

STATE OF SOUTH CAROLINA
County of Richland
Mr. Eddie L. Hall #184752
Petitioner,

vs,
State of South Carolina,
Attorney General,
Respondent.

^{short}
IN THE COURT OF
COMMON PLEAS
A/No: 2013-CP-400-2591

Summons For
State Habeas Corpus

Attention: To Respondent, from Kershaw C. I.
Palmetto DB Room 33B, 4848 Goldmine Highway
Kershaw, S.C. 29067.

Notice is hereby given that 20 days from
service or receipt of this summons and
petition for writ of State Habeas Corpus that
you are hereby required to answer or other
wise Plead or Cause Petitioner to be brought
before the Court of Common Pleas to certify
the true cause of imprisonment, or judgment
would be taken against Attorney General by
Default for Relief Demanded in this Petition.

RECEIVED

MAY 09 2013

STATE GRAND JURY-
PROS SECTION

5/8/13
Bj

Attention: From Kershaw C. I.

Respectfully Submitted

Eddie L. Hall

Mr. Eddie L. Hall, Christian Jew
Kershaw C. I. Palmetto BR. 33 #184752
4848 Goldmine Highway
Kershaw, S. C. 29067

Page 2.

STATE OF SOUTH CAROLINA
County of Richland

Mr. Eddie L. Hall, #184752
Petitioner,

Vs,

State of South Carolina,
Attorney General,
Respondent.

IN THE COURT COMMON
PLEAS

Petition For Writ of
State Habeas Corpus
Pursuant To 17-17-10
South Carolina Code,
Pursuant Art 1 and 18.

I, Mr. Eddie L. Hall, comes (Pro-Se) as Petitioner who hereby request that this Court of Common PLEAS, issue or Grant this petition for Writ of Habeas Corpus and the truth based on the following issues, (1) Petitioner was denied and deprive a right to have meaningful access to ~~the~~ Court in violation of (First Amendment), (2) Petitioner was denied and deprive a right to have Equal Protection under State of South Carolina laws.

(3) Petitioner was denied and deprive a right to have Due-Process under State of South Carolina laws.

- (4) Petitioner was denied and deprive Effective Assistance of Counsel under State of South Carolina laws.
- (5) Petitioner was denied and deprive to challenge lying language in indictments, Arrest Warrants, Seizure Warrant, and Consent Order under State of South Carolina laws.
- (6) Petitioner first State of Habeas Corpus was not challenge before the Court for ~~and~~ Relief or Other wise the true cause of imprisonment.
- (7) All Above Was Denied And Deprive The Remedies Upon Exhaustion of Administrative Remedies.

Indictment Numbers

91-GS-40-7539, 4018, 7541.

Defective
in the language, Arrest warrants, D-114280,
D-14281, D-073656, was not prepared for
Grand jury in a timely matter.

Failing to act upon arrest warrants within
90 days, without requesting an extension of
time, is an act of formally Dismissal of
warrants and indictments pursuant to
South Carolina Rules of Criminal Procedure: Rule
(3c).

On the date of April 12, 1991, attorney James
P. Rogers file a legal letter to the Honorable
Walter Jones, Judge for arranging a
preliminary hearing on warrants and
indictments.

South Carolina Rules of Criminal Procedure (Rule
2A). In all cases, the request for a preliminary
hearing shall be made within ten (10) days after
the Notice.

Preliminary hearing was held nine months later, January 24, 1992, in which lateness was never challenge by attorney Howard Hammer.

In this circumstances where attorney Howard Hammer failure to make a challenge is the equivalent of an affirmative misrepresentation.

The trial Judge ask attorney Howard Hammer had Petitioner have an arrangement hearing, Attorney Howard Hammer refuse to mention Preliminary Hearing.

Attorney John M. Young on Seizure Warrant and Consent Order, is in violation of (44-53-582) of the S.C. Code of laws.

