

IN THE SOUTH CAROLINA SUPREME COURT

JAMES REESE,

Case No.: 2022-001413

Petitioner,

**RECEIVED**

vs.

OCT 25 2022

**MOTION TO REOPEN  
AND JUDICIAL NOTICE  
OF FACTS**

RICHIE BARNES,

**SC Court of Appeals**

Respondent.

**RECEIVED**  
OCT 19 2022  
S.C. SUPREME COURT

I, James Reese, hereinafter called petitioner comes with clean hands, good conscious, and in good faith to move this Court by motion to reopen this special cause of action captioned above. A judgment was entered on this cause of action on September 7, 2022.

Petitioner requires this court to take judicial notice to the following substantial facts for this matter to be reponed or reconsidered;

1. Petitioner suffers an extreme disability that has impaired my vision which effects my ability to read and retain information at an average pace;
2. Petitioner is not a license attorney and is not schooled in law and is deemed disabled to the rules at law;
3. Petitioner has been extremely financially prejudiced by these proceedings for I lack the sufficient income to acquire the resources and material needed in the preparation of my defense, such as printer accessibility, paper, ink, mailing cost, law library book rentals, and other resources information;
4. Petitioner's impaired visions has caused an extreme disability in my abilities to travel;
5. Petitioner is disabled and on a fixed income;
6. Petitioner's financial disability has caused the lack funds and resources to hire a constitutional and competent contract attorney to consult me in this cause;

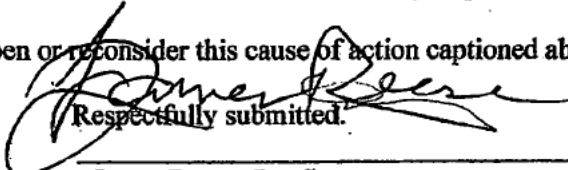
1 7. Petitioner can show on the face of ('prima facie') the inferior courts record that respondent  
2 and his attorney have committed a willful act of perjury in order to unjustly enrich themselves  
3 further wasting this courts time and resources;

4 8. Petitioner can produce, without raising any new issue to this superior court, factual and  
5 proper evidence that the inferior court erred in its decision and made a mistake by  
6 disqualifying my selected jurors from jury trial and replaced each selected juror with jurors  
7 not selected or consented by me;

8 9. Petitioner can produce that court selected jurors were not of my peers which resulted in an  
9 unfavorable and an extreme prejudice judgement against me and my persons.  
10

11 Failure for this court to use its equitable discretionary power to aid petitioner who is disabled will  
12 create further extreme irreparable harm clogging my equitable right to relief.

13 FURTHERMORE, for these substantial reasons mentioned above I hereby require this court of  
14 prerogative and competent jurisdiction to reopen or reconsider this cause of action captioned above.

15   
16 Respectfully submitted.

17 James Reese, Pro Se

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SC Court of Appeals

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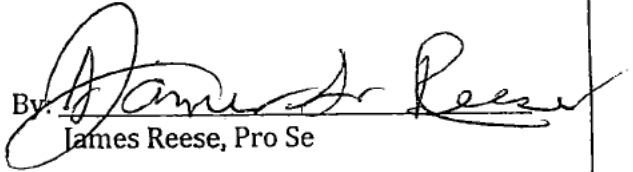
**PROOF OF SERVICE**

RICHIE BARNES,  
Respondent.

The undersigned now declares that.

Petitioner hereby electronically delivers to SOUTH CAROLINA SUPREME COURT a 'MOTION  
TO REOPEN AND JUDICIAL NOTICE'.

Dated: October 19, 2022

By:   
James Reese, Pro Se

CC: RICHIE D. BARNES

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S.C. SUPREME COURT



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*James S. Reese*  
*717 Cindy Dr.*  
*Columbia, SC*  
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OCT 25 2022

SC Court of Appeals

*SC Court of Appeals*

*P.O. Box 11629*

*Columbia, SC*  
*29211*