

IN THE COURT OF APPEALS
STATE OF SOUTH CAROLINA

RECEIVED

MAY 28 2014

SC Court of Appeals

ROBERT KOON

v.

SCDPPPS

2014-000803

MOTION TO APPOINT COUNSEL

THE APPELLANT WOULD RESPECTFULLY MOVE THIS COURT TO APPOINT COUNSEL ON THE ABOVE APPEAL AS HE DOES NOT HAVE THE RESOURCES OR THE ACUMEN TO FILE THE APPEAL. APPELLANT HAS CONTACTED OFFICE OF INDIGENT DEFENSE ROBERT PACHAK AND ASKED HIM TO REPRESENT APPELLANT - APPELLANT DOES NOT EVEN HAVE COPIES OF THE RECORD ON APPEAL AS THAT COSTS 108⁰⁰ FROM ALC NOR DOES HE HAVE COPIES OF THE BRIEFS (ETC) AS HE HAS NO FUNDS TO PAY FOR COPIES (ETC)

THIS IS A APPEAL THAT AFFECTS ALL LWOP PRISONERS BASED UPON JUDICIAL INTERPRETATION OF 17-25-45(C) WHICH HAS NEVER BEEN ADDRESSED IN THE SC COURTS PER HADGE v. RAINEY 533 S.E2d. 578, 581 (2000) AND STATE v. BLACKMON 403 S.E2d 660 (1990)

✓ (PENAL STATUTES MUST BE STRICTLY CONSTRUED AGAINST THE STATE)

COUNSEL CAN OBTAIN R.O.A FROM ALC
AND THE BRIEFS AND HAVE SCOPPS PROVIDE
THE "FILE" IN WHICH SET FORTH "EXTRAORDINARY
CIRCUMSTANCES" THAT WAS SUBJECT OF THE MOTION
TO EXPAND THE ROP IN ALC, SIMPLY PUT
APPELLANT DOES NOT HAVE FUNDS OR RESOURCES TO
DO SO.

PLEASE IN THE INTEREST OF JUSTICE IN THIS
IMPORTANT ISSUE AFFECTING LWOP PRISONERS
STATEWIDE APPOINT COUNSEL.

Respectfully

Reut Koon

PO BOX 205

RIDEEVILLE SC 29472

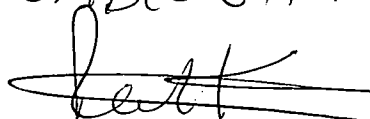
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PROOF OF SERVICE

A TRUE COPY WAS MAILED TO MATTHEW C. BUCCHIANI
SCOPPS PO BOX 50666 COLUMB.A SC 29210

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Respectfully
UNDER OATH

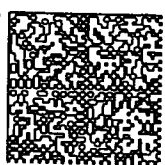


Robert Kowal 2226
CJ

PO Box 205
Ripesculle SC
29422

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SOUTH CAROLINA COURT
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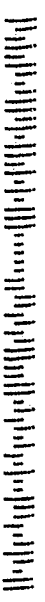
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SC Court of Appeals

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