

SOUTH CAROLINA COURT OF APPEALS RECEIVED

FEB 22 2022

GREENVILLE COURT COMMON PLEAS JUDGE HETTIA H. VERDIN #2162
JAN. 11TH 2022, DENIED RULE 60(b) RELIEF FROM JUDGMENT

IN ORDER JUDGE PERRY H. GRAVELL #2795 ORDER DISMISSAL
N/A 2-2021, C.N. 2018-CP-030-458A,
SHAHID MAJID

VS

JAN. 11TH 2022

BRYANT STURLING; COO DANIEL FILMORE; CLASSIFICATION HALVER, SOCC
NOTICE OF APPEAL,
ADA-APPELLANT HUMBLY MOVES SIC COURT OF APPEALS TO REVERSE

JUDGE HETTIA H. VERDIN #2162 ORDER, JAN. 11-2022, OF RULE 60(b)
OF, N/A 2-2021, DISMISSAL JUDGE PERRY H. GRAVELL #2795 DUE TO
BELOW, ATTACHED PRIMA FACIE FACTS.

GROUND I.

JUDGE HETTIA H. VERDIN #2162 CITED, JAN. 11-2022, ORDER "PLAINTIFF
HAS NOT POINTED TO ANY FACTS UNDER RULE 60 AS A REASON THAT HE IS
ENTITLED TO RELIEF FROM THE PREVIOUS ORDER." THIS IS FRIVOLOUS
AS BELOW PRIMA FACIE FACTS VALIDATE EXH. A, RULE 60(b) RELIEF
FROM JUDGMENT IN ORDER PRIMA FACIE DOCUMENT VALIDATES
GROUND I. RULE 60(b) CLERICAL MISTAKES ESTABLISH PRIMA FACIE
DOCUMENTS EXH. A, SOCC FORM 10-11 DEBIT E.H. COOPER ACCOUNT FORM
SHOWS ON N/A 8TH 2021, ADA-APPELLANT DID &

K/AL

II.

A/ Mail copy/ Summons and Complaint to ATTORNEY GENERAL'S OFFICE
CERTIFIED MAIL IN ACCORD Rule 4(a)(5) VIA B.R.C.I MAIL OFFICER
MS. JENNIFER WASHINGTON;

B/ Mail copy/ Summons and Complaint to SHERIFFS OFFICE, IN ACCORD
Rule 4(a)(d) VIA B.R.C.I MAIL OFFICER, MS. JENNIFER WASHINGTON;

C/ EXH. B/ COPY COVER LETTER CLERK PAUL WICKENSIMMER WITH COPY
COVER LETTERS TO ATTORNEY GENERAL OFFICE; SHERIFFS OFFICE
FOR COURT'S RECORD.

CASE CITINGS: SERVICE SUMMONS AND COMPLAINT
1/ SIC SUPREME COURT WRIT OF HABEAS CORPUS ROACHE VS. YOUNG BROTHERS
INC. OF FLORENCE NO. 8488 JUSTICE TOL

2/ SIC SUPREME COURT MATTER OF STANLEY BRUCE PALMER NO. 83011
5/18/1989,

EXH. C/ RETURN RECEIPT ATTORNEY GENERAL OFFICE SIGNATURE
DEC. 2018, JAMES ALLEN CERTIFIED COPY THAT HE DID RECEIVE COPY
SUMMONS & COMPLAINT AND DEFENDANTS DID FAIL TO ANSWER
COMPLAINT IN 30 DAYS WARRANTED Rule 12(a) VIOLATION

CASE CITINGS:
SIC COURT OF APPEALS
1/ JUSTICE HODKEM/ 4/10/13, REGIONS BANK VS. DWENS 402 SIC
840 / Appellant C/N: 2011-193506; NO. 5/113

[Handwritten signature]

III.

2/ Chief

NO. 1057

11/30/87 THOMAS VS. LLOYD 363 S.E.2d 122

11th CIRCUIT COURT OF APPEALS DEFAULT JUDGMENT
CASE LAWS

1/ DITAN VS. SHEET METAL REMODELING LLC 9/28/14 CIV: 2014 WH
4901166 / 48 F. Supp. 3d 860 / U.S. DISTRICT JUDGE

2/ ME 2 PRODUCTIONS INC. VS. ALMEND 889 F. Supp. 3d 260 / 1/29/18
2018 WH 5885 47 / W. VIRGINIA U.S. DISTRICT COURT SENIOR JUDGE
GLENN E. CONRAD

3/ LAMBORGHINI S.P.A VS. GARCIA F. Supp. 3d / 6/16/20 / 2020 WH 328
9994 / CIV: 1:18-CV-62 U.S. DISTRICT COURT JUDGE T.S. ELLIS

4/ EMPIRE FIRE MARINE INSURANCE CO. VS. RAND T. BROWN / BAR
F. Supp. 3d 684 / 7/25/18 / U.S. DISTRICT COURT CHIEF JUDGE
REBECCA BEACH - NORFOLK DIVISION

5/ HARRIS VS. BLUE RIDGE HEALTH SERVICE INC. U.S. MD. NLC
6/21/19 / 388 F. Supp. 3d 633

WHEREFORE, SIC SUPREME COURT, COURT OF APPEALS
11th CIRCUIT COURT OF APPEALS WARRANT DEFAULT JUDGMENT

THEREBY / Rule 60(d) clerical mistakes ALLUWS CORRECTION OF
JUDGMENTS IN ACCORD WITH SIC CASE LAWS COURT OF APPEALS

1/ OTTEN VS. OTTEN 889 SIC 166, 167, 889 S.E.2d 807, 808
(Ct. App. 1996)

2/ GOETHE VS. CLEVELAND 323 SIC 80, 448 S.E.2d 504, 513
(Ct. App. 1994)

CHILDED

IV.

GROUND II. Rule 60(b) newly discovered EVIDENCE.

ADA-APPELLATE DID ATTEMPT TO RESERVE SUMMONS AND COMPLAINT VIA CERTIFIED MAIL VIA RULE 21(a)(5) TO ATTORNEY GENERAL'S OFFICE, SUPERIOR'S OFFICE VIA RULE 21(a)(d) PER ORDER JUDGE PERRY/H. GRAVELY # 27 SS ORDER DN, 7/19/21; 8/9/21, WITH DEBIT FORMS, REQUEST TO STAY KISS TO MS. MAGATTE; MS. BRUNN WHOM IN CONSPIRACY RETALIATION CONSPIRED WITH APPELLEES VIOLATED SIC R.C.P. Rules 4(a)(5); Rules 4(a)(d); STATE POLICE ACCESS TO COURTS GA-01.03; 16.3; PS-10.08; 11.3 AS PRIMA FACIE DOCUMENTS Rule 60(b)(3) EXHIBITS 1-5, ADA-APPELLATE DID CITE SIC Rule 60(B) CASES AND NEWLY DISCOVERED EVIDENCE.

