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S.C. SUPREME COURT

EXHIBIT A-11

A

STATE OF SOUTH CAROLINA

COURT OF COMMON PLEAS

COUNTY OF RICHLAND

2020-CP-40-1593

Linda Ann Tyler #248180

THE (APPLICANT) submits this Brief

VS

IN OPPOSITION OF THE STATE'S

MOTION FOR SUMMARY JUDGMENT

& ORDER OF DISMISSAL OF PCR

THE STATE OF SOUTH CAROLINA

Ground 2

THIS IS A PRIMA FACIE CASE OF ACTUAL INNOCENCE OF THE MURDER OR DEATH OF VAN TYLER, SR.

TO SHOW THE CAUSE AND THE MISSING LINK THE (APPLICANT) CITES THE FOLLOWING FACTS.

THE (DECEASED) WAS A TERMINALLY ILL PERSON.

THE FAMILY OF THE (DECEASED) LEFT A NOTE AT THE NURSES STATION, NOT TO (RESUSCITATE) THE (DECEASED) IF HE SHOULD EXPIRE. ACCORDING TO (S.C. CODE, ANN. LAW) 1976-44-77-30

OR RELINQUISHMENT. THE (DECEASED) FAMILY MADE THAT CHOICE WITHHELD OR WITHDRAWN FROM A (PATIENT) WHO HAS A

(TERMINALLY-ILLNESS): ACCORDING TO (44-77-30). SEE ALSO SECTION (44-77-50) - 44-77-40.

THE PERSON PRESENT CONDITION IS CERTIFIED TO BE (TERMINALLY OR TO BE IN A (STATE) OF PERMANENT UNCONSCIOUSNESS) BY TWO

PHYSICIANS, WHO PERSONALLY HAVE (EXAMINED) THE (DECLARANT), ONE OF WHO IS THE (DECLARANT) THE

ATTENDING PHYSICIAN, AND THE OTHER OF WHOM IS A PHYSICIAN, OTHER THAN THE ATTENDING PHYSICIAN. SUCH

LIFE SUPPORT PROCEDURES MAY BE WITHHELD, UPON THE DIRECTION, AND UNDER THE SUPERVISION OF THE ATTENDING PHYSICIAN

A (CERTIFICATE BASED ON (PERMANENT UNCONSCIOUSNESS) FOR AT LEAST (90) NINETY DAYS.

# EXHIBIT A-II

A-II

STATE OF SOUTH CAROLINA	COURT OF COMMON PLEAS
COUNTY OF Richland	2020-CP-40-1583
Linda Ann Tyler #248190 vs. THE STATE OF South CAROLINA	THE (APPLICANT) Submits this RESPONSE & REPLY BRIEF, by ORDER OF THE COURT, TO SHOW CAUSE AS TO WHY THIS CLAIM SHOULD NOT BE (DISMISSED)

The above-captioned (APPLICANT) hereby moves upon the above court, to show cause as to why this claim should not be dismissed.

FOR A FIRST DEFENSE:

The Atty. Gen. in acting over this (P.C.R.) claim, has slept on her time, in which to file and or to submit, a Reply back to me and the courts, pursuant to the S.C.R.C.P. Rule 12, The (STATE) must Respond to the (P.C.R.) claim (60) sixty days, if arises out of a (JURY TRIAL) and (90) ninety days if arises out of a (GUILTY PLEA).

Pursuant to (18. U.S.C.A. 3161 (H) (8) (C)) in lieu of (18. U.S.C.A. - 3161 (H) (8) (A)) EX PARTE NIX MOTION

The (STATE) has not filed any NOTICE OR MOTIONS upon the court, for and extension of time in which to Reply or to Respond to this (P.C.R.) claim. The STATUTE OF limitation has expired, THE STATE HAS FAILED TO (OFFICIALLY) NOTIFY-THE-COURT, OF ITS NEED FOR A Delay in which to Respond to this case et bar. There is nothing on the face of the record in writing, showing the STATE making any MOTION FOR ENLARGEMENT OF time, to Reply.

ASD

STATE OF SOUTH CAROLINA

COURT OF COMMON PLEAS

COUNTY OF RICHLAND

2020-CP-40-1593

Linda Ann Tyler #248-190  
vs

The (Applicant) submits this  
Brief in opposition of the STATE'S  
MOTION FOR Summary Judgement  
Order to Dismiss (P.C.R.) claim

THE STATE OF South Carolina

at any time, of the (Declarant), has experienced (massive) (Distraction) or (atrophy) of the (Cortex) as (evidence) by (Neurodiagnostic) studies or (Gross) inspection of the (Brain) or some other characteristic of the (Declarant) conditions allow a (Diagnosis) of (Permanent) (Unconsciousness) to be made with a (High-Degree) of (Medical)-(Certainty)

Pursuant to (S.C. Code Ann Law) 1976-44-77-30-S.C. ST.-44-77-30. 2021 ACT NO. 116). FOR NATURAL DEATH)

~~The 44-CHAPTER 77 CODE 1976 37-44-77-100 S.C. ST. 44-77-100~~

The (Applicant) states that (she) did NOT CAUSE the (Death) of (Van Tyler, Jr). The Death was caused by the attending Physicians, in lieu of family orders to DO NOT Revive.