If Attorney John M. Young would had did his job as a lawyer, Petitioner would not have this petition before the Court, and relief would had been affirmative relief.

If Attorney Howard Hammer would had did his job as a lawyer, Petitioner would

had relief before trial. Attorney Howard Hammer violation is under South Carolina Code of laws (17-27-90).

Attorney Henry W. Kirkland is in violation of (P.C.R. rule 7.1 S.C.R.C.P., section D), refusing to do his job as a lawyer for Petitioner relief.

(1) Attorney John M. Young, 1105 Hampton Street Columbia, S.C. 29201.

(2) Attorney Howard Hammer 1634 Main Street Suite 201, Columbia S.C. 29201.

(3) Attorney John W. Carrigg, Jr. P.O. Box 1423 Columbia, S.C. 29202.

(4) Attorney Joseph L. Savitz III 1122 Lady Street, Suite 940 Columbia, S.C. 29201

(5) Attorney James P. Rogers, 1728 Main Street Suite 106 Columbia S.C. 29201.

Attorney John M. Young was assign to Seizure Warrant, Consent Order, (S.W) 91-CP-48-2896, (C.O) 180526.

Attorney Howard Hammer was at Preliminary hearing, Trial, and Sentencing.

Attorney John W. Carrigg, Jr. was at Trial and Sentencing.

Attorney Joseph L. Savitz III was assign to Appeal Case.

Attorney James P. Rogers, wrote a legal request to arrange a Preliminary Hearing in a timely matter.

Attorney Henry W. Kirland, was assign to P.C.R. Hearing

Exhibit (A)

No money evidence that was said to be mark money was never before the Court.

Exhibit (B)

March 26, 1991 Petitioner was arrested and charge with, Distribution of Crack Cocaine, Possession with Intent To Distribute, and Trafficking.

Exhibit (C)

Arresting Officers, Agent Ricky Crosby, Agent Robert Folk, Agent Thomas M. Griffin, Jr., Agent Allen Stone, Agent Michael A. Poole, and Agent Kenneth E. Porter, Jr..

Exhibit (D)

January 24, 1992, Preliminary Hearing was held nine months after request made April 12, 1991 Before the Honorable William T. Smith, Magistrate Judge.

Exhibit (E)

Trial Judge, The Honorable L. Henry McKellar dismiss State Writ of Habeas Corpus 98-CP-40-1253.

Exhibit (F)

All litigation is document in transcripts, and other legal documents.

All evidence litigation is document in legal documents and transcripts.

Requesting Relief.

Charges Reverse, Conviction Over Turn,
Conviction Sit Aside, Release From Prison
Custody.

STATE OF SOUTH CAROLINA
County of Richland

Mr. Eddie L. Hall, # 184752

Petitioner,

vs,

State of South Carolina,

Attorney General,

Respondent.

IN THE COURT OF COMMON
PLEAS

Application To Proceed
Without Prepayment of
Costs And Affidavit
In Support Thereof.

I, Mr. Eddie LEE Hall Petitioner hereby apply for
leave to proceed in this Writ of State Habeas
Corpus without prepayment of fees or costs
or security therefor.

In support of my application, I declare under
penalty of perjury that the following facts
are true.

I am the applicant in this action and I believe
I am entitled to redress.

Because of my poverty, I am unable to pay
the costs of said proceeding or give
security therefor.

Page 10.

Respectfully Submitted
Eddie L. Hall

Mr. Eddie L. Hall, Christian Jew
Kershaw C.I. Palmetto B.R. 33B#184752
4848 Goldmine Highway
Kershaw S.C. 29067

Sworn or Affirmed To And
Subscribed Before Me This

14 Day of April 2013

Catharine A. Comasco

Notary Public

My Commission Expires December 22, 2018

Page 11.