- 1/ TOBIAS VS. FROE N.3 386 SIC 306, 315, 688 SIC 55A, 55H (2010)
- 2/ PATTERSON VS. McNEILL ASSOCIATES INC. 312 SIC 476, 441 SIC 328, 329 N.2 (CT. App. 1994)
- 3/ BEST BELL SCALS VS. VACTRA INC 309 SIC 552, 444 SIC 560, 561 (CT. App. 1992)
- 4/ GATHING VS. BEACH PALACE, INC. 294 SIC 464, 362, SIC 736 (CT. App. 1988)

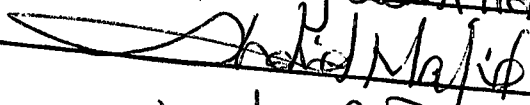
Chinita

V.

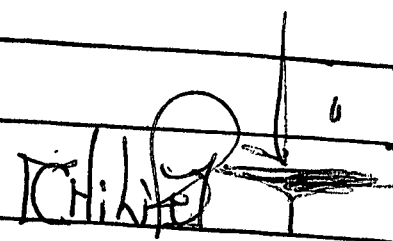
, Summary,

WHEREFORE, I Humbly ~~move~~ ^{request} THE COURT OF APPEALS
TO GRANT NOTICE OF APPEAL AND REVERSE GREENVILLE
COURT COMMON PLEAS JUDGE LETITIA H. VERON #2162
JAN. 11. 2022, ORDER AND REMAND CASE AND APPOINT
COUNSEL ON THIS DAY 17TH MONTH OF FEB. 2022

RESPECTFULLY SUBMITTED



WITNESSE MY HAND AND SEAL
ON THIS 17TH DAY OF FEBRUARY 2022



Appellants copy

SOUTH CAROLINA COURT OF APPEALS

RECEIVED

FEB 22 2022

SC Court of Appeals

GREENVILLE COURT COMMON PLEAS JUDGE ~~ETIENNE HIERON~~ #2162

#8788, JAIL # 200A, DENIES Rule 6(b)(b) RELIEF FROM

JUDGMENT OR ORDER JUDGE PERRY H. GRAVELL #8788 ORDER

DISMISSAL N/A 2-200A, CIV 2018-CP-230-4582 JAIL # 200A

SHAHID MAJID APPELLANT

VS

BRYANT STALING; COO DANIEL FILLMORE; CLASSIFICATION NUMBER, SOC APPELLEES

NOTICE OF APPEAL

DEAR CLERK MADAM JENNY ABOTT KITCHENING'S

PLEASE FILE ENCLOSED NOTICE OF APPEAL. ATTACHED EXH A, IS SWORN AFFIDAVIT OF SERVICE, WITH SEAL ATTESTING @ NOTICE OF APPEAL MADE IN GOOD FAITH; @ I'M INDIGENT CANT AFFORD PAY FILING FEE IN ACCORD WITH SC SUPREME COURT ORDER 2020. EXTRA COPY ENCLOSED TO PROVIDE CLOKED STAMPED COPY VIA Rule 2(b) TO ME ON THIS DAY OF 11TH MONTH OF FEB, 2022. EXH B, 1/11/22, ORDER.

RESPECTFULLY SUBMITTED

Shahid Majid

WITHOUT PREJUDICE 202-207-0

[Signature]

EXH. A

RECEIVED
FEB 22 2022

SC COURT OF APPEALS

AFFIDAVIT OF SERVICE

I ATTEST UNDER PENALTY OF PERJURY
§ 17-46 THAT BELOW IS TRUE.

IF THIS ATTACHED DOCUMENT IS VALID, MADE
IN GOOD FAITH, NOT TO HARM ANY ONE.

I AM INDIGENT CANT AFFORD PAYING
FEES FOR COURT AT FULL BALANCE NOW

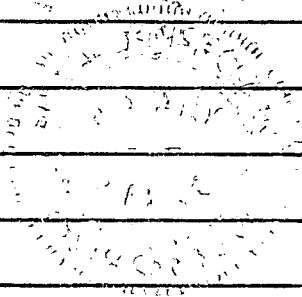
THIS IS TRUE, AND SWORN TO ME ON THIS DAY OF
1 MONTH OF
EXPIRATION DATE:

S/ Eunice Denise Clark
NOTARY PUBLIC

S/ [Signature]
WITHEWT PREJUDICE NOV 20

Sworn to and subscribed
before me this
14 day of Feb. 2022

EUNICE DENISE CLARK
Notary Public, State of South Carolina
My Commission Expires 2/5/2031



[Signature]

APPELLANT'S COPY

SOUTH CAROLINA COURT OF APPEALS

GREENVILLE COURT COMMON PLEAS JUDGE HETTIA H. VERDIN #2162

JAN. 11TH 2022, DENIED RULE 60(A)(B) RELIEF FROM JUDGMENT

OR ORDER JUDGE PERRY H. GRAVELY #2795 ORDER DISMISSAL

NOV 2-2021, C.N.: 2018-CP-030-HBBA,

SHAHID MAJID

JAN. 11TH 2022

VS

BRYANT STIRLING; COO DANIEL HILMOSE; CLASSIFICATION PALMER, SOCC
, NOTICE OF APPEAL,

ADA-APPELLANT HUMBLY MOVES SC COURT OF APPEALS TO UPTURN
JUDGE HETTIA H. VERDIN #2162 ORDER, JAN. 11-2022, OF RULE 60(A)(B)
OF, NOV 2-2021, DISMISSAL JUDGE PERRY H. GRAVELY #2795 DUE TO
BELOW, ATTACHED PRIMA FACIE FACTS.

GROUND I.

JUDGE HETTIA H. VERDIN #2162 CITED, JAN. 11-2022, ORDER "PLAINTIFF
HAS NOT POINTED TO ANY FACTOR UNDER RULE 60 AS A REASON THAT HE IS
ENTITLED TO RELIEF FROM THE PREVIOUS ORDER." THIS IS FRIVOLOUS
AS BELOW PRIMA FACIE FACTS VALIDATE EXH. A, RULE 60(A)(B) RELIEF
FROM JUDGMENT OR ORDER PRIMA FACIE DOCUMENT VALIDATES

IN GROUND I. RULE 60(b) CLERICAL MISTAKES ESTABLISH PRIMA FACIE
DOCUMENTS EXH. A, SOCC FORM 10-14 DEBIT E-HILCOOPER ACCOUNT FROM

SHOWS DN, NOV 8TH 2021, ADA-APPELLANT DID:

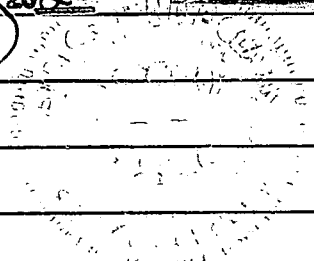
AFFIDAVIT OF SERVICE,
I A TEST UNDER PENALTY OF PERJURY
VIA § 17146 THAT ALL AND ALL DOCUMENTS
ATTACHED IS TRUE.

