

Original

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

Appellate Case No. 2022-000145

AND STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE CIRCUIT COURT OF COMMON PLEAS

On Application for Post-Conviction Relief (PCR) No. 2019-CP-40-00112

Marie Assa'ad-Faltas, MD, MPH, Appellant

Applicant/Appellant's: (1) AMENDED Certificate  
of Service; and (2) Provision of apparently  
Inadvertently-omitted exhibit.

v.

State of South Carolina, and City of Columbia, SC, Respondents.

On 18 April 2022, Dr. Assa'ad-Faltas hand-delivered to this Court a document captioned for this case with a certificate of submission and certificate of service and of copies, reading:

Sincerely submitted **and served by hand-delivery** to SC Attorney General's ("SCAG") office at 1000 Assembly Street Columbia, SC 29201, also served on Ms. Snelling by hand-delivery to the Office of Commission Counsel at 1220 Senate Street, Columbia SC 29201, and copied to: Professors Erica Hashimoto at eh502@georgetown.edu, Daniel Ortiz at dro@virginia.edu, and Sean Andrussier at andrussier@law.duke.edu, and Tim Griffith at tgriffith@tgriffith.com, Jessica Saxon at jsaxon@sccid.sc.gov, Robert Dudek at rdudek@sccid.sc.gov, and relevant others on 18 April 2022, all God so willing.

The reference to Ms. Snelling was an error due to the transposition of the certificate of service from another case; and no service in this case was, or should be, made on Ms. Snelling. Otherwise, hand-delivery to SCAG's office failed due to closure of the public doors to the building. Dr. Assa'ad-Faltas then phoned Mr. Zelenka, hoping he would step outside the building's entrance and there receive the documents meant for service on him in the other case and on Ms. Meadows in this case; but no answer was received. The documents were courtesy-served on Mr. Zelenka and Ms. Meadows and Mr. Smith, inter alia, by email few hours later.

Early on 19 April 2022, Dr. Assa'ad-Faltas spoke by phone to Mr. Zelenka, who suggested service by mail after Dr. Assa'ad-Faltas explained that her 28-year-old car needs emergency repair before she can feel safe driving it again. Mailing requires driving to the USPO; and Dr. Assa'ad-Faltas stills sees no legitimate purpose in the bar against her filing and serving by email in the cases where she is allowed to proceed pro se; but, in compliance with her duty of candor to the tribunal, she hereby amends the certificates of service by indicating that the above-identified document is, on 19 April 2022, God willing, served by postage-prepaid first-class U.S. mail properly addressed to SC Attorney General's ("SCAG") office at 1000 Assembly Street Columbia, SC 29201, with notation of attention to Mr. Zelenka as he allowed Dr. Assa'ad-Faltas to also include in the same envelope all the documents that were meant to be hand-served on 18 April 2022 in both this case and SC Appellate Case 2021-000815.

An exhibit of which copies were returned stamped "received" does not appear on C-Track. In case it was not included in the Court's originals, another original is attached hereto.

**Certificate of Submission AND Certificate of Service AND of Copies**

Sincerely submitted **and served by postage-prepaid first-class U.S. mail properly addressed** to SC Attorney General's ("SCAG") office at 1000 Assembly Street Columbia, SC 29201, and courtesy-copied to: Tim Griffith at tgriffith@tgriffith.com, Jessica Saxon at jsaxon@sccid.sc.gov, Robert Dudek at rdudek@sccid.sc.gov, and relevant others on 19 April 2022, all God so willing.

RECEIVED

APR 22 2022

S.C. SUPREME COURT

S/Marie-Thérèse Assa'ad-Faltas, MD, MPH, Applicant/Appellant pro se  
P.O. Box 9115, Columbia, SC 29290 e-mail: Marie\_Faltas@hotmail.com  
Phone: (803) 783-4536 Cell: (330) 232-4164

**FW: Sept. 13 Faltas matter continued due to lack of Court Reporter/Court Monitor**

Timothy L. Griffith &lt;tlgriffith@tlgriffith.com&gt;

Tue 2021-09-07 12:19 PM

To: Marie Faltas &lt;Marie\_Faltas@hotmail.com&gt;; 'Marie Assa'ad-Faltas' &lt;marieassaadfaltas@gmail.com&gt;

**RECEIVED**  
**APR 22 2022**  
**S.C. SUPREME COURT**

Timothy L. Griffith, Esquire  
 Attorney at Law  
 803 499-2012

**From:** Brown, Craig [mailto:cbrownj@sccourts.org]**Sent:** Tuesday, September 7, 2021 10:21 AM**To:** Timothy L. Griffith <tlgriffith@tlgriffith.com>; 'Yasmeen Klein' <YasmeenKlein@scag.gov>; Brown, Craig Law Clerk (Mikell Scarborough) <cbrownlc@sccourts.org>; 'Dan Addison' <DAddison@hallboothsmith.com>; 'James, Marshall S' <Marshall.James@columbiasc.gov>**Cc:** Brown, Craig Secretary (Stacey R. Minton) <cbrownscc@sccourts.org>**Subject:** RE: Sept. 13 Faltas matter continued due to lack of Court Reporter/Court Monitor

Good morning. I hope you all are well. In light of the scheduling difficulties and issues pertaining to shortage of court reporters, I have requested that court administration give me a week in Richland County sometime during the first six months of next year when our schedules come out. Those schedules should be coming out sometime this month.

