

State of South Carolina  
County LAURENS  
RUSSELL Leon DAVID sr #240689

VS.

State of South Carolina

IN The Court of Common PLEAS  
EIGHTH JUDICIAL CIRCUIT

2013-CP-30-0243

APPLICATION FOR  
APPOINTMENT OF COUNSEL  
**MOTION**

Pursuant to 28 U.S.C. § 1915(e)(1) Applicant  
moves for an order appointing counsel to  
represent him in this case.

- 1). Applicant is unable to afford Counsel. He has requested Leave To proceed in forma pauperis.
- 2). Applicant's imprisonment will greatly limit his Ability To litigate. The issues involved in this case are complex AND will require significant Research and Investigation.
- 3). Applicant's being here at Lee C.I. his limited access To The LAW Library and limited knowledge of The Law.

Wherefore, Applicant's Request That The Court Appoint A Attorney A Member of The South Carolina BAR, as Counsel in This Appeal

DATE; August 5<sup>th</sup> 2013

Russell David sr.  
Russell Leon DAVID sr. #240689  
Lee C.I.  
990 Wisacky Highway  
Bishopville, SC. 29000

**CERTIFICATE OF SERVICE**  
I certify that I, Russell DAVID sr., on  
This day August 5<sup>th</sup> 2013 Sent TO  
The LAURENS County Clerk of Court  
IN. RE: R.L.D. 2013-CP-30-0243 - S.C.

*Russell David sr.*  
#240689  
08/05/13

ANN W. LANCASTER

2013 AUG -9 A 9:11

LAURENS COUNTY  
CLERK OF COURT