THIS IS TRUE AND SUBSCRIBED TO ME ON THIS
DAY OF 1 MONTH OF 1
EXPIRATION DATE:

Eunice Denise Clark & Khalid Majid
NOTARY PUBLIC WITHOUT PRE STATE WORK

Sworn to and subscribed
before me this
14 day of February 2022

EUNICE DENISE CLARK
Notary Public, State of South Carolina
My Commission Expires 2/5/2031



ICE/IN/ET

EXH. A
CLERKS COPY

LEGAL MAIL

Free SHAKID MAJID LEGAL DEFENSE FOUNDATION
HIGH LIFE NOTIAS PRESIDENT Vice President

SHAKID MAJID #199398 Kareema Majeed/Hagmail

3001 44th BROAD RIVER RD. Columbia, SC 29201

FILED-CLERK OF COURT
PAUL B. MCGEE
CLERK OF COURT
2018 DEC 6 AM 9:21

Nov. 11th 2018

Re: SHAKID MAJID vs. BRYANT STURM et al

CIV: 2018-CP-23-04388

"Rule 60(a)(b) Relief From JUDGMENT OR ORDER"

ANA Plaintiff Humbly moves chief ADMINISTRATIVE JUDGE PERRY H. GRADY #2018 TO REVERSE ORDER DISMISSAL 11/2/18 12:44pm IN ACCORD WITH BELOW, ATTACHED PRIMA FACIE DOCUMENTS, FACTS ETC.

GROUND I. Rule 60(a) clerical MISTAKES,

IN MARCH 8 2018, Rule 55 DEFAULT JUDGMENT NOTICIA PRIMA FACIE DOCUMENTS EXH. A, SDC Form 10-W DEBIT EN. Cooper Account Form SHOWS THAT ON 11/8/18, ANA Plaintiff Placed IN SDC MAIL BOX:

(1) SUMMONS AND COMPLAINT TO ATTORNEY GENERAL OFFICE CERTIFIED MAIL IN ACCORD WITH RULE 4(a)(5) COST \$14.85

(2) SUMMONS AND COMPLAINT TO SHERIFFS OFFICE IN ACCORD WITH RULE 4(a)(5)

EXH. C. LEXH. 1

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Division of Inmate Services

AGREEMENT TO DEBIT E.H. COOPER ACCOUNT

Inmate's Name: E.H. COOPER SCDC #: 11111 Housing Unit: 1111 Date: 1/1/11

GENERAL MATERIAL

** Inmate must have the funds in his/her account to pay for the materials.

Item	Amount	To be completed by SCDC staff	Cost
Envelope			
Pen			
Paper			
Postage			
Tape			
Box			
Electronic Repair			
Other			
Sub-Total:			

LEGAL MATERIAL

** Inmate is not required to have the funds in his/her account to pay for the materials; however, his/her account must be debited for all materials s/he elects to receive.

Item	Amount	To be completed by SCDC staff	Cost
Envelope			
Pen			
Paper			
Postage			
Other			
Sub-Total:			

PHOTOCOPIES

** Inmate may be required to have funds in his/her account. See SCDC Procedure (IAS-1103) OP, "Inmate Access to the Courts," to determine if inmate may receive copies without funds.

Item	Amount	To be completed by SCDC staff	Cost

EXH. B.

EXH. A

FREE STATE MEDICAL DEFENSE EDUCATION

VICE PRESIDENT

GUILD: NICHOLE: F. S. M. D. F. PRESIDENT

KAREN MUSELA / 2nd Annual

STATE MEDICAL DEFENSE #1234567890 - DR. CT. 4400 BROAD RIVER (L. COL. SC 29900)

1 NOV 15 2018

GREENVILLE SHERIFF MR. STEVE LOFTIS: 4 MCGEE STREET GREENVILLE, S.C. 29601

RE: MATJID VS. SARA DR. BRYANT P. STERLING ET AL

CN: 2018-CP-23-04588

° SERVICE & SUMMONS AND CERTIFIED COMPLAINT P/L (2/1/18)

DEAR SHERIFF STATION:

MAY THE LORD GOD OF ABRAHAM BLESS YOU FAMILY AND STAFF.

PLEASE SERVE DEFENDANTS IN ABOVE CAPTIONED CASE WITH ENCLOSED COPIES.

A COPY OF DOCUMENT IS ALSO SERVED ON U.S. ATTORNEY GEN. MR. ALAN WILSON (CERTIFIED MAIL)

BY CLERK PAUL R. WICKES SIMER

13/ DEFENDANTS

PLEASE FORWARD ME COPY SERVICE CIVIL PROCESS DIVISION REPORT SERVICE TO ME AND CLERK WICKES SIMER ME CHECK STAMPED COPY VIA R. 26 ON THIS DAY BY 5 PM, MONDAY

1 NOV 15 2018

Sincerely,

J. S. Shalickaj

with reference code 1207

cc:

ATTORNEY GEN. ALAN WILSON

CLERK PAUL R. WICKES SIMER

EXH. D. EXH. C. 1

C/N: 2018-CD-DB-04582

Rule 4(d) BLETZch vs. [unclear] Development, LP, 364 S.C. 589, 594
US S. Bd. 432, NBA(2005) - Rule 4(d) SERVICE B/ CERTIFIED MAIL

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>James M. Allen</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>																
<p>1. Article Addressed to: Attorney General Office Mr. Alan Wilson 1000 Assembly St P.O. Box 11549 Columbia SC 29211</p>	<p>B. Received by: <i>James M. Allen</i> C. Date of Delivery: <i>12/10</i></p>																
<p>9590 9402 3206 7166 9135 34</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>7017 1070 0000 8670 4453</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	

PS Form 3811, July 2015 PSN 7530-02-000-9453

Domestic Return Receipt

LEGAL MAIL ONLY

[Handwritten signature]

II.

Rule 4(b)(1), Ex. B, copy cover letters. Prima facie documents
Proof AND PLAINTIFF DID SERVE SUMMONS AND COMPLAINT
ON DEFENDANTS IN ACCORD WITH S.C. R.C.P. Rule 4(b)(5).

