

THE SOUTH CAROLINA COURT OF APPEALS

MOTION FOR APPOINTMENT OF COUNSEL

Appellate Case No. 2013 - 2447

James Anthony Primus 252315 Appellate

V.

SOUTH CAROLINA DEPARTMENT Respondent
OF CORRECTIONS
RESPONDENT

PROOF OF SERVICE

I James Anthony Primus hereby certify under penalty of perjury that a true and correct copy of the MOTION FOR APPOINTMENT OF COUNSEL has been provided to the below listed parties by placing said motion in a postage-paid envelope and mailing said envelope via United States mail this 19th day of December 2013 all of the parties who must receive copies of the document

Date December 19 2013

S.C. Court of Appeals

P.O. Box 11629

Columbia S.C. 29211

Mr. James A. Stuckey

Ms. Alissa R. Collins

123 Meeting Street

Charleston S.C. 29401

By James Anthony Primus 252315

James Anthony Primus Pro Se

MacDougall Correctional Inst.

Magnolia Unit 2 DSA

1516 Old Gilliard Road

Ridgeville S.C. 29472

James Anthony Primus 252315
MacDougall Correctional Inst.
Magnolia unit 2 DSA
1516 Old Gilliard Road
Ridgeville S.C. 29472

December 19 2013

RECEIVED
DEC 27 2013
SC Court of Appeals

S.C. Court of Appeals

V. Claire Allen

P.O. Box 11629

Columbia S.C. 29211

RE: James Anthony Primus v. S.C. Dept. of Corr.
Appellate Case NO 2013 - 2447

Dear Honorable Clerk

Please find enclosed Appellate James Anthony Primus
Proof of Service for the following motions

- 1 Motion to Proceed Informa - Pauperis
- 2 motion for appointment of counsel

please file in your office I would like to Thank
you in advanced

Sincerely

James Anthony Primus

cc MR. James A. Stuckey ESQ
MS. Alisha Robyn Collins ESQ

THE SOUTH CAROLINA COURT OF APPEALS

MOTION TO PROCEED IN FORMA PAUPERIS

AFFIDAVIT IN SUPPORT

Appellate Case NO. 2013 002447

James Anthony Primus 252315 Appellate

v.

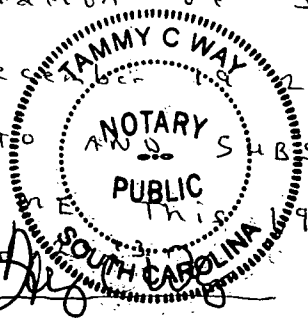
South Carolina Department of Corrections Respondent

Respondent

Now comes James Anthony Primus Pro. Se. Hereby certify under penalty of perjury that the information given in this above affidavit is true and correct
Submits as follows

- 1 That due to my Incarceration that I am unable to pay the costs of filing and service
- 2 I proceed in this action in good faith with profound belief that the issues are meritorious and that I am entitled to relief
- 3 I respectfully submit that if this honorable court should deny this motion that such would defeat the fair administration of justice

DATE DEPOSED December 19 2013
 SWORN TO AND SUBSCRIBED
 BEFORE ME this day of
 December 19
 Notary [Signature]
 My Commission Expires March 9, 2014



By James A. Primus
 James Anthony Primus 252315
 MacDougal Correctional Inst.
 Magnolia Unit 2 DSA
 1516 Old Gilliard Road
 Ridgeville, S.C. 29472

RECEIVED

INMATE TRUST FUND ACCOUNT REPORT
for SOUTH CAROLINA COURT FILING FEES

RECEIVED

SEP 17 2013

OCT 11 2013

MacDougall Corr. Inst. Mailroom
INSTRUCTIONS TO INMATE: Complete top portion then give to your mailroom. *MacDougall Corr. Inst. Mailroom*
Returned from Accounting, you must mail this form with any payment to the Court. *MacDougall*

By signing my name below, I am asking the Financial Accounting Office of the South Carolina Department of Corrections to complete this report. In accordance with SC Code of Laws §24-27-100 and 150, I authorize payment of the full filing fee. If I have insufficient funds in my account at this time to pay the court's full filing fee, I authorize SCDC to deduct the initial and subsequent payments until payment is completed.

