1516 Old Gilliard Rd.
Ridgville S.C. 29472

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