Kershaw CI Ker

7

FINANCIAL CERTIFICATE
FOR THE
DISTRICT OF SOUTH CAROLINA

PB 33

(for use in § 1983, Bivens, and non-habeas civil actions filed by prisoners)

I request that an authorized officer of the institution in which I am confined, or other person designated to review financial information in relation to inmate trust funds, complete this Certificate. If I have insufficient funds in my account that prohibit me from paying the full filing fee required by 28 U.S.C. § 1914, I will send with my complaint an initial installment payment, required by 28 U.S.C. § 1915, equal to the amount calculated and entered on line four by the authorized officer signing this form.

Mr. Eddie L. Hall
INMATE NAME (PRINTED)

184752
INMATE (PRISONER) NUMBER

Eddie L. Hall
INMATE SIGNATURE

Kershaw C.I.
PLACE OF CONFINEMENT

- ◆ (1) Average monthly deposits to the inmate's account.....\$ 0
- ◆ (2) Average monthly balance in the inmate's account calculated for the prior six months period.....\$ 0.19
- ◆ (3) Current Balance\$ 0.19
- ◆ (4) Initial Installment Payment (Take 20 percent of the greater of lines 1 or 2).....\$ 0

I hereby certify that as of this date, the above financial information is accurate for the above named inmate.

[Signature]
Authorized Officer's Signature

4/5/13
Date

J. Smith Fin. Acty
Authorized Officer's Name and Title

RECEIVED

APR 11 2013

KerCI
MAILROOM

RICHLAND COUNTY PUBLIC DEFENDER
RICHLAND COUNTY JUDICIAL CENTER
1701 Main Street, Post Office Box 192
COLUMBIA, SOUTH CAROLINA 29201
(803) 765-2592

April 12, 1991

The Honorable Walter Jones
1438 Huger Street
Columbia, South Carolina 29201

In Re: Edward Hall
Arrested: March 25, 1991
Charged: POSS.OF 10 GRAMS OR MORE OF COKE/ LESS THAN 28 GRA1
MANUF, DIST OR POSS W/INTENT TO DIST CRACK COCAINE2

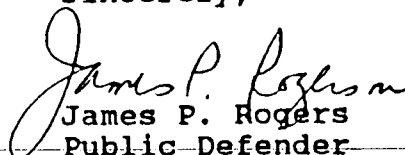
Dear Judge Jones:

Please be so kind as to arrange a Preliminary Hearing for the above-captioned individual on the charge(s) indicated and for any other charges, if any, of which the accused may not currently be apprised in accordance with South Carolina Criminal Practice Rule 2.

Please also be on notice that on the date which the Preliminary Hearing is set, or as soon thereafter as counsel is permitted to appear on behalf of the above-captioned individual, I will move for a reduction in the Defendant's bond pursuant to South Carolina Code Section 17-15-10.

Thank you in advance for your cooperation and assistance in this matter.

Sincerely,


James P. Rogers
Public Defender

/ms

cc: Solicitor's Office

RICHLAND COUNTY PUBLIC DEFENDER
RICHLAND COUNTY JUDICIAL CENTER
1701 Main Street, Post Office Box 192
COLUMBIA, SOUTH CAROLINA 29201
(803) 765-2592

April 12, 1991

Edward L. Hall
Richland County Detention Center
1400 Huger Street
Columbia, South Carolina 29201

Dear Edward Hall:

I have been appointed to represent you on your pending charge(s).

I will come visit you at my first opportunity, but because of our court schedule that may be a few days.

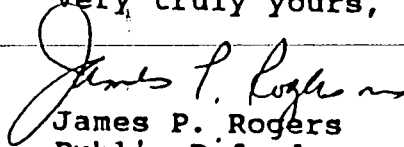
Our first responsibility will be to attempt to have you released from the jail as soon as possible. To that end you should contact friends and family to determine what financial arrangements they are able to make to assist you in the posting of bond.

If you are able to call my office, please do so. Understand, of course, that if I am in court, I will be unavailable and you may have to call more than once.

