

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Cherokee County

Honorable G.D. Morgan, Jr, Circuit Court Judge

EDDIE MOTTS

V. PETITIONER

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO, 2022-001264

PRO SE BRIEF

RECEIVED

SEP 08 2023

S.C. SUPREME COURT

EDDIE MOTTS # 114069

E.C.I F-4-A-274

610 Highway 9 West

Bennettsville, SC 29512

ARGUMENT

NO. 1 I was hindered from meeting
My burden of proof under SCRPC 71.1(e)
Because My PCR ATTORNEY Richey Rodney
failed.

To obtain the evidence.

I asked him To obtain.

The following letters are in order.

(1) Frist letter To Richey Rodney,
February 17-2021 Time 12:00 P.M
Page 1-of-1

My ATTORNEY Dean Cook,
said Dont Do Direct Appeal.
Judge didnt make a mistake.
Do a PCR you will Get out quicker.

I sent Richey Rodney copies of witnesses,
I needed To subpoenaed on my behalf.
(End of letter) ATT.1

(2) Second letter To Richey Rodney,
February 17-2021 Time 2:35 P.M
Page 1-of-3

Attorney Dean Cook said they clean,
them up. The (Video).

And video had been altered and remade.
The video was not real.

where there wasnt any video they made
video.

They are of the New place.
After it was remodeled.

All forensic photograph and video will
show the old place. — (Continuance)

(2) Second letter to Richey Rodney
February 17-2021 Time 2:35 P.M
Page 1-of-3

Brandon Ramsey was supposed of got shot.
Didn't happen.
Video was made up.

second letter of Richey Rodney
February 17-2021 Time 2:35 P.M
Page 2-of-3

Charles Lipscomb tried to kill.
Eddie Motts.

Police was in on it too.
I can prove it.

They made a conspiracy against me
I should have not testified.

It was not good.

I have a lot of state ments
They said there was not any.
They testified To that.
I didnt have a bond at all.

(Continuance)

(2) Second letter To Richey Rodney
February 17-2021 Time 2:35 P.M
Page 3-of-3 ATT. 2

Medical and Forensic records and
Video and photograph of any type.

I have Tried to get them Time after Time.
(End of letter) ATT. 2

(3) Third letter To Richey Rodney
February 23-2021 Time 10:30 A.M
Page 1-of-1

My ATTorney Dean Cook.

Said that you could let him know.

He will send you all evidence you need.

Eddie Motts said,

And i will send you all the copies i have.

(End of letter) ATT. 3

(4) Fourth letter To Richey Rodney

November 30-2021 Time 10:00 A.M

Page 1-of-8

Dean cook said that i will see all evidence against me. I didnt.

Dean Cook said there were very few picture on the video recording.

when i got To court; I could see 150 or more.

Dean Cook said he would see who Barry-Barnette was going To call for witnesses.

He said he would let me know then who he was going To call, That never happen.

Dean Cook said they wont me to have a mental health examination.

(Continuance)

Fourth letter to Richey Rodney,
November 30-2021 Time 10:00 A.M

(4) Page 2-of-8

I had said To The examiner there are
some video on the shooting.
The examiner said they will send for it.

Barry Barnette sent a blank video Disc
To The examiner. (I have copies).

Dean Cook said if i could make bond.
we would spend a ~~to~~ lot of Time Together

Fourth letter to Richey Rodney
November 30-2021 Time 10:00 A.M
Page 3-of-8

They didn't set a ~~me~~ bond for me.

(Continuance)

(4) Fourth letter to Richey Rodney

November 30-2021 Time 10:00 A.M

Page 4-of-8

I had told Dean Cook about a fight.

me and Brandon Ramsey had some years back.

If i new Brandon Ramsey came in the place.

I never would have come in the place at all.

Fourth letter to Richey Rodney

November 30-2021 Time 10:00 A.M

Page 5-of-8

Dean Cook, The frist thing he came to me,
when i walk in court.

And said to me, you know where all the bullet
caseing landed.

I said yes.

Sign here on this line, on this paper.

And i will sign it,

Then i will let Barry Barnette to sign it.

They took me to my set and sat me down.

(Continuance)

(4) Fourth letter To Richey Rodney,
November 30-2021 Time 10:00 A.M
Page 6-of-8

I Told Dean Cook The video was right.
Dean Cook said they clean them up.

The video was new, it does not match,
with the Forensice.

I told the Judge, The video was re made,
The Judge stop me.

He said he redacted it.

Judge said to the jury.

Not To think or speculate,

As To what may or may not have been,

contained in those portions. Judge said

Fourth letter To Richey Rodney,

November 30-2021 Time 10: A.M

Page 7-of-8

I never saw any evidence befor court.

All video was re made after they had

remodel the place.

The remakeing of the video.

