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MAR 06 2022 SUPREME COURT ("S Ct") OF SOUTH CAROLINA ("SC")

Appellate Case No. 2022-000145

S.C. SUPREME COURT
AND STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE CIRCUIT COURT OF COMMON PLEAS
On Application for Post-Conviction Relief No. 2019-CP-40-00112

Marie Assa'ad-Faltas, MD, MPH, Appellant
v.
State of South Carolina, and City of Columbia,
SC, Respondents.

Applicant/Appellant's RENEWED and UPDATED **MOTIONS** for
(1) Leave to File and Serve in all her cases in SC Appellate
Courts per Amended Rule 262 (a)(3) and (c)(3), SCACR;
(2) Restoration of all her SC Appellate Cases to C-Track; and
(3) Correction of the 25 February 2022 ORDER in 2021-000815.

Without notice to, or consultation with, Applicant/Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") *pro se*, her 7 March 2022 "**MOTIONS for (1) Leave to File by email in SC Appellate Courts; and (2) Correction of Attached Transcript and Order**" in this case, was removed from this case's C-Track, surely **because it made freely accessible to the public** this *stunning* admission by SC Associate Justice Few in the 22 February 2022 *Faretta* hearing of SC Appellate Case 2021-000815 at Tr. p 15, lines 13-17:

In fact, you have already raised constitutional issues and you've done it here today. And I just want to make sure you understand that there are many times when even the judges on this Court don't understand the constitutional issues[,]

SC Associate Justice Few added at p 18, lines 8-13, of same hearing's transcript:

Q: [...] I will remind you, as I'm sure you know, that it is our duty to do what you just said. It's actually part of the oath that we all take as judges to listen fairly to every person who comes in here to raise a position.

And Acting SC Chief Justice Kittredge concluded at *id.* p 21, lines 9-15 [with emphasis added]:

JUSTICE KITTREDGE: I will on behalf of the entire Court echo what Justice Few said about our duty to treat all litigants, represented and unrepresented fairly, equally, and in accordance with the law, both procedurally and substantively.

Justice cannot be rationed; nor may Dr. Assa'ad-Faltas be now punished for having attributed some sincerity to SC Associate Justices Few and Kittredge. Or were promises of equal treatment **meant solely for the darkness of SC S Ct's courtroom without remote public access?**

Were grand promises of equality and fairness spoken *only* to lure Dr. Assa'ad-Faltas into *pro se* advocacy and entrap her in *direct* contempt if and when, God willing, she raises valid defenses to *indirect* contempt?

Justice Few is proud of his article, *The Courage of a Lawyer: Removing Dr. Assa'ad-Faltas' submission from C-Track, solely because it made public what was spoken in the dark, is the opposite of courage.*

She *meant* her 7 March 2022 motion *for this case* and *this motion is for this case* **because she needs to file and serve per Amended Rule 262 (a)(3) and (c)(3), SCACR, in this case and all her SC Appellate cases.**

Dr. Assa'ad-Faltas simply cited as authority the promises made to her in the course of SC Appellate Case 2021-000815, the existence of which this Court *still* refuses to admit *in public* just as the CIA refuses to admit *in public* the existence of "dark sites" for "enhanced interrogation." *U.S. v. Husayn*, 595 U.S. __ (3/3/2022).

WHEREFORE, this motion should be *publicly* filed and granted *consistently with promises made in the dark.*

Certificate of Submission AND Certificate of Service AND of Copies

Submitted by hand-delivery to an agent of this Court and served by hand-delivery and e-mail to Ms. Meadows, Mr. Smith, and Mr. Zelenka, with copies by e-mail to the Clerk of Richland County's Circuit Court Clerk, and Ms. Saxon at jsaxon@sccid.sc.gov, Mr. Griffith at tgriffith@tgriffith.com, and Mr. Dudek at rdudek@sccid.sc.gov, all on 16 March 2022, and all God so willing.

