

State of South Carolina } IN THE COURT OF APPEALS

} CA No.: 2025-000018

Angelo Ham, #315014,  
Appellant,

vs.

Appellant's First Set of  
Requests For Production  
of Documents

S.C. Dept. of Corrections,  
Respondent.

**RECEIVED**

JUN 02 2025

SC Court of Appeals

Pursuant to Rule 34 of the S.C. Rules of Civil Procedure, the Appellant, Angelo Ham, hereby requests that the Respondent, S.C. Dept. of Corrections, produce the following documents and things within thirty ("30") days from the date of service hereof. These requests for production of documents and things shall be continuing in nature until the day of trial, and you are instructed to serve supplemental responses to the extent required by the S.C. Rules of Civil Procedure.

## Instructions

- 1.) You must serve a written response within thirty ("30") days after service of this request. Your response must state that production and related activities will be permitted as requested or that the requested production is objected to, in which event the reasons for your objection must be stated.
- 2.) Documents produced for inspection must be produced as they are kept in the usual course of business or be organized and labeled to correspond with the categories in this request.
- 3.) For each document withheld from production on the ground of attorney-client privilege, work product doctrine or any other privilege:
  - (a) describe the nature of the privilege.
  - (b) describe the document by author, addressee, or recipient, date, type (Memorandum, letter, invoice, notes, etc.) and general subject matter.

## Request For Production of Documents

- 1.) Inmate Property Inventory dated September 23, 2022;
- 2.) Inmate Property Inventory dated MAY 6, 2024;
- 3.) Inmate Property Inventory dated MAY 14, 2024;
- 4.) Canteen receipts of Appellant dated September 23, 2022 thru MAY 6, 2024; AND
- 5.) Access SecurePak receipts of Appellant dated September 23, 2022 thru MAY 6, 2024.

April 14, 2025

Respectfully Submitted,  


Angelo HAM #315014

P.C.I. / Q3B #218

430 OAKLAWN ROAD

Pelzer, S.C. 29669

State of South Carolina } IN The Court of Appeals  
Angelo Ham, #315014, }  
Appellant, }  
vs. } Certificate of Service  
S.C. Dept of Corrections, }  
Respondent. }

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SC Court of Appeals

I, Angelo Ham, hereby certify that an original copy of the "Appellant's First Set of Requests For Production of Documents," 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:

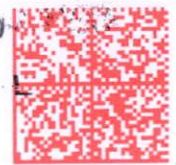
S.C. D.C.  
Office of General Counsel  
444 Broad River Road  
P.O. Box 21787  
Columbia, S.C. 29221-1787

April 14, 2025



Angelo Ham #315014  
P.C.I. / Q3B #20  
430 OAKMAN ROAD  
Peter, S.C.  
29409

COLUMBIA SC 290  
29 MAY 2025PM 3



US POSTAGE PAID PITNEY BOWES  
  
ZIP 29210 \$ 000.97<sup>0</sup>  
02 4W  
0000378725 MAY 29 2025

**RECEIVED**

JUN 02 2025

SC Court of Appeals

P.O. Box 11429

Columbia, S.C.

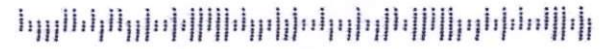
29211

**RECEIVED**

MAY 27 2025

PCI MAILROOM

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**LEGAL MAIL**