

From: Evans Correctional Institution
610 Hwy 9 West
Bennettsville S.C. 2951
November 13, 2024

To: Fairfield County Courthouse

Dear Sir or Madam,

My name is Sandra Outlaw, I am the mail room Supervisor room here at Evans. Mr. Sims, sent out his legal mail to you on February 27, 2024, and received it, return to sender on November 7, 2024. I am writing to you and asking for you to please excuse the package being late. It was under no fault of Mr. Sims. For some reason, the post office out on the street, sent this back to Mr. Sims.

Thank you for your kindness and understanding in this matter.

Sandra Outlaw
Mail room Supervisor
Evans Correctional Institution
Legal Log that was signed and Dated package.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Office of General Counsel
LEGAL/PRIVILEGED CERTIFIED MAIL DELIVERY LOG

Date Received	Inmate Name and SCDC Number	Sender's Name and Address	Date Mailed to Inmate Reported by [] to Inmate	Inmate Recipient's Signature	Inspected District Inmate's Presence By	Comments
	KA Shell	DLA Johnson POB 549 Winston SC 29071	NOV 12 REC'D	Korhauz & Shell	SSU	
	JFRBY	R. A. Caldwell Quail Co. 180 Magnolia SPARTANBURG SC 29306	NOV 12 REC'D	X [Signature]	SSU	
	Remelbeccia Sims 364413	Fairfield County Courthouse 101 S. Congress St #2C Windsor SC 29180	NOV 07 REC'D	X Sims	SSU	

RANDEVIOUS H. SIMS # 369413,

610 HWY 9 WEST

BENNETTSVILLE, S.C.

295.12

2. 27. 24. AD,

SIMS V. STATE OF SOUTH CAROLINA CTAL; 2023-CP-26-00332

RE: Filing of MOTION - FOR DEFAULT JUDGMENT

Dear Ms. Bonds,

PLEASE find Enclosed, Plaintiff RANDEVIOUS H. SIMS NOTICE
OF Motion - Motion For a DE Fault Judgment against DE Fendant,
Supporting A Affidavit, with Exhibits Attached, #3 COPIES

PLEASE FILE Clock Stamp plaintiffs COPIES

& Return to ME.

Thank You.

I AM Cordially


R Sims

STATE OF SOUTH CAROLINA
COUNTY OF FAIRFIELD

RANDEVIOUS H. SIMS #364413,

PLAINTIFF,

Vs.

STATE OF SOUTH CAROLINA;
ALAN WILSON, ATTORNEY GENERAL,
DEFENDANT;

IN THE COURT OF COMMON PLEAS
OF THE SIXTH JUDICIAL CIRCUIT

CASE NO. #2023-CP 20-00331

PLAINTIFF: RANDEVIOUS H. SIMS
NOTICE OF MOTION - MOTION
FOR A DEFAULT JUDGMENT AGAINST
DEFENDANT; PURSUANT TO SOUTH CAR.
SOUTH CAROLINA RULES OF CIVIL PROCEDURE 55(c)

TO: DEFENDANT ALAN WILSON (STATE OF SOUTH CAROLINA), NOTICE IS
HEREBY GIVEN THAT THE UNDERSIGNED PLAINTIFF DOES MOVE BEFORE THE
FAIRFIELD COUNTY COURT OF COMMON PLEAS JUDGE OF THE SIXTH JUDICIAL
CIRCUIT, STATE OF SOUTH CAROLINA, FOR AN ORDER OF DEFAULT JUDGMENT TO
BE ENTERED AGAINST YOU THE DEFENDANT FOR THE RELIEF IN THE COMPLAINT.
AT SUCH TIME AND PLACE AS SET BY THE COURT OF WHICH YOU THE DEFENDANT
WILL BE NOTIFIED, UNLESS OTHERWISE SPECIFIED.

THE PLAINTIFF SUPPORTS THIS MOTION WITH HIS SWORN AFFIDAVIT
INCORPORATING CASE AUTHORITIES, AND EXHIBITS ATTACHED.