Rule 4(a)(d) AND S.C. CASES

1. YOUNG BROTHERS, INC. 818 S.C. 209, 456 S.E.2d 892, 900 (1995)

(When the civil rules on service are followed, there is a
presumption of proper service).

2. ESTATE OF CURLEY v. HARRING, 299 S.C. 525, 529, 386 S.E.2d 207,
266 (Ct. App. 1989) (The summons and complaint shall be served
together on each defendant).

3. MATTER OF PALMER 298 S.C. 324, 329, 380 S.E.2d 813, 815 (1989)

(A civil action is commenced by the filing & service of a summons
and complaint. The summons is to be issued by the plaintiff
or plaintiff's attorney. Respondent's failure to properly follow
the rules of civil procedure constituted incompetence which
in this case resulted in great prejudice to Mrs. client)

Ex. C, [RETURN RECEIPT] ATTORNEY GENERAL OFFICE, James M. Alton
Dec. 2018, did sign he received copy summons and complaint
to meet criteria for default judgment per S.C. Case 10/18

4. WOODSIDE DEVELOPMENT LP 364 S.C. 589, 594 615 S.E.2d 482,

489 (2005) (Further provides that this service shall not be - ~~limited~~)

III.

BASES FOR THE ENTRY OF DEFAULT UNLESS THE RECORD CONTAINS A RETURN RECEIPT SHOWING THE ACCEPTANCE OF THE DEFENDANT

THE DEFENDANTS DID FAIL TO FILE AN ANSWER IN BOARDS A SCRP R.12(a) VIOLATION IN ACCORD WITH SIC CASES AS

W/ LIMEHOUSE VS. NOISEY 392 SIC 49, 723, 812, 811 (CT App 2011)

WILLIAMS VS. VAN VOLKENBERG, 38 SIC 323, 440, 408, 409 (CT App. 1994)

(A DEFENDANT SHALL SERVE AN ANSWER IN BOARDS VIA R.12(a) AFTER SERVICE OF COMPLAINT UPON HIM (T...))

A RULE 55 DEFAULT JUDGMENT AND PLAINTIFF IS ENTITLED TO IN ACCORD WITH 4TH CIRCUIT COURT OF APPEALS C/PREHENS &

W/ ENRICH FIRE MARINE INS. CO. VS. PANDE BRAUN'S DISTRICT COURT

ED VIRGINIA, W/RECK JUDSON, 7/28/14, 300 E. SUPP. 3d 694 (Prior

ENTERING DEFAULT JUDGMENT COURT MUST ENSURE: (1) POSSESS PERSONAL

JURISDICTION OVER DEFULTING PARTY; (2) IT POSSESS SUBJECT MATTER

JURISDICTION OVER EACH OF CLAIMS; (3) ACTION IS IN PROPER VENUE

(4) DEFAULT PARTY RECEIVED PROPER SERVICE OF PROCESS JUDGMENT AGAINST

INSURED WAS WARRANTED INSURERS DECLARATORY/JUDGMENT ACTION

REGARD DUTY TO DEFEND UNDERLYING TORT)

IV.

7 PARKS CORPORATION AND CHESTER OGDINANCE CENTER, APPELLES VS.
LEXINGTON INSURANCE CO. NO. 86-1061 / 11/18/86 / 5/13/87 (ACTION RECOVER
UNDER LIABILITY POLICY INSURER MOVED FOR RELIEF FROM DEFAULT JUDGMENT)
THE US DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHESTER DENNIS B. KIRKPATRICK JUSTICE DENIED MOTION INSURER APPEALED.
THE COURT OF APPEALS (EIGHTH CIRCUIT JUDGE) HELD THAT INSURER WAS NOT
ENTITLED RELIEF FROM DEFAULT JUDGMENT, EVEN THOUGH MOTION WAS
TIMELY IF IT'S DEFENSE WOULD HAVE MENTIONED IF TIMELY ASSERTED
AS UNEXPLAINED DISAPPEARANCE OF SUMMONS / COMPLAINT FROM INSURERS
MAIL ROOM DID NOT CONSTITUTE GROUNDS FOR RELIEF UNDER ASSERTED
PORTIONS OF CIVIL RULE. AFFIRM (THOMAS W. WATSON SENIOR CIRCUIT JUDGE)
CONCURRED (MILDORF NOW ON APPEAL)

3/16/81-15/2460 (560) THE CIRCUIT AUTOMOBILE HANDBOOKS INC. SP. A VS.
GARCIA US DISTRICT E.D. VIRGINIA, 6/6/80, F. Supp. Bd. (WELL PLEADED
ALLEGATIONS OF FACT SET FORTH IN A COMPLAINT ARE DEEMED ADMITTED
AGAINST A DEFAULTING PARTY D.E.S. UNAUTHORIZED SELLER OF HANDBOOKS
MERCHANDISE FAILED DEMONSTRATE GOOD CAUSE SET ASIDE DEFAULT
AN CLAIM TRADEMARK INFRINGEMENT)

LEGAL MAIL

V.

4/ DITAN VS. STREET METAL RENOVATING L.L.C. U.S. DISTRICT COURT E.D. VIRGINIA ALEXANDRIA DIVISION 9/22/14, 48 F.Supp. 3d 860 (A DEFENDANT IN DEFAULT ADMITS FACTUAL ALLEGATIONS IN THE COMPLAINT RULE 8(b)(1) 28 U.S.C.A. - LABOR EMPLOYMENT = HIS ADVERTISES EMPLOYEE WAS ENTITLED TO \$6,001.89 OF UNPAID REGULAR (OVERTIME) WAGES UNDER THE FLSA.)

5/ HARRIS VS. BLUE RIDGE HEALTH SERV. INC. U.S. M.D. N.C. 6/21/19 / 388 F.Supp. 3d 633 (WHEN MOTION FOR DEFAULT JUDGMENT IS UNOPPOSED THE COURT MUST EXERCISE SOUND JUDICIAL DISCRETION TO DETERMINE WHETHER DEFAULT JUDGMENT SHOULD BE ENTERED RULE 55. LIFETIME DISCHARGE EMPLOYEES ESTABLISH PRIMA FACIE CASE FALSE CLAIMS ACT (FCA) RETALIATION AGAINST FORMER EMPLOYER)

RULE 60(d) CLERICAL MISTAKES ALLOWS CORRECTION OF JUDGMENTS IN ACCORD WITH SIC CASE LAUS 8

1/ OTTEN VS. OTTEN 889 S.O. 166, 162, 382 S.E.2d 202, 208 (Ct. App. 1997) (RULE 60(d) ALLOWS THE CORRECTION OF CLERICAL MISTAKES IN JUDGMENTS. A MOTION MADE UNDER THIS SECTION DOES NOT TOLL THE RUNNING OF THE TIME FOR APPEAL)

LEGAL MAIL

VI.