INMATE NAME (print): James A. Primus

SCDC # 257315 INMATE SIGNATURE: James A. Primus

I plan to file this action in the SC County of Richland

The section below is for SCDC - Financial Accounting Branch's use ONLY.

(1) Total deposits to inmate's account for preceding six months' period* \$ 241.50

(2) Twenty percent (20%) of line 1 \$ 48.30

(3) Account balance - current date \$ 9.12

(4) PAYMENT AMOUNT **
(lesser of line 2 or line 3)
Enclosed check # _____ \$ 0

\$9.00 Court restitution freeze

****NOTE to COURT:** If payment is for partial fee, Court must notify SCDC once case is accepted and filed. Send notice with case # and balance owed to address below. SCDC will NOT process any additional payments until notification is received from Court.

South Carolina Department of Corrections
Financial Accounting - Room 234
PO Box 21787
Columbia, SC 29221-1787

*Admission date is noted here if inmate incarcerated less than six months ____/____/____

[Signature] _____ 10/7/13 _____
Prepared by Financial Accounting Branch - SCDC Date file\scmst\prepared 797

THE SOUTH CAROLINA COURT OF APPEALS

MOTION TO PROCEED IN FORMA PAUPERIS

APPELLATE CASE NO. 2013 - 2447

James Anthony Primus 252315 Appellate

V

South Carolina Department of Respondent
Corrections

PROOF OF SERVICE

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DEC 27 2013

SC Court of Appeals

I James Anthony Primus hereby certify under penalty of Perjury that a true and correct copy of the IN FORMA PAUPERIS has been provided to the below listed Parties by placing said motion in a postage-paid envelope and mailing said envelope via UNITED STATES MAIL this 19th day of December 2013 all of the Parties who must receive copies of the document

S.C. Court of Appeals
P.O. Box 11629
Columbia S.C. 29211

Mr. James A. Stuckey
Ms. ALISSA N. COLLINS
123 Meeting Street
Charleston S.C. 29401

Date December 19 2013

James Anthony Primus 252315
James Anthony Primus Pro. Se
MacDougall Correctional Inst.
Magnolia Unit 2 DSA
1516 Old Gilliard Rd.
Ridgeville S.C. 29472

THE SOUTH CAROLINA COURT OF APPEALS

MOTION FOR APPOINTMENT OF COUNSEL

Appellate Case No. 2013 - 2447

James Anthony Primus 252315 Appellate

V.

SOUTH CAROLINA DEPARTMENT Respondent
OF CORRECTION
RESPONDENT

Pursuant to 28 S.C. 1915 (c) and pursuant to 3 (c) S.C.R.C.P. The welfare of Appellate moves for an order appointing counsel to represent him in this case. In support of this motion Appellate states

1 Appellate is unable to afford counsel. He has requested leave to proceed In Forma Pauperis

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.

3 A trial in this case will likely involve conflicting testimony and counsel would better enable Appellant to present evidence and cross examine witnesses.

WHEREFORE Appellate Request that the Court Appoint a And Appellate lawyer a member of The South Carolina Bar as counsel in this case.

DATE December 19 2013

By James Anthony Primus 252315
James Anthony Primus Pro Se
1516 Old Gilliard Road
Ridgeville S.C. 29472

James Anthony Primm 252315
MacDougall Correctional Institution
Magnolia Unit 2 05A
1516 Old Gilliard Road
Ridgelyville S.C. 29472

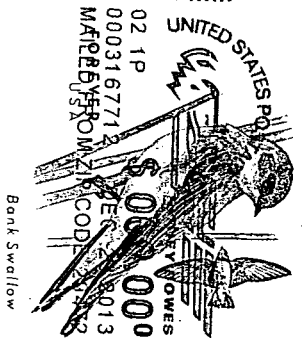
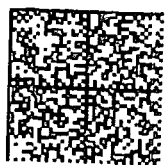
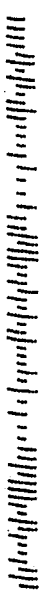
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DEC 27 2013

SC Court of Appeals

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

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The Department of Corrections has not censored this item, therefore, the Department does not assume responsibility for its written contents - MacDougal Correctional Institution.



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