S. Sims

MR. RANDEVIOUS H. SIMS #364413,
#610 HWY #9 WEST,
BENNETTSVILLE, S.C. #29512,

DATE: 2/22/2024 AD

STATE OF SOUTH CAROLINA

County of FAIRFIELD

RANDEVIOUS H. SIMS #364413.

PLAINTIFF;

vs.

STATE OF SOUTH CAROLINA;

ALAN WILSON; ATTORNEY GENERAL

DEFENDANT;

IN THE COURT OF Common PLEAS
OF THE SIXTH JUDICIAL CIRCUIT

CASE NO. # 2023-CP-20-00331

AFFIDAVIT OF RANDEVIOUS H. SIMS

IN SUPPORT OF HIS MOTION FOR
A DEFAULT JUDGMENT PURSUANT
TO SOUTH CAROLINA RULES OF CIVIL
PROCEDURES 55(c), INCORPORATING
CASE AUTHORITIES

THE PLAINTIFF RANDEVIOUS H. SIMS #364413. SWEAR UNDER OATH THE
FOLLOWING:

I

ON THE DATE OF 12.7.23; AD THE PLAINTIFF EFFECTED SERVICE OF
PROCESS OF THE SUMMONS & COMPLAINT IN THE ABOVE CASE NO. # 2023-CP-
20-00331 UPON THE DEFENDANT ATTORNEY GENERAL. ALAN WILSON PURSUANT TO
SOUTH CAROLINA CODE OF LAW § 15-9-210. SERVICE OF PROCESS ON DOMESTIC
CORPORATIONS: (a) A DOMESTIC BUSINESS OR NONPROFIT CORPORATION'S REGISTERED
AGENT IS THE AGENT OF THE CORPORATION FOR SERVICE OF ANY PROCESS, NOTICE,
OR DEMAND REQUIRED OR PERMITTED BY LAW TO BE SERVED; AND THE SERVICE IS
BINDING UPON THE CORPORATION.
SEE: PLAINTIFF'S EXHIBIT-A ATTACHED. (AFFIDAVIT OF SERVICE V. I.A. RICHLAND COUNTY
SHERIFF'S DEPT. DEPUTY SHERIFF P. WILKES, 12/07/23)

2.

Subsequently the plaintiff effected service of process of the summons & Complaint in the above case no. 2023-CP-20-00331 upon the defendant Alan Wilson pursuant to South Carolina Code of Law § 15-9-25. AFFIDAVIT AS PROOF OF SERVICE BY PUBLICATION:

In addition to the method of proof of service by publication provided by the South Carolina Rules of Civil Procedures; proof of service by publication may be made by affidavit before a notary public of this state that the appropriate notice has been printed or published.

SEE: plaintiff's Exhibit-B-Attached (S.C.D.C Form 10-14 and U.S. Postal Service Certified Mail Receipt. II. 3. 23.) ALSO SEE: EXHIBIT A.

3.

The defendant in this case no. 2023-CP-20-00331, has failed to serve a copy of his (Alan Wilson) answer to the complaint upon the plaintiff, which said deadline upon defendant's receipt of the summons & complaint was 1. 2. 24. 20 (v.i.a. certified mail), 2. 5. 24. 20 (Affidavit of service v.i.a. Richland County Sheriff's Dept 12/07/23.)

4.

Service of the summons brings civil defendant within court's jurisdiction and gives the court the power to render personal judgment against person served. SEE: LOUBEN V. MORAGINE. 337 S.C. 465; 786 S.E.2d 585 (S.C.App. 1999)

wherefore, the plaintiff has established his claim
for default by evidence satisfactory to the court ent.
- itling plaintiff to the requested relief in the co-
- mplaint as a matter of well established law!
Respectively.....

I SWEAR UNDER PENALTY OF PERJURY THAT THE ABOVE STATEMENTS
IN THIS AFFIDAVIT, INCORPORATING CASE AUTHORITIES, &
SUPPORTING EXHIBITS (DOCUMENTATION) ARE TRUE, ACCURATE,
CORRECT AND BASED UPON PERSONAL KNOWLEDGE!