[s/] Marie Assa'ad-Faltas, MD, MPH, Applicant/Appellant *pro se*

P.O. Box 9115, Columbia, SC 29290

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MAR 16 2022

BEFORE THE SUPREME COURT (S.Ct.) OF SOUTH CAROLINA ("SC")

Appellate Case No. 2022-000145

S.C. SUPREME COURT

AND STATE OF SOUTH CAROLINA IN THE CIRCUIT COURT OF COMMON PLEAS
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Applicant/Appellant's **RENEWED** and **UPDATED MOTIONS** for
(1) Leave to File and Serve in all her cases in SC Appellate
Courts per Amended Rule 262 (a)(3) and (c)(3), SCACR;
(2) Restoration of all her SC Appellate Cases to C-Track; and
(3) Correction of the 25 February 2022 ORDER in 2021-000815.

Applicant/Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") *pro se* shows that, after this *stunning* admission by SC Associate Justice Few in the 22 February 2022 *Faretta* hearing at (attached) corrected Tr. p 15, lines 13-17:

In fact, you have already raised constitutional issues and you've done it here today. And I just want to make sure you understand that there are many times when even the judges on this Court don't understand the constitutional issues[.]

SC Associate Justice Few added at p 18, lines 8-13, of same hearing's transcript:

Q: [...] I will remind you, as I'm sure you know, that it is our duty to do what you just said. It's actually part of the oath that we all take as judges to listen fairly to every person who comes in here to raise a position.

And Acting SC Chief Justice Kittredge concluded at *id.* p 21, lines 9-15 [with emphasis added]:

JUSTICE KITTREDGE: I will on behalf of the entire Court echo what Justice Few said about our duty to treat all litigants, represented and unrepresented fairly, equally, and in accordance with the law, both procedurally and substantively.

In that spirit on 7 March 2022, Dr. Assa'ad-Faltas filed and served by *hand-delivery* her motion for leave to file with SC's appellate courts according to this Court's 2021-08-25-02 ORDER as she needs to do so and must not be denied what is accorded *as of right* to all similarly-situated others. SC S Ct's *administrative* rules *ostensibly* aim "to secure the just, speedy, and inexpensive determination of every action." SCRCPC 1. Filing by email is speedier and cheaper than paper filing; the *appearance* of justice requires the same *procedure* for all; and the *essence* of justice forbids punishment without (or before) proof of guilt.

After appearing on C-Track, that motion *inexplicably* disappeared from it as had Dr. Assa'ad-Faltas' appeals 2021-000047, 48 and 49. Another of her appeals, 2019-000036 never appeared on C-Track. And the current 2021-000815 is not on C-Track, thus effecting wholesale denial of Dr. Assa'ad-Faltas' right to public criminal trial *at all its stages*. All these matters are obviously and beyond doubt inter-related. The now-disappeared 7 March 2022 motion had also sought to have the (re-attached) 25 February 2022 ORDER in SC Appellate Case 2021-000815 corrected/amended by replacing "Petitioner" with "Respondent" in the fifth line of the first paragraph and "Petitioner's" with "Respondent's" in the third line of the last paragraph. These corrections are again hereby sought as said typos would confuse strangers to the law in general and/or to that case in particular.

Certificate of Submission AND Certificate of Service AND of Copies

Submitted by hand-delivery to an agent of this Court and served by e-mail to Mr. James at marshall.james@columbiasc.gov, to Ms. Rushing at amye.rushing@columbiasc.gov, to Ms. Saxon at jsaxon@sccid.sc.gov, to Timothy Griffith at tgriffith@tgriffith.com, and to Robert Dudek at rdudek@sccid.sc.gov, and by hand-delivery and e-mail to Ms. Meadows, Mr. Smith and Mr. Zelenka, all with a copy to the Clerk of Richland County's Circuit Court Clerk, all on 14 March 2022, and all God so willing.

[s/] Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant *pro se*
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