Do not cooperate with the police in any way. Do not give any statements, samples, your clothes, or participate in any identification procedure without my permission.

If you are released before I see you you must call my office immediately so we can set a time to meet and discuss your case.

Very truly yours,


James P. Rogers
Public Defender

/ms

STATE OF SOUTH CAROLINA

County of Richland

Mr. Eddie L. Hall, #184752

Petitioner,

vs,

State of South Carolina
Attorney General, Warden
Cecilia R. Reynolds, of Kershaw
C.I., Director, Mr. William R.
Byars, Jr.

Respondents.

IN THE COURT OF COMMON PLEAS

Case No: 2013-CP-400-2591

Summons And Petition of
Writ of State Habeas
Corpus From Kershaw
Correctional Institution.

Certification of Service

The undersigned hereby certifies that a copy of
Summons And Petition of Writ of State Habeas
Corpus the initial Petitioner And designation of
matter in this case, has been served upon
Warden Cecilia R. Reynold of Kershaw C. I. and
Director Mr. William R. Byars, Jr. by mailing a
copy through Kershaw C. I. mail room.

Subscribed And Sworn To

Before Me This 7 Day of June 2013

Catherine A. Amos

Notary Public

My Commission Expires _____

My Commission Expires December 22, 2018

Respectfully Submitted

Eddie L. Hall

Mr. Eddie L. Hall, Christian Jew
Kershaw C.I. Palmetto BR. 33 #184752
4848 Goldmine Highway
Kershaw S. C. 29067

MAY 31 2013



Richland County Sheriff's Department

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered:	05/30/2013
File Number:	C201305363
DSS Number:	0
Foreign Case #:	
Court Date:	01/01/1900

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

Date _____

Plaintiff

Eddie L. Hall, #184752 Kershaw C.I. 4848 Goldmine Highway Kershaw, SC 29067
Phone: Work:

Defendant(s)

Attorney Generals Office 1000 Assembly St. Columbia, SC 29201
Phone: Work:

PERSONALLY APPEARED Before Me P. Wilkes, duty sworn says that he/she served, or attempted to serve, the following civil paper(s):

Summons & Complaint 1

on the defendant, Attorney Generals Office, as follows:

() By personally handing the process to the defendant at _____, SC
(Street) (City)
on _____
(Date/Time)

() By handing the process to _____ at _____
(Name of Person Served/Relationship) (Street)
_____, SC on _____, a person of suitable age and discretion then residing in
(City) (Date/Time)
the defendant's usual place of abode.

(x) By handing the process to Callie Alexander (the registered corporate agent) or officer of the company at
1000 Assembly St. Columbia, SC on 06/05/13 9:46 A/m and leaving him/her a copy.
(Street) (City) (Date/Time)

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address.
THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS: _____

Deponent knows the person served to be the defendant and Deponent is not a party to the action.
SWORN TO Before me this

5 day of June 2013
Kenneth Coleman

P. Wilkes
Deputy Sheriff, Richland County S#1195

NOTARY PUBLIC FOR SOUTH CAROLINA Expires August 11, 2014
MY COMMISSION EXPIRES
P.O. Box 143 Columbia, SC 29202
Office: (803) 576-3151 Fax: (803) 576-1898

STATE OF SOUTH CAROLINA County of Richland Mr. Eddie L. Hall, #184752 Petitioner, vs, State of South Carolina, Attorney General, Respondent.	IN THE COURT OF COMMON PLEAS A/No: 2013-CP-400-2591 Default For Relief Demanded In This Petition
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Grace Time

April 29, 2013, Notice was serve on Attorney General, Summons and Complaint by Richland County Clerk of Court.

Attorney General failure to answer or appear in Court.

Specified Time

May 3, 2013, Summons and Complaint was serve upon Attorney General by Kershaw mail room from Petitioner. (20) days.

Attorney General failure to answer or appear in Court.

