

State of South Carolina } IN THE COURT OF APPEALS
Angelo HAM, #315014, } CA No.: 2025-003018
Appellant, }
vs. } Appellants Motion TO
S.C. Dept. of Corrections, } Compel
Respondent. }

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JUN 02 2025
SC Court of Appeals

The Appellant, Angelo HAM, hereby move this Honorable Court to compel the Respondent, S.C. Dept. of Corrections, to respond to the Appellant's First Set of Requests For Production of Documents. In support of their motion, Appellant would respectfully show the Court as follows:

On April 14, 2025, the Appellant served on the Respondent the First Set of Requests For Production of Documents pursuant to Rule 34 of the South Carolina Rules of Civil Procedure (A copy of said Requests For Production are attached hereto as Exhibit "A").

Said responses to these discovery requests were due on MAY 14, 2025 but no later than MAY 19, 2025.

As of this date, the Respondent has failed to provide the Appellant with said responses or explanations.

Wherefore, the Appellant hereby move this Honorable Court to compel the Respondent, S.C. Dept of Corrections, to provide such responses and documents and such other and further relief as this Court may deem just and proper.

MAY 27, 2025

Respectfully Submitted,



Angelo Ham #315014

P.C.F. / Q3B #120

430 OAKLAND ROAD

Pelzer, S.C. 29469

State of South Carolina } In the Court of Appeals
Angelo Ham, #315014, } Case No.: 2025-000018
Appellant, }
vs. } Certificate of Service
S.C. Dept of Corrections, }
Respondent. }

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I, Angelo Ham, hereby certify that an original copy of the "Appellant's Motion to Compel", in the above-cited matter was this day served on the Respondent by depositing a copy of the same in the U.S. Mail, postage prepaid, to the following:

S.C.D.C.
Office of General Counsel
444 Broad River Road
P.O. Box 21787
Columbia, S.C. 29221-1787

MAY 27, 2025



Angelo Ham #315014
P.C.I. / Q38 #120
430 OAKLAND ROAD
PETER, S.C. 29469

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SC Court of Appeals

S.C. COURT OF APPEALS
P.O. BOX 11629
COLUMBIA, S.C. 29211-1629


Re: Angelo Ham v. S.C.D.C.
Case No.: 2025-000018

Dear Honorable Kitchings:

Enclosed please find an original copy of the "Appellant's Motion to Compel" in the above-cited matter.

With personal kindest regards, I am

Sincerely,



Angelo HAM #315014
P.C.I. / Q3B #120
430 OAKLAND ROAD
PATER, S.C.
29409

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SC Court of Appeals

SC Court of Appeals
P.O. Box 11429
Columbia, S.C.

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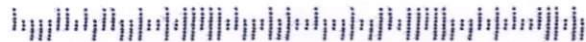


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