2/ GOETHE VS. CLEVELAND 323 S.C. 50, 448 S.E.2d 504, 505

(CT. App. 1994) (THE TRIAL COURT RETAINS JURISDICTION TO CORRECT clerical ERRORS PRIOR TO THE DOCKETING OF THE APPEAL)

GROUND II. Rule 60(b) Newly Discovered Evidence,

EXH. 1, GA. O.C.G. 16.B; EXH. 2, PS. 10.08:11.B IS PRIMA FACIE EVIDENCE SCDC Policy CITES INDIGENT INMATES ALLOWED MAIL CERTIFIED MAIL TO S/C ATTORNEY GENERAL.

EXH. 3, 1, 7/19/21 REQUEST STATE MS. MAGATTE TO MAIL SUMMONS? COMPLAINT CERTIFIED. 9/14/21 DISPOSTION @ MONTHS LATER REFUSED TO FOLLOW POLICY CITED MALICIOUSLY (ALL MUST BE PAID FOR & YOU NEED TO FILL OUT YOUR OWN CERTIFIED SLIP) EXH. 3, 2, 7/19/21 LETTER TO ATTORNEY GENERAL OFFICE WITH COPY SUMMONS? COMPLAINT IN ACCORD WITH RULE 4(d); SCDC Policy GA. O.C.G. 16.B; PS. 10.08:11.B; EXH. 3, 3, 7/29/21 LETTER STATE'S OFFICE WITH COPY SUMMONS? COMPLAINT

EXH. 4, 1, 8/9/21 PLAINTIFF DID SAME SUMMONS? COMPLAINT CERTIFIED MAIL TO ATTORNEY GENERAL OFFICE AGAIN AND [MS. MAGATTE]

[MS. BRUNSON] IN CONSPIRACY [RETRIBUTION WITH DEFENDANTS] REFUSED TO MAIL SUMMONS? COMPLAINT CERTIFIED MAIL VIOLATING MALICIOUSLY WITH SADISTIC MINDSET RULE 4(b)(5); EXH. 4, 2

Ex. 1

13. MATERIALS NOT AVAILABLE IN THE LAW LIBRARY: If the inmate requires a recently superseded policy, the inmate may send a completed RTSM (indicating exact name, title, number, etc.) to his/her Librarian/Designee who will obtain the superseded policy from the Office of Policy Development. Requests for copies must come from the Librarian and not directly from the inmate or they will be returned to the inmate without action. The Librarian/Designee will be responsible for forwarding the materials to the appropriate inmate, who will be permitted to review the superseded policy for the timeframe allowed by their institution. **NOTE:** A recently superseded policy is defined as a policy that has been superseded within six (6) months. Exceptions to this may be considered for grievances and/or law suits.

14. TELEPHONE CALLS TO ATTORNEYS:

- General population inmates may contact their attorney/representative during times when they are permitted telephone use.
- See SCDC Policy "OP-22.38, "Restrictive Housing Unit," for information on attorney/representative telephone calls for *SSR* inmates.
- See SCDC Policy OP-22.16, "Death Row," for information on attorney/representative telephone calls for Death Row Inmates.
- See SCDC Policy OP-22.38, "Restrictive Housing Unit," for information on attorney/representative calls for *RHU* inmates. (4-ACRS-6A-01, 4-4275)

14.1 All telephone calls will be monitored unless the inmate's attorney requests that his/her calls not be monitored. This may be accomplished using the procedures outlined in SCDC Policy ADM-15.02, "Telephone Use."

15. ATTORNEY VISITS: Inmates will be permitted to visit with their attorney in accordance with SCDC Policies OP-22.09, "Inmate Visitation," OP-22.38, "Restrictive Housing Unit," OP-22.16, "Death Row," and/or SCDC policies regarding controlled movement.

16. CORRESPONDENCE:

16.1 Subject to the requirements of SCDC Policy PS-10.08, "Inmate Correspondence Privileges," an inmate will be permitted to send an unlimited amount of legal mail regardless of his/her indigent status, E. H. Cooper Trust Account current cash balance, or canteen spending limit. **NOTE:** For indigent inmates, all pending/initiated legal actions in court must relate to challenging or appealing the inmate's sentence or to challenging the conditions of his/her confinement. However, the inmate's Cooper Account will be debited to cover the cost of all legal correspondence, including postage, paper, envelopes, and any other necessary supplies or fees. The only exception will be that an inmate must be permitted to use the general mail supplies provided to him/her as indicated in SCDC Policy PS-10.08, "Inmate Correspondence *Privileges*," for the purposes of mailing legal correspondence. **NOTE:** Inmates without canteen privileges and inmates housed in any *RHU*, the *SSR*, or Safekeeper Unit will request to have their accounts debited for these supplies using SCDC Form 10-14, "Agreement to Debit E.H. Cooper Account."

16.2 An indigent inmate or an inmate without funds in his/her E.H. Cooper Trust Fund account who wishes to send legal mail outside the state of South Carolina must show the Postal Director/Mailroom Supervisor or designee that: s/he is a party of an action in another state; or the attorney to whom s/he intends to send mail is licensed to practice law in South Carolina. (4-ACRS-6A-01, 4-4275)

16.3 Certified Legal Mail: Inmates will be permitted to send certified legal mail for summons or complaints to the Attorney General in compliance with the S.C. State Court Rules. Inmates will be required to pay for certified legal mail and their accounts will be debited. Indigent inmates will be permitted to send certified legal mail only to the S. C. Attorney General; however, their accounts will be debited using SCDC Form 10-14.

17. FILING FEES: Inmates will be required to pay filing fees pursuant to all applicable S.C. State Court Rules and Federal Court Rules.

18. NOTARY SERVICES: Inmates will have access to notary services at their institution in keeping with institutional schedules and security measures. The notary shall verify that the individual appearing before him/her is the individual actually named as the person being sworn in the document to be executed. The notary shall ask the individual the following oath, "Do you solemnly swear or affirm that the statements contained in this document are true and correct to the best of your knowledge and belief?" If the individual refuses to swear or affirm or answers the question in the negative, the notary shall not notarize the document and will complete an SCDC Form 19-29, "Incident Report," documenting the individual's response.