(Continuance)

(4) Fourth letter to Richey Rodney,
November 30-2021 Time 10:00 A.M.
Page 7-of-8

Video was remade over to show that
Eddie Motts was the only one with a gun.
Tony Lipscomb had a gun to,
He tried to shoot me.

Dean Cook help them with a conspiracy.
I pay Dean Cook to help me.
Dean Cook didn't show any forensic,
evidence are any medical recorders.

Fourth letter to Richey Rodney
November 30-2021 Time 10:00 A.M.
Page 8-of-8 (End of letter) ATT. 4

(5) Fifth letter to Richey Rodney,
December 3-2021 Time 8:00 A.M.
Page 1-of-1

In close you will find what i have written,
I would like to know what kind of evidence
you have got.

(End of letter.) ATT. 5

(6)

Sixth letter To Richey Rodney

April 1-2022 Time 10:45 p.M

Page 1-of-2

Dean Cook said i would see all evidence
against me.

Be for i go To court, it didn't happen.

Till i was in court, i saw a lot of evidence.

I never saw any of the photograph,
That was in court.

I ask Dean cook To stop The Trial.

He said Judge would not let him.

It had been To long

(Continuance)

(6)

Sixth letter to Richey Rodney

April 1 - 2022 Time 10:45 P.M

Page 2 of 2

The shooting of Brandon Ramsey
was all made up.

Tony Lipscomb tried to shoot me in
my head three times.
His gun didn't go off.

The End ATT. 6

My fair bite at the apple was hindered
by PCR Attorney Rodney Richey
Sending me into my PCR hearing
whit out the evidence to prove my
claims.

The following pages are from my Trial
Transcript, showing that trial witness
testimony supports my innocence.

I am sending some letter To prove that
I have been seeking The medical records,
And all the evidence.
I need to help me.

And some of the Trial Transcript portion.

That Tell That i was being harass and
Bullyed and Threaten while i was Drunk.
To the point i was in Danger.
That i had to use Self Defense.
To protect me from to men.
After the Bartender holler out my name.

A bite later when Tony came to me,
with Brandon.

At the Time i didnt Know either one
of them men.

Tr. 134

2- That's The frist Time Tony came To me.
after that when i encounter Them,
Tony and Brandon.

Tony Lipscomb

Tr. 101

1- He's pulling out his gun,
I don't have my out.

Tr. 103

7- Brandon out The front Door,
He was not in the Bar when i started
shooting

Tr. 105

10- Tony said his gun laying on The Bar.

Tr. 132

12- I was pointing my finger,
14- Tony is pointing his gun.

Tr. 134

2- Tony said he walk up to me.
That is when Tony started harass me.

Tr. 138

18- Tony pulled a Knife on me.
And Brandon started.

Tony Lipscomb

Tr. 139

6- Tony has pulled a pool stick a knife on me.

And Bullyed and threatening me.

Tr. 140

8- Tony said he was going to hite me with pool stick.

Tr. 145

12- Tony said no he was not afraid.

21- cause he was face to face and he was in striking distance.

Eddie MOTTs

Tr. 263

1- He had a gun pointing at me

3- I beat him to the draw.

5- you seen both of

6- us had the gun up. He just did a little late firing.

25- I shot cause i busted every one of

~~264~~

Tr. 264

1- Them glasses.

3- All three glasses.

I shot 5- five shots, Three plate glass window, and 2- Tow shots in Tony because he had a gun pointed at me.

I shot 3- plat glasses, 2- at Tony.

none at Brandon Ramsey.

ATT. 9 Copy February 2-2021 Letter

my Attorney Dean Cook told me not to.
He said the judge didn't make any errors.
He told me to do a PCR so I did.
That is why I say Dean Cook made errors

ATT. 8 Copy January 31-2022 Letter

I sent Rodney Richey my information.
He said he needed.

Attorney Rodney Richey didn't bring any
thing to my PCR Trial at all.

ATT. 7 Copy January 30-2023 Letter

All the writing I did for my PCR was all
for Richey Rodney to tell me.
Best of luck.

Statement ATT. 10

The statement of Charles Huskey.
prove that Brandon was on his feet.
when he ran out the Door.
Like they said on the 911 Call.
It was fake.

Statement ATT. 11

Chris Burnett witness me and Tony Lipscomb.
Draw down on each other and i shot twice.
and Tony shot twice.

Statement ATT. 12

OFFicer Candice Mabry
Statement prove she lying.
I need the medical ~~ex~~ records.

CONCLUSION

This Court Should Grant
My Pro Se Brief, and Reverse
and Remand back to the lower PCR
Court, To ~~the~~ allow me to get my full
bite at the apple as I am entitled.

S/ Eddie J. Motts

Eddie J. Motts # 114069

E C I 610 Hy 9, west

Bennettsville SC 29512

8-30-23

Date