

IN THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

JOEY C. REID, APPELLANT

- v -

DENNIS KELLY
OF THE GREENWOOD DET. CENTER,
RESPONDENT

CASE No. : 2026-000968

MOTION TO PROCEED
IN FORMA PAUPERIS
WITHOUT PREPAYMENT OF
FILING FEES
AFFIDAVIT

RECEIVED

APR 29 2026

SC Court of Appeals

THE APPELLANT, JOEY C. REID, APPEARING PRO SE, DOES HEREBY SUBMIT THE FOLLOWING MOTION TO PROCEED IN FORMA PAUPERIS WITHOUT PREPAYMENT OF FILING FEES AFFIDAVIT. THE APPELLANT IS FINANCIALLY INDIGENT AND - AS A MATTER OF CONSTITUTIONAL DUE PROCESS - SUBMITS THE FOLLOWING.

I, JOEY C. REID, DECLARE THAT - DUE TO FINANCIAL INDIGENCY - I AM UNABLE TO SATISFY PREPAY FILING COSTS ASSOCIATED WITH THE INSTANT LITIGATION, AND THEREFORE, I AM LAWFULLY ENTITLED TO PROCEED IN FORMA PAUPERIS, WITH APPROVAL OF THIS HONORABLE COURT. IN SUPPORT OF THIS MOTION, I AFFIRM THE FOLLOWING UNDER PENALTY OF PERJURY:

- 1.) I AM CURRENTLY INCARCERATED IN THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS AND DO NOT RECEIVE ANY FORM OF COMPENSATION, PAYMENT OR WAGES.
- 2.) I AM CURRENTLY UNEMPLOYED, AND HAVE BEEN SO FOR GREATER THAN TWELVE (12) MONTHS.
- 3.) IN THE PAST TWELVE (12) MONTHS, I HAVE NOT RECEIVED, NOR GENERATED ANY SOURCE OF INCOME, INHERITENCE, PENSION, DISABILITY INSURANCE, OR OTHER.
- 4.) I DO NOT HAVE ANY BANK, SAVINGS, RETIREMENT OR CASH ACCOUNTS.
- 5.) I DO NOT OWN TANGIBLE, LIQUID OR FUNGIBLE ASSETS.
- 6.) I HAVE ZERO FINANCIAL DEBTS, OBLIGATIONS OR RESPONSIBILITIES OF SUPPORT.
- 7.) I DO NOT HAVE ANY LEINS OR MORTGAGES.

I AFFIRM THE FOREGOING IS TRUE AND CORRECT.

EXECUTED THIS 26 DAY OF April, 2026, IN COLUMBIA, SOUTH CAROLINA.

RESPECTFULLY SUBMITTED,

S/ Joey C. Reid

IN THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

JOEY C. REID,
APPELLANT

- v -

DENNIS KELLY,
OF THE GREENWOOD DETENTION CENTER,
RESPONDENT.

CASE No.: 2026-000968

CERTIFICATE OF SERVICE
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SC Court of Appeals

I, JOEY C. REID, CERTIFY THAT THE ATTACHED NOTICE OF APPEAL, MOTION TO PROCEED IN FORMA PAUPERIS, AND MOTION FOR ENLARGEMENT OF TIME HAVE BEEN SERVED — PURSUANT TO THE "PRISON MAILBOX RULE" AS DECIDED IN HOUSTON V. LACK — BY DEPOSITING INTO THE DEPARTMENTAL MAIL SYSTEM WITH FIRST CLASS POSTAGE DULY AFFIXED AND ADDRESSED TO:

JENNY KITCHINGS	RUSSELL W. HARTER, JR.	CLERK OF COURT
CLERK OF COURT	CHAPMAN HARTER, LAW OFFICE	GREENWOOD COUNTY
S.C. COURT OF APPEALS	P.O. Box 10224	528 MONUMENT STREET
P.O. Box 11629	GREENVILLE, SC 29603	GREENWOOD, SC 29648
COLUMBIA, SC 29211		

DATE: April, 26, 2026

51 Joey C. Reid
JOEY C. REID
KIRKLAND R/E CENTER
4344 BROAD RIVER ROAD
COLUMBIA, SC 29210

FRIDAY, APRIL 24, 2026

MR. JOEY C. REID #288142
KIRKLAND R/E CENTER A1/B-43
4344 BROAD RIVER ROAD
COLUMBIA, SOUTH CAROLINA 29210

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APR 29 2026

SC Court of Appeals

MS. JENNY ABBOTT KITCHINGS
CLERK OF COURT
SOUTH CAROLINA COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211

RE: JOEY C. REID V. DENNIS KELLY
APPELLATE CASE NO.: 2026-000968
CORRECTED DEFICIENCIES

DEAR CLERK KITCHINGS:

PLEASE FIND ENCLOSED WITH THIS CORRESPONDENCE, THE FOLLOWING DOCUMENTS TO BE FILED: 1.) MOTION FOR ENLARGEMENT OF TIME; 2.) NOTICE OF APPEAL; 3.) MOTION TO PROCEED IN FORMA PAUPERIS; AND 4.) CERTIFICATE OF SERVICE.

ON FRIDAY, APRIL 24, I RECEIVED A LETTER FROM THIS OFFICE - DATED APRIL 21, 2026 - INFORMING ME OF SEVERAL DEFICIENCIES WHICH NEEDED TO BE RESOLVED. PLEASE NOTE THAT:

- A.) "MOTION TO PROCEED IN FORMA PAUPERIS," DUE TO INDIGENT STATUS, HAS BEEN SUBMITTED TO RESOLVE FILING FEE DEFICIENCIES;
- B.) "NOTICE OF APPEAL" AND "MOTION FOR ENLARGEMENT OF TIME" HAVE BOTH BEEN SEPARATELY FILED/SUBMITTED; AND
- C.) PROOF OF SERVICE CERTIFICATES HAVE BEEN INCLUDED TO DEMONSTRATE EVIDENCE/PROOF OF SERVING "NOTICE OF APPEAL" ON THE RESPONDENT'S COUNSEL, RUSSELL W. HARTER, JR., AND GREENWOOD COUNTY CLERK OF COURT.

AS OF DATE, ALL IDENTIFIED DEFICIENCIES HAVE BEEN ADDRESSED AND RESOLVED, VIA THE DOCUMENTS ENCLOSED HEREIN TO BE FILED. THANK YOU.

JCR: RUSSELL W. HARTER, JR., ESQUIRE
GREENWOOD CLERK OF COURT
ENCLOSURE(S)

KINDEST REGARDS,

S/ Joey C. Reid

Mr. Jody C. Reid # 288142

Kirkland R/E Center A1/B-43

4344 Broad River Road

Columbia, South Carolina



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SC Court of Appeals

Ms. JENNY ABBOTT KIRCHINGS, CLERK

SOUTH CAROLINA COURT OF APPEALS

Post Office Box 11629

Columbia, South Carolina 29211

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Kirkland R&E Center
Mailroom