The following items are inmate documents that do require notarization:

- PCR (Post Conviction Relief) applications;
- Applications to proceed in court without payment of costs;
- Powers of Attorney;
- Wills;

Exhibit

11.1.1 The inmate's Cooper Trust Fund will be debited to cover the cost of all legal correspondence, to include envelopes, postage, writing instruments, and any other necessary supplies. Inmates without canteen privileges and inmates housed in any *RHU/SSR*, or Safekeeper Unit will have their accounts debited for these supplies using SCDC Form 10-14, "Agreement to Debit E.H. Cooper Account." The Chief, Commissary Branch/designee, will provide a price list for envelopes, writing instruments, paper, and any other necessary mailing supplies to the Agency's Mailroom Coordinator, who will ensure that the list is provided to all institutional mailrooms. The list will be updated when prices change. The institutional mailroom staff will use this list to calculate restitution amount

11.2 Privileged: An inmate will be authorized to send unlimited amounts of privileged correspondence provided s/he has the funds to pay for the same. An indigent inmate will be permitted to use the general mail supplies provided to him/her as indicated in Section 4.2.1, above, for the purposes of mailing privileged correspondence. *General population inmates may use the Automated Request to Staff System, or inmates housed in restrictive housing areas may utilize SCDC Form 19-11, "Request to Staff Member," to send correspondence to the mailroom staff at his/her current institution. The correspondence will be forwarded to the appropriate area(s) if needed. (4-4280)*

*11.2.1 Inmates incarcerated in an SCDC facility may report any act of sexual abuse by calling *22, and/or by written or verbal reports to any Agency staff member, contract employee, volunteer, or the Division of Police Services or SLED (address). The inmate can file a written report without giving his/her name or the name of the abuser(s). This information could also include an assault that occurred at any correctional facility, detention center, county facility or while under community supervision, prior to or during his/her commitment to SCDC (4-4281-7).*

11.3 Certified: An inmate will be permitted to send certified mail provided s/he has the funds in his/her account to pay for the same. Pursuant to South Carolina Court Rules, indigent inmates and inmates without funds in their account will only be authorized to send certified mail for summons or complaints going directly to the S. C. Attorney General's Office. If there is a problem with the delivery of certified mail, the inmate will submit a SCDC Form 19-11, Request to Staff Member," if housed in a restrictive area or via kiosk for inmates in general population, to the mailroom asking for assistance. The SCDC Form 19-11 must contain all pertinent information. (4-ACRS-6A-02, 4-4274)

12. INMATE CHECK:

12.1 An inmate wishing to send money through the mail must have a check written on his/her E.H. Cooper Trust Fund account. (See SCDC Policy ADM-15.12, "E.H. Cooper Trust Fund.")

12.2 The Division Director, Director of Finance, or designee will mail the check to the payee.

12.3 The Postal Director/Mailroom Supervisor or designee will be responsible for providing inmates housed in any *RHU/SSR*, Death Row, and Safekeeper Unit access to the E. H. Cooper Trust Fund in accordance with specific procedures related to the same.

13. OUTGOING PACKAGES: An inmate will be prohibited from sending packages unless it contains one of the following:

13.1 Finished hobbycraft items, or hobbycraft supplies, and materials as stipulated under SCDC Policy PS-10.06, "Inmate Hobbycraft Program."

13.2 Excess authorized property items pursuant to the requirements of SCDC Policy OP-22.03, "Authorized Inmate Property and Disposition of Unauthorized Property."

13.3 Personal electronic appliances (e.g., Walkman, typewriters, etc.) authorized for possession under SCDC Policy OP-22.03, "Authorized Inmate Property and Disposition of Unauthorized Property," requiring service or repairs costing up to \$100 may be sent to a dealer or repair/service center authorized by the SCDC. Grandfathered items (boom boxes, and radios) or the new televisions may not be sent out for repair. Inmates will

EXH. B. 2,

FREE SHAHID MAJID LEGAL DEFENSE FOUNDATION
HIGHLIGHT MOTIONS PRESIDENT VICE PRESIDENT
SHAHID MAJID #19988 KHARBEEMA NUSCHE #218001
DPT- CONGAREE #147- 2460 BROAD RIVER Rd.
Col. SC 29201

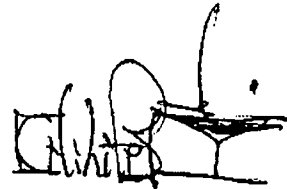
JULY 16 - 2021

RE: SHAHID MAJID VS. PLAINT STUTTING
C/N: 2018-CP-DB-0458A
SERVICE SUMMONS COMPLAINT

DEAR ATTORNEY GENERAL

SIR, PLEASE FIND ENCLOSED SUMMONS
AND COMPLAINT ON THIS DAY OF 19, MONTH
OF JULY, 2021

Sincerely,
Shahid Majid
with love and devotion



EXH. 3, 3, 1

FREE SHAHID MAJID LEGAL DEFENSE FOUNDATION
HIGH LIFE MOTIONS PRESIDENT VICE PRESIDENT
Shahid MAJID #199 1398 Kareem M. Odeh / 24@gmail.com
BRCT CONSPICE #147-4460 B ROAD RIVER Rd.
Cd. Sic 00201

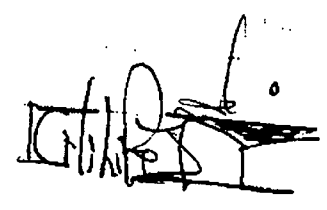
1 JULY 16, 2021

RE: SHAHID MAJID VS. BRYANT STIRLING
DN: 2018-CP-03-04582
VERIFIED COMPLAINT T SUMMONS SERVICE

DEAR SHERIFF LEON LOTT JR;
PLEASE SERVE SCDC DIRECTOR BRYANT STIRLING
AND SCDC. I HAVE COURT ORDER I HAVE TO
PRESERVE THEM. MAY GOD BLESS YOUR GOOD
DEEDS & INTENTIONS IN THIS DAY OF 19, MONTH
JULY, 2021

Sincerely

Shahid Majid
WITHOUT PREJUDICE (2021)

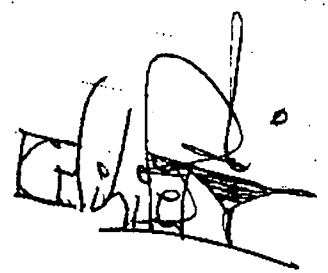


SHAHID MAJID
FREDERICK MAJID LEGAL DEFENSE FOUNDATION
HIGHLIFE NOTUS PRESIDENT VICE PRESIDENT
SHAHID MAJID #199888 KAREEMA MUSLEH
BRCF CONGRESS #1117- NN60 BRAD RIVER
CAL 512 39201

1 AUG. 6-2021
RE: SHAHID MAJID VS. BRANT STIRLING ETAL
CIV. 2018-CP-030-NY88
SUMMONS VERIFIED COMPLAINT

DEAR ATTORNEY GENERAL;
PLEASE FIND ENCLOSED SUMMONS &
VERIFIED COMPLAINT ON THIS DAY OF 9, MONTH
OF AUG, 2021

SINCERELY
SHAHID MAJID
WITHOUT PRECEDENT 2021



VII.

