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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
L. Casey Manning, Circuit Court Judge

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SEP 02 2014

SC Court of Appeals

Case No. 2011-CP-40-07134  
Appellant Case No. 2012-213441

Glenda R Couram, ..... Appellant,

v.

Lula N. Davis, Shirley Rivers, Constance "Connie" Rhett, Marcia Adams, Steven Walker, Tosha  
Autry, Dottie Blankenship and SC Department of Motor Vehicles in their individual and official  
capacities, ..... Respondents

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**MOTION FOR APPOINTMENT  
OF COUNSEL FOR REPRESENTATION  
DURING ORAL ARGUMENT**

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**COME NOW**, Glenda R. Couram, *pro se* Appellant pray for this honorable court to  
appoint counsel to represent her before this SC Appeals' Court request for oral argument.

I understand that the court may appoint counsel in some cases in the interest of justice but  
that there is no constitutional right to have counsel appointed to me in this action. I understand  
that the court will consider whether justice requires the appointment of counsel or permit me to  
continue this action *pro se*.

I understand that before the court will consider appointing counsel, I must contact the SC Lawyer Referral Services which has been done and an attorney spoken to providing direction and advice but declined to represent.

I, the above named Appellant, Glenda R. Couram, do hereby declare that I have tried to find an Attorney to represent me in this Court for the day(s) October 6, 7, 8 9, 14, 15 or 16, 2014 for oral argument. I have diligently tried to find an attorney<sup>1</sup> Mr. Dickey and Taylor were referrals from SC Lawyer Referral. Mr. Dickey wanted \$3500 just to appear for the argument, I countered but it was not enough and Mr. Taylor took my information but never called me back and he also said he had plenty of work. I also contacted Robert Hill of Robert Hill Laws Office located in Newberry, he declined and provided a referral, I discussed the case with his Assistant but he never called back. I earn a little too much for legal aid.

I also understand this request if granted will be for this court only.

**CASE LAW IN SUPPORT OF REQUEST FOR ATTORNEY APPOINTMENT:**

The Judicial Code, 28 U.S.C. Sec. 1915(d)/(e)(1), vests the court with discretion to appoint counsel for an "indigent" in a civil action. *Bowman v. White*, 388 F.2d 756 (4th Cir.), cert. denied, 393 U.S. 891, 89 S.Ct. 214, 21 L.Ed.2d 172 (1968). If the District Judge was proceeding under this erroneous view of the law, his judgment would be subject to reversal and remand. See *United States v. Williams*, 407 F.2d 940 (4th Cir. 1969); *United States v. Wilson*, 450 F.2d 495 (4th Cir.)

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<sup>1</sup> Joseph Dickey of Dickey Law Group, 1612 Marion Street, Columbia, SC 2920; George A. Taylor, Associate, Callison Tighe & Robinson, LLC., Palmetto Armory Office Building, 1812 Lincoln Street, Suite 200; Law Office of Robert Hill, PO Box 51 Newberry, SC 29108

**The Fourth Circuit** has held that a court should request counsel to represent an indigent plaintiff only after a showing of a particular need or exceptional circumstance. See Cook v. Bounds, 518 F.2d 779 (4th Cir. 1975).

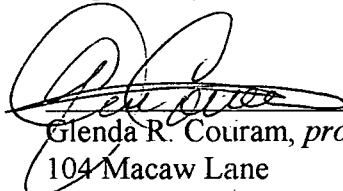
“The question of whether such circumstances exist in any particular case hinges on characteristics of the claim and the litigant.” Whisenant v. Yuam, 739 F.2d 160, 163 (4th Cir. 1984). However, “[i]f it is apparent to the district court that a pro se litigant has a **colorable claim** but lacks the capacity to present it, the district court should appoint counsel to assist him.” Id.

Note: while the plaintiff is able to research and submit document so the court she is lacking in presenting in a court room setting that will provide the best representation

*(Colorable Claim - A plausible legal claim: In other words, a claim strong enough to have a reasonable chance of being valid if the legal basis is generally correct and the facts can be proven in court. The claim need not actually result in a win).*

Dated this 23<sup>rd</sup> day of July 2014

Respectfully submitted by:



Glenda R. Couram, *pro se*  
104 Macaw Lane  
Lexington, SC 29073  
803 896-7506  
grcouram@hotmail.com

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
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Case No. 2011-CP-40-07134  
Appellant Case No. 2012-213441

Glenda Couram..... Appellant,

v.

