

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY

D. CRAIG BROWN, CIRCUIT COURT JUDGE

THE STATE

RESPONDENT,

v.

CLIFFORD CLAUDE CAMPBELL

APPELLANT

APPELLANT CASE NO: 2013-001450

MOTION FOR ENLARGEMENT OF TIME

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APR 14 2014

**SC Court of Appeals**

THE UNDERSIGNED RESPECTFULLY SHOWS THE COURT:

1) APPELLANT'S COUNSEL FILED AN ANSWER'S BRIEF, STATING APPELLANT'S APPEAL IS WITHOUT MERIT, AND THEREFORE, HAS PETITIONED THE COURT TO BE RELIEVED AS COUNSEL.

2) APPELLANT RESPECTFULLY DISAGREES WITH APPELLANT DEFENDER'S OPINION ON THIS, AND ARGUES THERE ARE SEVERAL LEGAL ISSUES THAT HAVE MERIT IN THIS CASE, AND WISHES TO FILE AN APPELLANT'S PRO SE BRIEF ON THEM.

3) TO SHOW THE COURT JUSTIFICATION FOR ENLARGEMENT OF TIME IN WHICH TO DO THIS, THESE ARE A LIST OF ISSUES THAT IS INTENDED FOR ARGUMENT: A) FOURTH AMENDMENT VIOLATION FOR UNLAWFUL SEIZURE OF PERSON AND EVIDENCE THAT WAS IMPROPERLY

ADMITTED, AND HELD FOR APPROXIMATELY A YEAR BEFORE STATE OBTAINED A PROPER SEARCH WARRANT. B.) UNCONSTITUTIONAL RACE DISCRIMINATORY TESTIMONY. C.) IMPROPERLY ADMITTED TESTIMONY UNDER RULES OF EVIDENCE, RULE 404 (B) AND DENIAL OF DIRECTED VERDICT, WHEN THE COURT ITSELF, POINTED OUT THIS TESTIMONY WAS IN DIRECT CONTRADICTION (PERJURY) WITH DEBRIEFING STATEMENT GIVEN IN LENIENCY/COOPERATION AGREEMENT WITH S.L.E.D. D.) DENIAL OF NEW TRIAL MOTION, IN RECOGNITION OF THE TOTALITY OF THESE CIRCUMSTANCES VIOLATING APPELLANT'S DUE PROCESS RIGHTS TO A FAIR AND IMPARTIAL TRIAL.

4.) AFTER SPEAKING WITH APPELLANT DEFENDER ON THESE ISSUES AND EXPLAINING THESE ISSUES APPELLANT WISHED TO ARGUE, AND THEN FURTHER EXPLAINING THE LIMITATIONS AND THE INADEQUACIES OF THE LAW LIBRARY HERE AT TURBEVILLE CORRECTIONAL INSTITUTION, APPELLANT DEFENDER AGREED TO RESEARCH SOME APPROPRIATE CASE LAW AND THEN FORWARD THEM TO APPELLANT.

5.) DUE TO THIS INSTITUTION HOUSING YOUTHFUL OFFENDERS AND STRAIGHT TIMERS NOT BEING ALLOWED TO INTERACT WITH THEM AT ALL! IT IS OFTEN DIFFICULT, EVEN WITH AN ESTABLISHED COURT DEADLINE, TO OBTAIN MORE THAN ONE (1) OR TWO (2) DAYS PER WEEK FOR ACCESS TO THE LAW LIBRARY, NOT INCLUDING WHEN THE INSTITUTION IS PUT IN LOCKDOWN STATUS. WE MAY ONLY PUT IN FOR ONE (1) DAY AT A TIME (SEE ATTACHMENT) MEANING THAT ALTHOUGH APPELLANT IS REQUESTING AN ADDITIONAL SIXTY (60) DAY EXTENSION, IN REALITY IT WILL ONLY BE AT MOST, AN ACTUAL THIRTY (30) DAYS AVAILABLE FOR EIGHT (8) HOUR ACCESS TO THE LAW LIBRARY FOR APPELLANT.

6.) AS APPELLANT IS FILING HIS BRIEF PROSE, IT WILL TAKE THE REQUESTED AMOUNT OF TIME TO DECIDE WHICH ISSUES, IF NOT ALL, TO ARGUE, AND THEN TO BRING IT INTO PROPER FORM FOR PRESENTATION TO THE COURT.

IN CONCLUSION, APPELLANT PRAYS THIS COURT SEES THE JUSTIFICATION IN HIS REQUEST AND GRANTS HIS MOTION FOR ENLARGEMENT OF TIME OF SIXTY (60) DAYS, IN ADDITION TO THE FORTY-FIVE (45) DAYS ALREADY SET FORTH. IN ADDITION, APPELLANT RESPECTFULLY REQUESTS AN EXACT DATE FOR DEADLINE, SO THIS MAY BE SHOWN TO THE APPROPRIATE INSTITUTION OFFICIALS.

RESPECTFULLY SUBMITTED,

S/ *Campbell*

CLIFFORD CLAUDE CAMPBELL # 355876

TURBEVILLE CORP. INST. SB-297

P.O. Box 252

TURBEVILLE, SC 29162

PROSE APPELLANT

SWORN to and subscribed before me this  
9th day of April 2014.  
*Emilie Stoye* (L.S.)  
Notary Public for South Carolina

My Commission Expires: 4-27-2016

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To: Mr Gilman Law Library

DATE: 4-2-14

From: ~~Clifford Campbell~~ LEGAL


SCDC # 355870

Inst: Turbeville

living Quart: SB 297

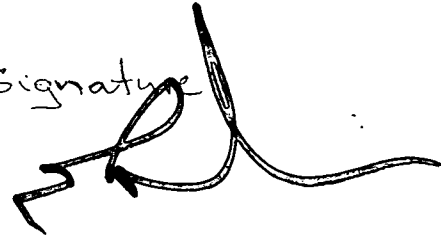
I would like all day Access To the Law library on Fri 4-4-10 concerning new Court Deadlines

Report 4-4-10

7:00  
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT PRO SE APPELLANT SERVED THE COURT WITH THIS MOTION FOR ENLARGEMENT OF TIME BY DEPOSITING THE ORIGINAL IN THE U.S. MAIL, POSTAGE PRE-PAID, VIA TURBEVILLE CORRECTIONAL INSTITUTION MAILROOM

S/ *Campbell*  
CLIFFORD CLAUDE CAMPBELL # 355870

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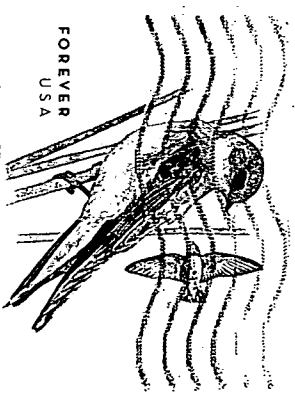
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SOUTH CAROLINA COURT OF APPEALS  
JENNY ABBOTT KITCHINGS, CLERK  
P.O. Box 11629  
COLUMBIA, SC. 29211

LEGAL DOCUMENTS

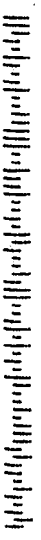


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