Final Argument:

Van Tyler, Jr, did NOT sign any WRITTEN NOTICE for the hospital to withhold medical care and TREATMENT because he was deprived of life support, according to S.C. Code Ann Law) 1976-44-77-30-S.C. ST.-44-77-30 2021 Act. NO. 116. DEATH is DECLARED - A NATURAL DEATH REMOVAL OF LIFE SUPPORT, THE (DECEASED) MUST BE A (TERMINALLY) (ILL) (PATIENT) Pursuant to (198H-915) Substitute Judgement exists, Role of Court, Physicians Guardian, Family or others. The (Right-to-Die) WAS NOT MADE by (Van Tyler, Jr) but his (Family).

EXHIBIT A-4

A  
W

STATE OF SOUTH CAROLINA	COURT OF COMMON PLEAS
COUNTY OF RICHLAND	2020-CP-40-1593
Linda Ann Tyler	THE (APPLICANT) SUBMITS THIS
VS	BRIEF IN OPPOSITION, TO THE STATES
THE STATE OF SOUTH CAROLINA	MOTION FOR CONDITIONAL DISMISSAL
	AFFIDAVIT OF SERVICE

Re. Burns, statement, TRIAL TRANSCRIPT AT (PAGE 318) LINE, 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, →. MEDICAL RECORDS, AT 318, LISTED (R H ABDOMYOLYSIS) AS CAUSED OF DEATH, CONFESSED ON STAND, - LUNGS WERE CLEAR.. SEE TRIAL TRANSCRIPT AT (PAGE 314) (LINE-6) DID NOT INDICATE "CARBON MONOXIDE". Q - I THINK IN YOUR REPORT, IT INDICATES THAT (NO-SOOT) OR FOREIGN MATTERS WAS, (IDENTIFIED) IDENTIFIED FROM THE LUNG, RIGHT? ANSWER (A) RIGHT-UN-WH. (LINE 25) OF (PAGE 314) THEY DID NOT (INDICATE) CARBON MONOXIDE- AT-ALL. Respectfully  
 Submitted  
 [Signature]  
 November 2021

Sworn to and subscribe before me  
 On this 25th DAY OF NOVEMBER 2021

NOTARY PUBLIC FOR THE STATE OF SOUTH CAROLINA

[Signature]

My COMMISSION EXPIRES / 1/1/24

[Signature]

EXHIBIT - B -

B  
1

STATE OF SOUTH CAROLINA	COURT OF COMMON PLEAS
COUNTY OF Richland	2020-CP-40-1593
Linda Ann Tyler #248490 VS.	The (Applicant) files this NOTICE & MOTION, TO (DISQUALIFY) Judge, (L. C. MANNING) FROM Presiding over this (P.C.R.) AFFIDAVIT OF SERVICE
THE STATE OF South Carolina	

~~Being~~ The (Applicant) files this NOTICE and MOTION to (DISQUALIFY) Judge (L.C. Manning) From Presiding OVER this case for bar, (S.C.R. RCP. Rule 63)

The (Applicant) states that (Judge Manning) had (PRIOR) POSSESSION OF HER (FORMER P.C.R. CLAIM) and merely accepted the STATES' motion for summary judgement absent an EVIDENTIARY hearing.

The (Applicant) is entitled to an order assigning the consideration of this motion, to another judge

The (Applicant) is entitled to (RECESAL) OF (Judge) (L.C. Manning) with respect to the (P.C.R. matter, in this court, quoting - Christy - V - Christy, (S.C. App. 2001)

The duty of the (undersigned Judge) under these circumstances is to determine, whether the (motion) is timely, whether the AFFIDAVIT is legally sufficient and whether (RECESAL) would be warranted, Assuming that the (allegations) of the (AFFIDAVIT) were true.