Mandatory Time

Sheriff Department June 5, 2013 at 9:46 A.M.,
serve Attorney General with a Summons and
Complaint.

Attorney General failure to answer or appear
in Court.

Argument

Rule 8, General Rules of Pleading, Section (3), a
prayer or demand for judgment for the relief to
which he deems himself entitled.

Summons and Complaint is a written notification
that one is required to appear in Court, in which
a document in a civil action that is issued by
an authorized judicial officer (as a clerk of
Court) and delivered to a plaintiff or plaintiff's
attorney for service on defendant and that
notifies the defendant that Attorney General
must appear and defend, (as by filing an
answer) within a specified time or a default
judgment will be rendered for the plaintiff.

Rules of Civil Procedure, Rule 4, Section (B),

The Summons shall be signed by the plaintiff or
his Attorney,

Contain the name of the State and County, the name of the Court, the file number of the action, and the names of the parties, which is Attorney General, be directed to the Attorney General. State the name and address of the plaintiff or plaintiff's attorney, (if any) otherwise the plaintiff's address, and the time within which these rules require the defendant to appear and defend, and shall notify him that in case of Attorney General failure to do so judgment by default will be rendered against Attorney General for the relief demanded in the Complaint.

A person to whom a mandate is given.

Rule (12) of Rules of Civil Procedure, Section (A), A defendant shall serve his answer within (30) days after the service of the Complaint upon him, unless the Court directs otherwise when service of process is made pursuant to rule (E).

Conclusion

The Court in which, by the Constitution and

Statutes of this State, original jurisdiction in habeas Corpus is vested, may entertain in accordance with its rules a proceeding under this chapter in the exercise of its original jurisdiction and in that event this chapter, to the extent applicable, governs the proceeding.

The initial pleading that states a action civil and that sets forth the allegations made by the plaintiff against defendant and the plaintiff's demand for relief.

Charges Reverse, Conviction Over Turn,
Conviction Sit Aside, Release From Prison
Custody.

Copies To,

Administrative Judge,
Clerk of Court

Page 4.

Respectfully Submitted
Eddie L. Hall

Mr. Eddie L. Hall, Christian Jew
Kershaw C. I. Palmetto B. R. 33 B. #184752
4848 Goldmine Highway
Kershaw S. C. 29067

Sworn or Affirmed To And
Subscribed Before Me This

10 Day of July 2013

Cathrine A. Amos

Notary Public

My Commission Expires _____

My Commission Expires December 22, 2018

Kershaw CI
Kershaw
P533

FINANCIAL CERTIFICATE
FOR THE
DISTRICT OF SOUTH CAROLINA

(for use in § 1983, Bivens, and non-habeas civil actions filed by prisoners)

I request that an authorized officer of the institution in which I am confined, or other person designated to review financial information in relation to inmate trust funds, complete this Certificate. If I have insufficient funds in my account that prohibit me from paying the full filing fee required by 28 U.S.C. § 1914, I will send with my complaint an initial installment payment, required by 28 U.S.C. § 1915, equal to the amount calculated and entered on line four by the authorized officer signing this form.

Mr. Eddie L. Hall
INMATE NAME (PRINTED)

184752
INMATE (PRISONER) NUMBER

Eddie L. Hall
INMATE SIGNATURE

Kershaw C.I.
PLACE OF CONFINEMENT

- ◆ (1) Average monthly deposits to the inmate's account.....\$ 0
- ◆ (2) Average monthly balance in the inmate's account calculated for the prior six months period.\$ 0-11
- ◆ (3) Current Balance\$ 0-11
- ◆ (4) Initial Installment Payment (Take 20 percent of the greater of lines 1 or 2).....\$ 0

RECEIVED
NOV 22 2013
KerCI
MAILROOM

I hereby certify that as of this date, the above financial information is accurate for the above named inmate.

[Signature]
Authorized Officer's Signature

11/20/13
Date

J. Smit for Auth
Authorized Officer's Name and Title