S/ [Signature]

SWORN AND SUBSCRIBED BEFORE ME

THIS ~~22~~nd DAY OF ~~NOV~~^{EMBER} 2024 AD

NOTARY PUBLIC FOR THE STATE OF SOUTH CAROLINA [Signature]
My COMMISSION EXPIRES: 2/28/24

DATE: 2 22 24, AD

Exhibit A

MR RANDOLPH H. SIMS #364413,

EVANS - COLL. INST. F#L.B. #151,

#610 Hwy #9 West.

BENNETTSVILLE, S.C.

#29522

JL 22 23 AD

RE: SERVICE OF SUMMONS / COMPLAINT CASE NO: 2023-CP-20-00931
SIMS V. STATE OF SOUTH CAROLINA

TO: Sheriff LEON LOTT JR
Richland County Sheriff's Dept
P.O. Box #143,
Columbia, S.C #29202

29 Nov 2023
Sims
11/7/24

Dear Sheriff Lot,

I am respectfully requesting your office to effect service of the
Summons and Complaint (P.C. Application) enclosed upon MR. ALAN
Wilson, Attorney General for South Carolina #1000 Assembly St.
Columbia S.C, #29202, P.O. Box #11549, Cola; SC #29211-
#1549 Today at your earliest convenience; to include
affidavit of service upon MR. ALAN WILSON provided to me
for verification of service by your office.

Thank you I am cordially
R. SIMS



Richland County Sheriff's Department

LEON L. LOTT, JR.
Sheriff

Randevious H Sims#364413
Evans Corr Inst F 1-B-#151
610 Hwy 9 West
Bennettsville, SC 29512

December 7, 2023

Re: Attorney General
Alan Wilson

Dear Sir/Madam:

On 12/4/2023, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

A handwritten signature in black ink, appearing to read "Leon Lott". The signature is fluid and cursive, written over a white background.

Leon Lott
Richland County Sheriff



Richland County Sheriff's Department

DEC 06 2023

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 12/05/2023
File Number: C202308333
DSS Number: 0
Foreign Case #: 2023CP2000331

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Date

Plaintiff Randevious H Sims#364413 Evans Corr Inst F 1-B-#151 610 Hwy 9 West Bennettsville, SC 29512

Defendant(s) Attorney General Alan Wilson 1000 Assembly St. Columbia, SC 29210

PERSONALLY APPEARED Before Me [Signature: P. Wilkes], duty sworn says that he/she served, or attempt to serve, the following civil paper(s):

- Summons & Complaint 1
Other 1
Cover Sheet 1

on the defendant, ATTORNEY GENERAL, as follows:

() By personally handing the process to the defendant at [Street], [City], SC on [Date/Time]

() By handing the process to [Name of Person Served/Relationship] at [Street], [City], SC on [Date/Time], a person of suitable age and discretion then residing in the defendant's usual place of abode.

[X] By handing the process to JANE McCRAE - Adm. ASST, the registered corporate agent or officer of the company at 1000 Assembly St. Columbia, SC on 12/01/23/9:37 AM and leaving him/her a copy

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS:

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

7 day of December, 2023

[Signature: P. Wilkes]
Deputy Sheriff, Richland County

P. WILKES
S# 1195

NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES
P.O. Box 143 Columbia, SC 29202

KENNETH COLEMAN
Notary Public, South Carolina
My Commission Expires
July 15, 2024

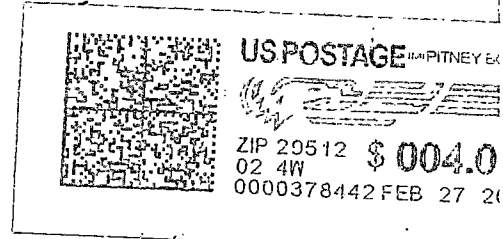
Exhibit B

Ramondarious Sims 364413 FI-B143

E.C.I

610 Hwy 9 west
Bennettsville SC 29512

1B0149 MB040



Fairfield County Courthouse
101 S. Congressst Ste. 201
Winnsboro SC 29180

NOV 07 RECD. NAME

NIXIE 274 SE 1 0203/15/24
 RETURN TO SENDER
 NOT DELIVERABLE AS ADDRESSED
 UNABLE TO FORWARD
 EC: 29512213010 2040N075192-01442