Respectfully,  
 C. C. Submitted 2/14/21  
 Judge, Lacy C. Manning Linda Ann Tyler  
 Atty. Gen. Jasmeen G. Khan November 2020

SWORN TO AND SUBSCRIBE BEFORE ME  
 ON THIS (2) DAY OF NOVEMBER 2021  
 NOTARY PUBLIC FOR THE STATE OF SOUTH CAROLINA  
 (Signature) \_\_\_\_\_  
 MY COMMISSION EXPIRES / (Signature)

Ground Three, EXHIBIT B-2

TRIAL JUDGE PAUL E. SHORT JR. STATE IN THE COURTS (COLLUSY)  
TRIAL TRAN. ON PAGE THAT

B/2

Denied the use of Hypnosis and Denied the use  
of Sodium Pentothal (SOD) <sup>which came into effect Jan. 1, 1966</sup> <sup>governor</sup> <sup>delete</sup>  
USE of PAUL and Act. (Law) <sup>TRIAL JUDGE</sup> SENTENCE  
Subsequently, to that <sup>TRIAL JUDGE</sup> SENTENCE  
the (Applicant) on the finding of the jury (16-3-10)  
and added additional statutes of code offense  
16-45-1 (16-20) whereas the trial judge did not  
charge the jury or give jury instructions, & sentence  
the (Applicant) under (2) other offense code,  
Trial Judge, failed to issue an arrest warrant  
for (crown) F.R. SR, who was subpoena to testify  
because the F.R. III the coroner, altered the  
Death Certificate.

Final argument:

Trial Judge Paul E. Short, Jr., was also one  
of the judges presiding over the (Applicant) appeal  
on the denial of her (P.R.) claim, in the  
South Carolina Supreme Court

Collared Fair:  
The Statute of Limitation, is also an issue on the  
merits of the (Atty. Gen.) deliberate delay reply to this  
claim. The claim was filed in (March) 1968 and the responsive  
just internal reply was in October 1968, approximately  
10 One year (6) set months. 20+ days late in violation of  
rule 13.

# Summary Judgment MOTION TO Dismiss

IS NOT applicable in this case at. Based on the following facts. After discovered evidence, of Treaty Torts errors. Sentencing Code Violation, Denial of Ground one. Due Process under 14th Amendment

When a STATE Statute is in conflict with a Federal Civil protected Right, that is guaranteed to the (Defendant) it supersedes the state Statute or State Constitution.

The 5th Amendment U.S.C.A Rights to Confrontation of the Accused was violated, when (Cornelia Frank E. Brown) failed to appear in court, after (F.E. Still) court Altered the (Augusta Burns Center) DEATH Certificate, which was sign and registered by (Dr. Joseph M. Still Jr.).

Ground Two. Defense Atty. (Prejudice) the (Applicant's) TRIAL, which they both, failed to have (Dr. Joseph M. Still Jr.) appear in court, to give and open court testimony as to the CAUSE OF DEATH of VAN TYLE JR, whereas (Dr. J. M. Still Jr.) sign DEATH certificate as (UNKNOWN) list (R) which is caused my my goblin with Blood in the URETHRA. Can subsequently to that, Defense Atty. deprive the (Applicant) other (Rights) to HAVE (Daughter) under 50 (Hypnosis) to REcollect her memory of what (VAN TYLE JR) did to her (sexual assaulted - sodomized, RAPE AND) (WAL) sex the minor child. SEE TRIAL TRANS ON PAGE 7. In addition with that, the (Applicant) requested to use the (Sodium Pentothal shot) to prove that, she did not planned a plot the (DEATH) of VAN TYLE JR, AND that (she) DECEASED ALSO (sodomized) her as REVENGE for having an (Illegitimate baby) who is (JASMINA) the (A'YA) baby conceived while (VAN TYLE JR) was at Manning F. Denied A Right to A FAIR TRIAL.

IN SHA ALIHLIF JEHOVAH God IS WITH US  
Amen

Return of motion to DISMISS.  
Conditional Order OF Dismissal

March 17-6-2020 - Respond on October 9<sup>th</sup> 2021

For a First Defense.

The AFTER-DISCOVERED EVIDENCE IS GENUINE.  
The (Applicant) was denied the rights to use  
Hypnosis and Sodium Penthal shall, on the  
onset of chemical. Judge Short, denied the motion  
See TRUTH, Transcripts at.

For A Second Defense-

Truth Judge sentence the Petitioner under  
(3) separate sentencing code, in violation  
of the U.S. Const. Amend. Double jeopardy statute  
(17-25-45) (-16-3-10) (6-3-20) Monetary Gains  
not charged to the jury.

For A Third Defense-

State-witness, Frank & Bauer III was supposed  
to appear, failed to appear, trial process, why he  
alleged to live Death Certificate issued from Oregon.

For A Fourth Defense

Pathologist appeared absent the physical  
evidence of Autopsy photographs, slides, used  
a body chart.

For A Fifth Defense: Denied Discovery of Autopsy  
The State Alleged Autopsy Photo were available,  
yet NONE existed, at Truth a in the Discovery

Den

FOR A SIXTH DEFENSE

Sentencing Judge Paul & Short, Jr. was one of the judges on the Supreme Court, denying the (P.C.R.) in lieu of appellate defense atty. K. Hodgson, who was one of the (Public Defender) who, Doug Strickler, had working with him on the case, before I fired him.