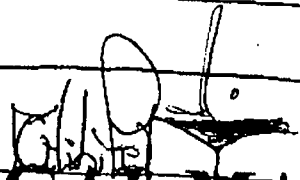
SCDC Polite GA. 01.08:16.B; PS. 10.08:11.B

Exh. 9, Kiosk to SCDC answered by Ms. Magatte; Ms. Brunson
(CO 66022) on 9/20/21; 9/21/21 cited Don't Kill Out
Certified slips to mail certified mail. Maliciously, with sadistic
Minded Rule 60(B); GA. 01.08:16.B; PS. 10.08:11.B.

With attached Primafacie newly discovered evidence
ADA Plaintiff is entitled to Rule 60(B) relief from judgment
or order in accord with below meritorious cases &
W. Tobias vs. Rice N.B. 386 S.C. 306, 310, 1988 S.E.2d 552, 554 (2010)

Rule 60(B) SCDC requires a particularized showing of mistake
in a sentence excusable neglect, surprise, newly discovered
evidence, fraud, misrepresentation or other misconduct of an
adverse party)

W. Patterson vs. McNeill Associates, Inc. 312 S.C. 441, 441, S.E.2d 308
309 N.D. (Ct. App. 1994). Best Bell Seals vs. Valtra Inc. 309 S.C. 552
441 S.E.2d 560, 561 (Ct. App. 1994); Gattling vs. Beach Palace,
Inc. 224 S.C. 464, 365, S.E.2d 236 (Ct. App. 1988) (Rule 60(B) SCDC
requires a showing of one of 6 enumerated reasons before
the court may grant relief from a judgment.)


T. F. CAT, MATH

EXH. 5, STOCK KIOSK,

11. 9/18/21 8:49 AM (CO66022)
(WE DO NOT FILL OUT CERTIFIED SLIPS FOR
YOU MUST HAVE IT ATTACHED WITH YOUR
MAIL) REPLY TO:
9/18/21 11:54 AM KIOSK

21. 9/21/21 8:51 AM (CO66022)
(ONCE AGAIN IF YOU WANT MAIL TO BE CERTIFIED
YOU NEED TO HAVE THE SLIPS ATTACHED TO
YOUR MAIL. HAVE A GREAT DAY.)
REPLY TO:
9/20/21



VII.

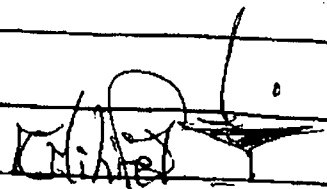
SUMMARY,

Wherefore, I Humbly Move COURT GRANTING Rule 60
Relief From JUDGMENT OR ORDER, 11/18/21, AND CASE Placed
Back ON DOCKET POSTER ON THIS DAY 11TH MONTH OF
1 NOV, 2021

RESPECTFULLY SUBMITTED

Shahid Majid

Without Prejudice (WOP)



LEGAL MAIL

II.

A) Mail copy summons and complaint to ATTORNEY GENERAL'S OFFICE
CERTIFIED MAIL IN ACCORD RULE 4 (a) (5) VIA B.R.C.I MAIL OFFICER
MS. JENNIFER WASHINGTON;

B) Mail copy summons and complaint to SHERIFFS OFFICE IN ACCORD
RULE 4 (a) (d) VIA B.R.C.I MAIL OFFICER, MS. JENNIFER WASHINGTON,
C.I. EXM. BY COPY COVER LETTER CLERK PAUL WICKENSIMER WITH COPY
COVER LETTERS TO ATTORNEY GENERAL OFFICE; SHERIFFS OFFICE

FOR COURT'S RECORD,

CASE CITINGS: SERVICE SUMMONS AND COMPLAINT

1) S.C. SUPREME COURT WRIT OF CERTIORARI ROCKE VS. YOUNG BROTHERS
INC. OF FLORENCE NO. 84888 JUSTICE TOL

2) S.C. SUPREME COURT MATTER OF STANLEY BRUCE PALMER NO. 83011
5/18/1989,

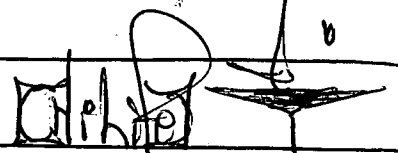
EXH. C, (RETURN RECEIPT) ATTORNEY GENERAL OFFICE SIGNATURE

DEC. 2018, JAMES ALLEN CERTIFIED COPY THAT HE DID RECEIVE COPY
SUMMONS & COMPLAINT AND DEFENDANTS DID FAIL TO ANSWER
COMPLAINT IN 30 DAYS WARRANTED RULE 12 (b) VIOLATION

CASE CITINGS:

SIC COURT OF APPEALS

1) JUSTICE LOCKERY, 4/10/13, REGIONS BANK VS DWENS HORRIG
840 / Appellant C/N, 2011-193586; NO. 5113



III.

2/ Chief
NO. 1057 11/30/87 THOMAS VS. H/O/D 363 S.E. 2d 122

11th CIRCUIT COURT OF APPEALS DEFAULT JUDGMENT
CASE LAWS

1/ DUTAN VS. SHEET METAL REMODELING LLC 9/28/14, CN: 2014 WL
4701166 / 48 F. Supp. 3d 860 / U.S. DISTRICT JUDGE JAMES C. GACHHEAD

2/ ME 2 PRODUCTIONS INC. VS. ALMED 889 F. Supp. 3d 260 11/29/18
2018 WL 5855 47 / W/O VIRGINIA U.S. DISTRICT COURT SENIOR JUDGE
GLENN E. CONRAD

3/ LAMBURGHINI S.P.A VS. GARCIA F. Supp. 3d / 6/16/20 / 2020 WL 325
9794 / CN: 1:18-cv-60 U.S. DISTRICT COURT JUDGE T.S. PULLIS

4/ EMPIRE FIRE & MARINE INSURANCE CO. VS. RAND T. BROWN / 322
F. Supp. 3d 684 / 7/25/18 / U.S. DISTRICT COURT CHIEF JUDGE
REBECCA BEACH NORFOLK DIVISION

5/ HARRIS VS. BLUE RIDGE HEALTH SERVICE INC. U.S. MD. N/C
6/21/19 / 388 F. Supp. 3d 633

WHEREFORE, SIC SUPREME COURT, COURT OF APPEALS,
11th CIRCUIT COURT OF APPEALS WARRANT DEFAULT JUDGMENT
THEREBY (Rule 60d) CLERICAL MISTAKES ALLOWS CORRECTION OF
JUDGMENTS IN ACCORD WITH SIC CASE LAWS COURT OF APPEALS

1/ OTTEN VS. OTTEN 887 SIC 166, 160, 387 S.E. 2d 807, 808
(Ct. App. 1996)

2/ GOETHE VS. CLEVELAND 323 SIC 80, 448 S.E. 2d 504, 525
(Ct. App. 1994)

CHILDS

N.