Craig

**From:** Timothy L. Griffith [mailto:tlgriffith@tlgriffith.com]**Sent:** Thursday, August 26, 2021 10:16 AM**To:** 'Yasmeen Klein' <YasmeenKlein@scag.gov>; Brown, Craig Law Clerk (Mikell Scarborough) <cbrownlc@sccourts.org>; 'Dan Addison' <DAddison@hallboothsmith.com>; 'James, Marshall S' <Marshall.James@columbiasc.gov>**Cc:** Brown, Craig <cbrownj@sccourts.org>; Brown, Craig Secretary (Stacey R. Minton) <cbrownscc@sccourts.org>**Subject:** RE: Sept. 13 Faltas matter continued due to lack of Court Reporter/Court Monitor

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

I am not available Nov 8<sup>th</sup> or Nov 11<sup>th</sup> but I am available AT THIS TIME for any other dates excluding accepted holidays of course.

I have informed Dr. Faltas, and she says she will be replying through her other attorney Mr. Addison.

Timothy L. Griffith, Esquire  
 Attorney at Law  
 803 499-2012

**From:** Yasmeen Klein [mailto:YasmeenKlein@scag.gov]**Sent:** Thursday, August 26, 2021 9:29 AM**To:** Brown, Craig Law Clerk (Mikell Scarborough) <cbrownlc@sccourts.org>; Timothy L. Griffith <tlgriffith@tlgriffith.com>; Dan Addison <DAddison@hallboothsmith.com>; James, Marshall S <Marshall.James@columbiasc.gov>**Cc:** Brown, Craig <cbrownj@sccourts.org>; Brown, Craig Secretary (Stacey R. Minton) <cbrownscc@sccourts.org>**Subject:** RE: Sept. 13 Faltas matter continued due to lack of Court Reporter/Court Monitor

Good Morning,

I am unavailable during the weeks of September 27<sup>th</sup> - October 1<sup>st</sup>, November 29<sup>th</sup> - December 3<sup>rd</sup>, and December 13<sup>th</sup> - December 17<sup>th</sup> due to court and other conflicts. However, outside of those dates my schedule is open.

Please let me know if I can provide any other information.

Best,

**YASMEEN E. KLEIN**, Assistant Attorney General  
Office of the South Carolina Attorney General  
Post-Conviction Relief | Office 803-734-2875  
P.O. Box 11549 | Columbia, SC 29211  
[scag.gov](http://scag.gov)

**From:** Brown, Craig Law Clerk (Mikell Scarborough) <[cbrownlc@sccourts.org](mailto:cbrownlc@sccourts.org)>

**Sent:** Wednesday, August 25, 2021 12:40 PM

**To:** Timothy L. Griffith <[tgriffith@tgriffith.com](mailto:tgriffith@tgriffith.com)>; Dan Addison <[DAddison@hallboothsmith.com](mailto:DAddison@hallboothsmith.com)>; Yasmeen Klein <[YasmeenKlein@scaggov](mailto:YasmeenKlein@scaggov)>; James, Marshall S <[Marshall.James@columbiasc.gov](mailto:Marshall.James@columbiasc.gov)>

**Cc:** Brown, Craig <[cbrownj@sccourts.org](mailto:cbrownj@sccourts.org)>; Brown, Craig Secretary (Stacey R. Minton) <[cbrownsc@sccourts.org](mailto:cbrownsc@sccourts.org)>

**Subject:** Sept. 13 Faltas matter continued due to lack of Court Reporter/Court Monitor

Good Afternoon,

Hope all is well, home and work.

Court administration informed me today that they cannot provide a Court Reporter or a Court Monitor for this hearing. In light of this, Judge Brown has decided to continue this hearing.

If you all could please send me some dates that work for you between now and December to reschedule this hearing, I will work to get this on the calendar as soon as possible. Mr. Griffith and Mr. Addison, if you all could coordinate amongst yourselves and one of you send me the dates that work best for Dr. Faltas, I would appreciate it.

Sincerely,

**Ross Scarborough**

Law Clerk to The Honorable D. Craig Brown  
Circuit Judge, At-Large, Seat Number 8  
181 N. Irby Street  
Suite 3605  
Florence, SC 29501  
Office: (843) 679-7156  
Fax: (843) 679-7157  
Cell: (843) 743-9339

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