

THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM Horry County

Court of Common Pleas

RECEIVED

DEC 13 2021

William H. Seals Sr., Circuit Court Judge S.C. SUPREME COURT

Appellate Case No. 2021-001346

State of South Carolina

Respondent

v.

Gregory Penille # 312332

Petitioner

REASON(S) AGAINST PROHIBITION
OF FUTURE FILINGS IN THE
CIRCUIT COURT

Comes now, Gregory Penille, Petitioner Pro Se,
being duly sworn deposes the following reasons why future
filings in the circuit court may be necessary and
prohibition would be bias to the equal protection rights
of the petitioner.

As explained in Petitioner's Explanation of

Improper determination by the lower court petition
expounds;

RECEIVED

DEC 13 2021

Petitioner contends that if adverse parties
release requested documents then petitioner should have
the right to file or refile motions and/or petitions
pertaining to the then applied newly discovered
[released] evidence in this case. Had the parties
released the papers upon petitioner's previous requests
then the courts could have adjudicated the merits of
the case properly, under Rule 56 SCRPC and BPS, Inc. V.
Worthy 362 S.E. 3d 719 (2005) Dismissal must not be granted
until opposing party has had a full and fair opportunity
to complete discovery. And, Jamison V. State 410 S.C.
456 (2014), Once requested papers are justly released
to petitioner he should be allotted One (1) year from
the date of release of papers to file motion(s) / petition(s)
to the court for redress. See, Tilley V. State 334 S.C. 29
(1999), Applicant received notice, and timely filed (4th) South
Post conviction Relief action.

Therefore, Petitioner prays this court fully
adjudicate and/or waive prohibition against future filings.

December 06, 2021

day of December 2021

[Signature]
(Notary Public of South Carolina)

Commission Expires 2/17/24

(2)

[Signature]

Gregory Penille 312332
Box 02 F4A275
610 Hwy 9 west
Barnettsville, SC, 29512