GROUND II. Rule 60(b) newly discovered EVIDENCE

ADA-APPELLANT DID ATTEMPT TO RESERVE SUMMONS AND COMPLAINT VIA CERTIFIED MAIL VIA RULE 4(a)(5) TO ATTORNEY GENERAL'S OFFICE, SUPERIOR'S OFFICE VIA RULE 4(a)(6) PER ORDER JUDGE PERRY H. GRAVELL # 2755 ORDER DN, 7/9/21, 8/9/21, WITH DEBIT FORMS, REQUEST TO STAFF KIOSK TO MS. MAGATTE, MS. BRUNSWER WHOM IN CONSPIRACY RETALIATION CONSPIRED WITH APPELLEES VIOLATED S.C.R.C.P. RULES 4(a)(5); RULES 4(a)(6); SCDC POLICY ACCESS TO COURTS GA-01.03: 16.3; PS-10.08: 11.3 AS PRIMA FACIE DOCUMENTS RULE 60(b)(3) EXHIBITS 1-5, ADA-APPELLATE DID CITE S.C. RULE 60(b) CASES AND NEWLY DISCOVERED EVIDENCE

1/ TOWNS VS. BICE N.3 386 S.C. 306, 315, 688 S.E.2d 552, 554 (2010)

2/ PATTERSON VS. MCNEILL ASSOCIATES INC. 312 S.C. 471, 441 S.E.2d 328, 329 N.2 (Ct. App. 1994)

3/ BESTO BELL SCALS VS. VACTRA INC. 309 S.C. 550, 404 S.E.2d 560, 561 (Ct. App. 1990)

4/ GATHING VS. BEACH PALACE, INC. 294 S.C. 464, 365 S.E.2d 736 (Ct. App. 1988)

IC/1/1/21

V.

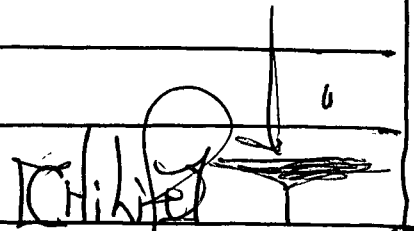
Summary,

WHEREFORE, I Humbly move SIC COURT OF APPEALS
TO GRANT NOTICE OF APPEAL AND REVERSE GREENVILLE
COURT COMMON PLEAS JUDGE LETITIA H. VERDIN #2162
JAN. 11. 2022, ORDER AND REMAND CASE AND APPOINT
COUNSEL ON THIS DAY AT 14TH MONTH OF FEB, 2022

RESPECTFULLY SUBMITTED



WITNESSE MY HAND AND SEAL



EXH A

AFFIDAVIT OF SERVICE,

I ATTEST UNDER PENALTY OF PERJURY VIOL 17-246
THAT BELOW IS TRUE.

W/ THIS ATTACHED DOCUMENT IS VALID, MADE
IN GOOD FAITH, NOT TO HARM ANYONE.

2/ I AM INDIGENT CANT AFFORD PPL FILING
FEES FOR COURT.

THIS IS TRUE AND SWORN TO ME ON THIS DAY
OF _____, MONTH OF _____, _____
EXPIRATION DATE: _____

S/ Eunice Denise Clark
NOTARY PUBLIC

S/ ~~Michael~~ [Signature]
W/ [Signature]

Sworn to and subscribed
before me this
14 day of February 2022

EUNICE DENISE CLARK
Notary Public, State of South Carolina
My Commission Expires 2/5/2031

RECEIVED

FEB 22 2022

SC Court of Appeals

[Signature]

CLERKS COPY

SOUTH CAROLINA COURT OF APPEALS

GREENVILLE COURT COMMON PLEAS JUDGE LETITIA H. VERNON #2100

JAN. 11-2022 DENIED RULE 60(b) RELIEF FROM JUDGMENT
ORDER JUDGE PERRY H. GAUGHY #0755 ORDER DISMISSAL

MAR. 2-2021, CIV: 2018-CP-230-4982

SHAHINA MAJID APPELLANT

RECEIVED JAN 11 2022

VS.

FEB 22 2022

SC Court of Appeals

BRYANT STIRLING; DOORANIEL FILMORE; CLASSIFICATION LAWYER, SCOR
APPELLEES

NOTICE OF APPEAL

DEAR CLERK MADAM JENNY ABOU-KHACHING,

PLEASE FILE ENCLOSED NOTICE OF APPEAL. ATTACHED

EXH A, IS SWORN AFFIDAVIT OF SERVICE WITH SEAL ATTESTING

① NOTICE OF APPEAL MADE IN GOOD FAITH; ② I'M INDIGENT

CANT AFFORD PAY FILING FEE IN ACCORD WITH SC SUPREME COURT

ORDER 2020. EXTRA COPY ENCLOSED TO PROVIDE CLOCKED

STAMPED COPY VIA RULE 2(a) TO ME ON THIS DAY OF 11TH


MONTH OF FEB, 2022, EXH B, 1/11/22 ORDER.

RESPECTFULLY SUBMITTED

Shahina Majid

WITHOUT PREJUDICE (02/22)

Tree Shalona TID LEGAL DEFENSE FUNDATION
HIGHLIFE NOTAS PRESIDENT Shalona NATID #199398
KID T-H BMU #124 #314 BROADENER Rd. Columbia, SC 29201
VICE PRESIDENT Barbara MISCLE #14 agmail

US POSTAGE PAID BY ADDRESSEE

ZIP 29210 \$ 002.16⁰
02 4W
0000378357 FEB 15 2022

RECEIVED
FEB 22 2022
SC Court of Appeals

SCDC
FEB 15 2022
MAIL ROOM

South Carolina Court of Appeals
CLERK OF COURT MARIANNE W. ABSTITCHINGS
POST OFFICE BOX 11609
Columbia, SC 29211

LEGAL
MAIL
ONLY