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Sep 06 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from the Administrative Law Court  
Honorable S. Phillip Lenski, Administrative Law Judge

ALC Docket No. 2024-ALJ-15-0002-AP

JOSEPH KELSEY, # 217218 .....APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT OF  
PROBATION, PAROLE, AND PARDON SERVICES .....RESPONDENT.

**MOTION FOR LEAVE TO PROCEED  
IN FORMA PAUPERIS**

Appellant, Joseph G. Kelsey, respectfully moves this Court for leave to proceed *in forma pauperis*. Appellant is presently incarcerated and does not have the funds available to pay the costs of filing and service in the present matter, and undersigned counsel represents Appellant in this matter *pro bono*. Appellant’s affidavit is attached.

Respectfully submitted,

/s/ Allison Franz

Allison Franz

Justice 360

900 Elmwood Ave., Suite 200

Columbia, SC 29201

(803) 765-1044

allison@justice360sc.org

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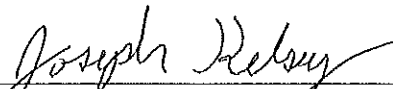
v.

SOUTH CAROLINA DEPARTMENT OF  
PROBATION, PAROLE, AND PARDON SERVICES .....RESPONDENT.

APPLICATION TO PROCEED WITHOUT PAYMENT OF COSTS AND AFFIDAVIT  
IN SUPPORT THEREOF

I, Joseph G. Kelsey, hereby apply for leave to proceed in this action without prepayment of fees or costs or security therefor. In support of my application I declare under penalty of perjury that the following facts are true:

- (1) I am the appellant in this action, and I believe I am entitled to redress.
- (2) Because of my poverty I am unable to pay the costs of said proceeding or give security thereof.

  
\_\_\_\_\_  
Joseph G. Kelsey, Appellant

Sworn or affirmed to and subscribed before me this  
29<sup>th</sup> day of AUGUST, 2024.

  
\_\_\_\_\_  
Notary Public for the State of South Carolina

My commission expires: 12/08/2032

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that a copy of Appellant's Notice of Appeal and Motion to Proceed *In Forma Pauperis* were served on opposing counsel by first-class United States mail, postage prepaid, at the address provided in the Attorney Information System:

Matthew C. Buchanan  
S.C. Department of Probation, Parole and Pardon Services  
PO Box 207  
Columbia, SC 29202

Service was made on September 6, 2024.

/s/ Allison Franz  
Allison Franz  
Justice 360  
900 Elmwood Ave., Suite 200  
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(803) 765-1044  
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