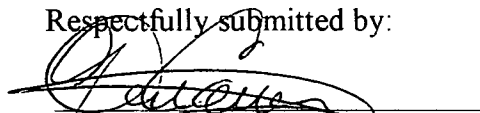
Lula N. Davis, Shirley Rivers, Constance "Connie" Rhett, Marcia Adams, Dottie Blankenship,  
Tosha Autry, Steven W. Lake and SC Department of Motor Vehicles in their official and  
individual capacities ..... Respondent

**CERTIFICATE OF SERVICE**

I, the undersigned hereby certify that I have served a copy of a *Request for Appointment of Counsel*, by causing a copy of the same to be personally deposited in a U.S. Postal Service mail box, first class postage prepaid on the South Carolina Appeals Court and a copy of same mailed to Respondents at return address clearly visible as shown below this 23<sup>rd</sup> day of July 2014.

Eugene H. Matthews, Esq.  
Richardson Plowden, Attorneys at Law  
1900 Barnwell Street  
Columbia, South Carolina 29201

Respectfully submitted by:



Glenda R. Couram, *pro se*  
104 Macaw Lane  
Lexington, SC 29073  
803 896-7506  
grcouram@hotmail.com

August 28, 2014

V. Clare Allen  
Deputy Clerk  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29201

**RE: Glenda Couram v Lula Davis, Shirley Rivers, Constance "Connie" Rhett, Marcia Adams, Dottie Blankenship, Tosha Autry and Steven Walker, SC Department of Motor Vehicles, in their official and individual capacities.**  
**Appellate Case No.: 2012-213441 Lower Court Case No.: 2011CP4007134**

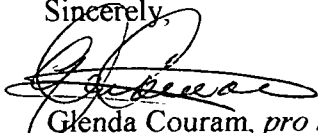
Dear Ms. Allen:

I am writing this per instructions of Elizabeth regarding a Motion filed on or about July 23, 2014, requesting Appointment of an Attorney to represent me in the Court of Appeals during the Oral Argument phase set before this court on October 7, 2014 at 10 am.

The receipt number for the check is #72990. I have enclosed a copy from the bank. It is important that the Court respond to the request as the date for the Oral Argument, as you know, has been set for October 7, 2014. I understand if the request is denied I will have to represent myself.

Also, please find enclosed the Acknowledgement of the date and time for the Oral Arguments.

Sincerely,

  
Glenda Couram, *pro se*  
104 Macaw Ln  
Lexington, SC 29073  
803 896-7509

/grc

Enclosures

**LETTER ONLY**  
c: Eugene H. Matthews, Esquire  
1900 Barnwell Street  
Columbia, SC 29201

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**SC Court of Appeals**

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REVENUE

STATE OF  
MISSISSIPPI



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67-796-532

GLENDA R. COURAM 2718  
 SC DL 003814017 PH 803 398 0127  
 104 MAC AVE LN  
 LEXINGTON, SC 29023

DATE 7/25/14

PAY TO THE ORDER OF SC Appeals Court \$ 25.00  
Twenty-five no/100 DOLLARS

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 A DIVISION OF WELLS FARGO BANK, N.A.

fee Glenda Couram

⑆053207766⑆1010026488239⑆ 2718 72990

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 • Signature must be legible and clearly identifiable.  
 • Signature must be written on the signature line.  
 • Signature must be written in the presence of the cashier or teller.  
 • Signature must be written on the front of the instrument.

System Features:  
 • The instrument must be presented to the cashier or teller for signature.  
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 Batch: 362327  
 Date: 07/25/14

Seq: 00136 07/25/14  
 BAT: 352127 CC: 9257079099  
 WT: 0F LTPS: Atlanta ET  
 BC: Tower BC SC3-230

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July 23, 2014

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Jenny Abbott Kitchings  
Clerk of Court  
1015 Sumter Street  
Columbia, South Carolina 29201


**RE:** Glenda R Couram v Lula N. Davis, Shirley Rivers, Constance "Connie" Rhett, Marcia Adams, Steven Walker, Tosha Autry, Dottie Blankenship and SC Department of Motor Vehicles in their individual and official capacities

**C/N:** Appellant Case No. 2012-213441

Dear Ms. Kitchings:

Please find my Motion for Appointment of Counsel along with the \$25.00 fee to file the Motion.

Respectfully submitted by:



---

Glenda R. Couram, *pro se*  
PRO SE APPELLANT  
104 Macaw Lane  
Lexington, SC 29073  
803 896-7506  
grcouram@hotmail.com

/grc  
enclosure

c: Eugene H. Matthews, Esq.  
Richardson Plowden, Attorneys at Law  
1900 Barnwell Street  
Columbia, South Carolina 29201

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Blenda Couram  
104 Macaw hrd  
Lexington, SC 29073

Attn: Elizabeth

COLUMBIA SC 290

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