

PRO SE BRIEF
FOR
APPELLATE CASE
2021-000680

2/4/2022

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SC Court of Appeals

* TO THE SOUTH CAROLINA COURT OF APPEALS *

THE APPELLANT, MICHAEL THOMAS DYER, WOULD ASK THE COURT TO PLEASE ADDRESS THE LISTED ISSUES BELOW. TO TAKE INTO CONSIDERATION WITH THIS APPEAL, FILED BY ADAM SINCLAIR RUFFIN, APPELLANT'S ATTORNEY.

1- * INDICTMENT DATES FOR ALL ELEVEN INDICTMENTS *

THE DATES THAT ARE ON THE TRUE BILLED INDICTMENTS, READ FROM JANUARY 1, 2020 TO JULY 5, 2020. IN DIRECT EXAMINATION OF MICHAEL PHIPPS, PAGES 376 THRU PAGE 379, TESTIMONY STATES THAT MICHAEL DYER WAS NOT A RESIDENT FROM JUNE 12, 2020 TO JULY 5, 2020 AT RAMBUN ROAD WERE MINOR & LIVED. CONVICTIONS SHOULD BE REVERSED AND REMANDED FOR A NEW TRIAL.

2- * DOUBLE JEOPARDY - DIRECTED VERDICT MOTION ON THE EIGHT *
COUNTS OF SEXUAL EXPLOITATION OF A MINOR - FIRST DEGREE

PAGES 393, LINE 17 THRU PAGE 397, LINE 2
TREATING THE IMAGES AS EIGHT SEPARATE OFFENSES WOULD SUBJECT MR. DYER TO DOUBLE JEOPARDY AND VIOLATE HIS RIGHT TO DUE PROCESS UNDER THE 5TH AND 14TH AMENDMENT AND CORRESPONDING SECTIONS OF THE SOUTH CAROLINA CONSTITUTION. CONVICTIONS SHOULD BE REVERSED AND REMANDED FOR A NEW TRIAL.

THANK YOU FOR YOUR TIME IN CONSIDERATION OF THESE APPEAL ISSUES.

Michael T. Dyer
MICHAEL T. DYER

APPELLANT CASE # 2021-000680

MICHAEL T. DYER, S.C. DC 385467
McCORMICK CORRECTIONAL INST.
244-B-90
336 REDEMPTION WAY
McCORMICK, S.C. 29899

APPELLATE CASE NO. 1
2021-000680

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SC Court of Appeals

V. CLAIRE ALLEN
THE SOUTH CAROLINA COURT OF APPEALS
POST OFFICE BOX 11629
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