

Robert Graham, Jr, # 178039, Appellant,
V.

COPY

12-29-2025
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File

South Carolina Department of Corrections.
Respondent.

public interest SCACR, 65(F)(1)

RE: Appellant case No. 2025-0024

Subject: Notice of motion for same
appointment counsel

SC Court of Appeals

DEC 29 2025

RECEIVED

my certificate
Service

Dear Hon: Kitchens:

Be fore this chief judge Appellant. MAKES.
Kind enclosed an original copy for
filing, and clerical processing before
the court" under the unprecedented
retaliations, denial access to court,
holding my mail as "prettend" before
this court in the records, pursuant
to SCACR. 65(F)(1)" my copy
is forwarding money order paying
for copies - sent to "Christine B
Sgallow, Esquire. I'm constantly lock
down to no fault of my own. And
have no ability afforded to get
copies - more retaliations.

Christina Bigelow
(Soddy) 4444 Broad River Rd Columbia
SC 29211
1st Robert Graham
Approved.

#128039
Mr. Robert Graham Jr., Appellant,
V. South Carolina Department of Corrections
Respondent,

1 of 2
12-21
2025

Re: case No.: 2025-00241

subject: SCDC
misconduct,

Notice / Motion
appointment, coun-
sel, and / or
sanctions

Date Dec 22th 2025

Rule 65(F)(1)

Dear Hon. Clerk Kitchens:

Appellant, herewith, makes this court
and "Judge - for sanctions consistent"
with the record before it - it's broad
discretion for "appropriate sanction for
spoliation, obstruction of mail by re-
spondents, mail forward, mail tamper-
ing, impeding administration of
justice, obstruction of justice -
in a conspiracy to prevent, knowingly,
ly, deliberately, intentionally, Appell-
ant due process protected, well know-
n, secured rights of "free speech,
punitive, and remedial rationales
underlying clear spoliation doctrine.
court must find some form of mede-
cation to remedy "flagrant" degree
of faults by respondents SCDC sanctions.

STATEMENT OF FACTS 1 of 3

where the appellate court agrees with appellant in its findings of facts, its reviews of the record, exhibits, affidavits, it looks for an abuse of discretion standard.

southeastern site prep, LLC v. Atlantic coast Builders and contractors, LLC

Argument # 1

Basiss, for motion / notice for sanctions appointment of counsel Verbatim" and motion pending, stems from fraud, abuse of power, authority, discretion and official duties by same courtroom staff as presented beyond conjecture, or speculative matters; misrepresentation of ethics, morals or required integrity in their individual / official capacities verbatim

Verified complaint Rule

65(d), order granting relief is also based, injunctive relief for restraint is preventing irreparable harm, CF) (1) summons complaint to notice for evidentiary hearing. within 30 days respondent pay costs.

Argument # 2

1 of 4

court of appeals reviews a motion to
decision on granting relief for sanctions,
appointment of counsel, when evidence
before it exceeds the integrity of
administrative, penal, judicial funda-
mental behavior - by opposing party
abuse of discretion in pursuit of
carrying out daily functions in liti-
gation, filing motions, fiduciary duties,
to conceal, tamper with, not re-
port unethical behavior - or for
defending and protecting each other
where clear breach of duties, oaths,
policies are being arbitrarily or
conspicuously violated consisted here -
with Verbatim." Barlow v. Colgate Palm
olive Co. united states court of appeals
Fourth circuit NOV 25, 2014 772 F.3d
1001 2014 WL 666 1086

Date Due 22, 2025

Declaration/Affidavit

28 U.S.C. § 1746 ± Robert Amble, Jr

certify under penalty of perjury, personal,
knowledge, experience, with sound mind
the foregoing is true and correct in
lev of injunctive relief, sanctions, relief,
appointment counsel verbatim hearing.

conclusion

12-21-2023
1 OF 5
5 OF 5
R

Appellants, criminally filed "emergency" Grievance before this court. Alleged, and pointed out criminal behavior, activity by respondents (Seds), 16-5-10 con spiracy by Seds / staff to remove their names and Seds identification codes - in clear "criminal" violation of their own policy and state statute 16-16-20 (s) (A) computer tampering, replacing them with titles like "STAFF", obstruction of justice, impeding free speech and "barbarically" frustrating, and making not only appellants exhaustion remedy unavailable - for persons under 42 U.S.C.A 1983, but now, Additionally, mail fraud.

pursuant 569 F. 2d 208 United States of America vs - Elliott F. - mail fraud, tampering, hindering, is in violation 18 U.S.C.A 241, 242, Respondents cannot present arguments against the facts before this court. Appellant cannot win with (both) hands tied behind his back. Therefore to protect and secure his free speech, Mofers should to under "extraordinary" circumstances be granted habeatimi

Mr. Robert Graham, Sr. (178039)

4400 Broad River Rd. (MTB 2093)

Columbia, SC

29210

COLUMBIA SC 290

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FOREVER / USA

South Carolina Appellate Court
TO: Hon. Jenny Kitchens (Chief)
Post Office E 11629
1220 Senate Street
Columbia SC
29201

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DEC 29 2025

SC Court of Appeals

Attention ✓

29201-376999