FOR A SEVENTH DEFENSE:

The (Applicant) filed this (P.C.R. on March 18<sup>th</sup> 2020)  
The (Respondent) failed to file a Reply within the (90) days pursuant to ASJURY TRIAL.

Failed to file a motion for EX PARTE NIX, for enlargement of time in which to reply to the claims pursuant to 18. U.S.C.A. 3162(H)(8) A) 3161 (H)(A)(C)

Quoting -> Holland - v - Florida, 560, U.S. 631, 2010  
Citing -> U.S. - v. Lawrence, 549 U.S. At. 332.

Summary Judgment must be granted to the (Applicant) base on extraordinary circumstance to justify telling of the (Respondent's) misconduct it would be unconstitutional to enforce the statute of limitation against the (Applicant) and NOT against the (Respondent). The principal part of the matter in this case at bar, is that

The (Deceased) was not Autopsy - there is NO physical photo's of body being Autopsy. Showing Van Tyler, Jr. face-back in body. who witness the Autopsy. where is the video, camera on the body being Autopsy. it is not in the actions.

Att. Gen.

Exhibit - C,

1

STATE OF SOUTH CAROLINA

COURT OF COMMON PLEAS

COUNTY OF RICHLAND

2020-CP-40-1593

Linda Ann Tyler # 848-190

THE (APPLICANT) FILES THIS NOTICE & MOTION, FOR THIS CASE TO BE (RE-ASSIGNED)

VS

TO ANOTHER JUDGE. Rule 5a b

THE STATE OF SOUTH CAROLINA

AFFIDAVIT OF SERVICE

THE (APPLICANT) FILES THIS NOTICE AND MOTION, FOR (JUDGE) (L. C. MANNING) TO BE REMOVED, OFF THIS CASE, BASED ON THE FACT THAT, (JUDGE MANNING) HAD PRIOR POSSESSION OF THE (2<sup>ND</sup>) SECOND (P.C.P.)

THE (APPLICANT) WILL BE (PREJUDICE).

THE (APPLICANT) BEGS THE COURT TO GRANT THIS MOTION OF RECUSAL, OF JUDGE (L. C. MANNING) and to ALTER ANY DECISIONS HE MAY MAKE IN THIS CASE AT BAR, C.C.

COURT OF COMMON PLEAS

JUDGE L. C. MANNING (P.O. BOX 193) COLUMBIA, S. C.

Att. Gen.

Sakineh C. Klien

P.O. BOX 15549, COLUMBIA, SC 29911

Respectfully Submitted

Linda Ann Tyler  
November 2021

Sworn to and subscribe before me  
ON THIS (2) DAY OF NOVEMBER 2021  
NOTARY PUBLIC FOR THE STATE OF SOUTH CAROLINA

Calandra Y. Klien

My commission expires 11/11/24

Exhibit-D-1

STATE OF SOUTH CAROLINA	COURT OF COMMON PLEAS
COUNTY OF RICHLAND	2020-CP-40-1593
Linda Ann Tyler # 248-140	AFFIDAVIT
vs,	OF
THE STATE OF SOUTH CAROLINA	SERVICE

I, Linda Ann Tyler # 248-140, certify under penalty of perjury, that I have served Atty. Gen. Masmeen E. Klien, a photo copy of the Reply Brief in opposition to the State's motion for Conditional Dismissal of this (P.C.R.) claim.

I further contend, that notice and Reply was sent by Certified mail, with request for Return Receipt as proof of service, notice sent on the 2<sup>nd</sup> Day of November 2021.

C.C.  
Chief Administrative Judge, J.C. Manning, P.O. Box 2766, Columbia, S.C. 29202-2766

Linda Ann Tyler  
November 7<sup>th</sup> 2021

Sworn to and subscribed before me  
on this 2<sup>nd</sup> DAY OF NOVEMBER 2021

NOTARY Public FOR THE STATE OF SOUTH CAROLINA

*Cassandra Y. Kelly*

MY COMMISSION EXPIRES 1/1/24

[Redacted]

THE DEPARTMENT OF CORRECTIONS MAILROOM  
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DEPARTMENT OF CORRECTIONS

Linda Ann Tyle  
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2809 Airport  
Greenwood, S.C 29649

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Office of Atty. Gen. - C.P.C.R. Division  
Mr. Y. Green E. Klein  
P.O. Box. 11549

~~COLUMBIA S.C 29211-1549~~

10-1 MAIL

Linda Ann Tyler #248160  
LEAF Collectors Inst.  
M-4-106 (h)  
2809 Airport Road  
Greenville, S.C. 29649

GREENVILLE SC 296

8 DEC 2021 PM 2 L



Supreme Court of South Carolina  
Mr. Daniel E. Sharsense  
P.O. Box 11330  
Columbia, S.C. 29911

29211-133030



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