

THE SOUTH CAROLINA COURT OF APPEALS

APPELLATE CASE NO. 2013 002447

James Anthony Primus 252315

Appellate

MOTION FOR APPOINTMENT

V.

OF COUNSEL

SOUTH CAROLINA DEPARTMENT

OF CORRECTIONS

RESPONDENT

RECEIVED

NOV 27 2013

SC Court of Appeals

Pursuant to S.C.R.C.P. Appellate moves for and order appointing Counsel to represent him in this case in support of this motion Appellate State's

1 Appellate is unable to afford counsel He has requested leave to proceed Informa Pau Peris

2 Appellate Imprisonment will greatly limit his ability to litigate The issues involved in this case are complex and will require significant research and investigation Appellate has limited access to the Law Library and limited knowledge of the law and the South Carolina Dept of Correction law library do not have current cases the law books are at least Ten years old or older

3 A Trial in this case will likely involve conflicting testimony and Counsel would better enable Appellate

To Present evidence and cross examine witnesses

4 Appellate Has made repeated efforts to obtain a  
lawyer

WHEREFORE Plaintiff Request That THE Court Appoint

and Appellate Lawyer a member of The S.C. BAR. AS

COUNSEL In This Case

DATE November 22 2013

Respectfully Submitted

James Anthony Primus 252015

James Anthony Primus Pro. Se  
MacDougall Correctional Institution  
Magnolia unit 2 DSA  
1516 Old Gilliard Road  
Ridgeville S.C. 29472

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November 22 2013

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**SC Court of Appeals**

Ms. V. Claire Allen  
S.C. Court of Appeals  
P.O. Box 11629  
Columbia S.C. 29211

RE: James Anthony Primus vs S.C. Dept of  
Corrections

Appellate Case No. 2013-002447

Dear Ms. V. Claire Allen

In my previous response to your correspondence I  
neglected to enclose this motion for appointment of  
counsel I apologize for any inconvenience

I would like to thank you in advanced

Sincerely

James Anthony Primus