
No: 24-7298

IN THE
SUPREME COURT OF THE UNITED STATES

THURMONDO R. GUESS SR,
Petitioner,

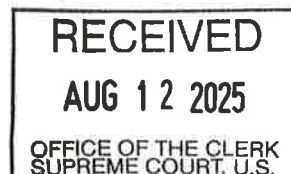
v.

Leonardo Brown, As Richland County Administrator al.,
Respondents,

Reply Petition for Writ of Certiorari
To the United States Court of Appeals
For The Fourth Circuit

Reply Brief in opposition to Respondents Brief against Petitioner Writ Of Certiorari.

Thumond R. Guess Pro-Se Petitioner
2211 READ STREET APT. 212
COLUMBIA, S.C. 29204
(803) 354-8230-803-376-7814



The Petitioner will move and show that before any law suit was filed that the Respondents was warned that the Easement Right of Way Deed was a SCAM, and affidavit was false by the other respondents, Jackson, Green, and English. If the court would review Exhibit A, letter concerning the Easement Right of Way Deed. The Petitioner receives the Easement Right of Way Deed on January 20 2022, the date of this letter is March 30, 2022.

REASON FOR GANTING THE PETITION

See letter of LEONARDO BROWN RICHLAND COUNTY GOVERNMENT EXHIBIT A.

RESPECTFULLY SUBMITTED



THURMOND R. GUESS SR.

2211 READ STREET APT. 212

COLUMBIA, S.C 29204

(803) 354-8230, (803) 376-7814

Exhibit A, PETITIONER.



March 30, 2022

Thurmond Guess
3111 Two Notch Road, Apt 124
Columbia, South Carolina 29204

RE: 3004 Dell Drive – Drainage Easement dated 1991

Dear Mr. Guess:

This letter serves to inform you of the County's position following our review of your claim that you presented during the Citizen Input at the February 15, 2022 Richland County Council Meeting.

The rear yard drainage easement you shared with us provides for the continuity of lands to be used for storm water drainage and has been in effect for over 30 years. After we consulted with our County Attorney's Office, we learned the time for contesting the signatures or any aspect of the document should have occurred within the first two years of the execution of the Easement and Right-of-Way Deed. Therefore, the deed is a valid document as it was not challenged within the appropriate time and should remain in effect without Richland County releasing it and having to execute a new deed.

The Department of Public Works has removed a clog in a pipe within the easement that was affecting drainage. The Department will be returning to perform more extensive work in all the ditches that interconnect and provide drainage service. Easements like this one are critical for that maintenance to be possible.

Sincerely,

A handwritten signature in black ink that reads "Leonardo Brown".

Leonardo Brown, MBA, CPM
County Administrator
Richland County Government