# IN THE COURT OF APPEALS OF TENNESSEE WESTERN SECTION, AT JACKSON

HWANG (Pro Se)	
PLAINTIFF-APPELLANT,	
	No. W2023-01703-COA-R3-CV
	Shelby County Circuit Court: CT-4094-20
VS.	
SAINT FRANCIS HOSPITAL, in other Tenet Healthcare Corporation;  ARITA; CITY OF MEMERON (MEMPHIS POLICE DEPARTMENT, MEMPHIS FIRE DEPARTMENT),  DEFENDANTS-APPELLEES.	
REPLY BRIEF OF APPE	LLANT, HWANG
Hwang (Pro Se)	
Dated: October 25, 2024, Friday (10/2	25/2024). [Oral Argument Requested]

1. The appellant submits/files this reply brief in reply to the brief of the appellee pursuant to TRAP. Rule 27(c).

# 2. About/in term of **ARGUMENT I** of BRIEF OF APPELLEE, ARITA.

"Appellant's brief fails to comply with the requirements of Tennessee Rule of Appellate Procedure 27 and Tennessee Court of Appeals Rule 6; therefore, Appellant's issues should be considered waived and the appeal dismissed."

<u>The appellant's reply</u>: The appellant argues/replies that the appellant Hwang is going to file a motion for leave to amend his brief or to file an amended brief.

The appellant's another reply & additional comment: The appellant argues/replies that there were crime, suspected crime, allegations/possibilities/issues of such crime or suspected crime, and litigation interference/disruption during the legal proceedings of this matter.

The appellant did not and does not waive his issues.

If the appellee argues that the Appellant's brief fails to comply with the requirements of Tennessee Rule of Appellate Procedure 27 and Tennessee Court of Appeals Rule 6, that was the result of such crime or suspected crime.

The appellant argues that he did not and could not have a fair process of the litigation because of the consequences of such crime.

(The allegations/possibilities/issues of) Such crime or/and suspected crime came not only from the Circuit Court of Shelby County of Tennessee at Memphis, but also from the Court of Appeals of Tennessee at Jackson, too.

The appellant Hwang has been suffering from, and is suffering from the consequences of such crime until as of right now since the time of occurance of such crime.

3. About/in term of <u>ARGUMENT II</u> of BRIEF OF APPELLEE, ARITA.

"The Trial Court did not commit error when it entered its written order on a decision made prior to the filing of Appellant's third Rule 10B Motion."

<u>The appellant's reply</u>: The appellant argues/replies that the appellant Hwang does not agree with the appellee to his point/argument. Hwang challenges/is going to challenge the appellee's point(s) at this court and at the higher courts. And/or Hwang is going to make constitutional challenges about any statues/precedents/cases' laws or/and any rules about/in terms of those aspects.

4. About/in term of **ARGUMENT III** of BRIEF OF APPELLEE, ARITA.

"Appellant's conduct in the discovery process was contumacious, and the Trial Court properly dismissed Appellant's case due to Appellant's repeated discovery violations."

<u>The appellant's reply</u>: The appellant argues/replies that the appellant Hwang could not have a fair process of the legal proceedings in this matter because of crime and litigation interference which were mentioned above.

Furthermore, there were crime or/and allegations of crime not only from the known and unknown suspects, but also even from the attorney and the judge.

5. About/in term of **ARGUMENT IV** of BRIEF OF APPELLEE, ARITA.

"Similar to the other issues raised on appeal by Appellant, his unsupported assertions of judicial misconduct and related allegations are frivolous and do not constitute a justiciable issue."

The appellant's reply: The appellant argues/replies that criminal investigations are

extremely necessary about/in this proceedings in this matter. And additional complaints/actions can/may/should/will/must be filed in/about this matter including, but not limited to civil complaints and/or criminal ones(complaints).

- 6. The Appellee presented the following additional issues for review on appeal. Therefore, the appellant argues/replies as below.
- 1. Whether Appellant's appeal should be dismissed for failure to comply with the briefing requirements of the Tennessee Rules of Appellate Procedure and applicable rules of this Court.

<u>The appellant's reply</u>: The appellant already answered/replied/argued above in the paragraph number 2.

2. Whether this appeal should be deemed frivolous with costs and attorney fees assessed to Appellant.

<u>The appellant's reply</u>: This appeal was not, and is not frivolous at all. And such costs and attorney fees should not be assessed to the appellant Hwang.

7. Additional comments by the appellant Hwang.

The appellant Hwang has been and is under extreme level of stress until recently and right now.

And one of the most serious and shocking elements/factors about the stress is related with or/and originated from the allegations of crime from the courts.

- 8. Additional documents/motions/actions can/may/should/will/must be filed or/and submitted in this matter by the appellant Hwang.
- 9. <u>Conclusion</u>: The ORDER OF INVOLUNTARY DISMISSAL WITHOUT PREJUDICE should not be affirmed. The final order of the trial court should be reversed and/or vacated. This case should be remanded to the lower court for resolution. Judgment in HWANG's favor should be rendered.

## Respectfully submitted,

#### CERTIFICATE OF COMPLIANCE

I hereby certify that I tried to comply with the formatting requirements set forth in Supreme Court Rule 46. Based upon the word count of a word processing system and excluding the sections set forth in § 3.02(a)(1), this Reply Brief of Appellant contains 4,856 words (including empty space.) It contains 4,109 words without empty space.

Hwang (Pro Se), Dated: October 25, 2024, Friday (10/25/2024).

### CERTIFICATE OF SERVICE

I hereby certify that I have sent (or will sent) a copy of the foregoing electronically or via Email to:



Hwang (Pro Se), Dated: October 25, 2024, Friday (10/25/2024).

[The End] This is the end of the documents. The total pages are five (5) pages.