

PLEASE RETURN COPY OF EACH FIRST PAGE BACK TO MACON

ALSO PLEASE USE BRCI DATE STAMP

Date: 10.17.2014

COPY

RE: CASE NO. 2014 CP 400 2829

RE: SUMMONS COMPLAINT. PLEADINGS. MOTIONS ORDERS NOTICE OF INTENT TO SUE

CERTIFICATE OF SERVICE

I certify that on 10.17.2014, I served a copy of this Application on all parties, addressed as shown [list parties' names and the addresses at which they were served below]: AT AND THROUGH B.R.C.I. MAILROOM STAFF NAMED

BELOW: Signature: Mr. John Brown

SECRETARY OF DEPARTMENT OF CORRECTIONS

- NIKKI R. HALEY
CURTIS LOFTIS
RICHARD ECKSTORM
CHRISTOPHER FLORIN
BREAN P. STERLENG
ROBERT M. STEVENSON, III
SHARONNA SUTTON
MICHAEL STEPHAN
JESSICA EDMOND
ANDREW JEFFORD
PAUL D. MARRIOTT
LT. BOYD

RECEIVED APR 0 1 2015

RECEIVED OCT 3 1 2014 BRCI MAILROOM

SC Court of Appeals

- MR. COX
MS. MITCHELL
LT. REVERIA

CLASSIFICATION MACON DAVIS, Y. WESLEY
SHERMAN V. UNITED STATES, 356 U.S. 369, 374-75, 78 S.Ct. 819 2 L.Ed. 2d 848 (1958) ("Ignorance of Government's Agents' Actions Does NOT Relieve The Government of Responsibility For The Conduct of Its Agents, including the Above Named State Officers")
44 WOOD BROAD RIVER ROAD COLUMBIA SOUTH CAROLINA 29210

SWORN TO AND SUBSCRIBED BEFORE ME THIS 17th DAY OF October, 2014

NOTARY: Susan H. Zipp

EXPIRES: My Commission Expires

COPY

AUGUST 19 2014

Mr. John Bacaus
4400 Broad River Road
A R C E - WAT 117
Columbia S.C. 29210

RECEIVED

AUG 19 2014

SEP 03 2014

BRG
MAILROOM

BRG
MAILROOM

Attorney General's Office
Dennis Bldg. Box 11544
Columbia S.C. 29211

Court of Common Pleas, Clerk, Tranette McBride
1701 Main Street
Columbia S.C. 29201

Dear Clerk of Courts:

PLEASE clock-in stamp, file and return a copy for
petitioners Mr. Bacaus files, an order to show cause
for an preliminary injunction and temporary
restraining order to compel defendants to
provide the appropriate accommodations POSTAGE
for sending receiving or delivery of prisoners
petitioner Mr. Bacaus institutionalized correspondence
and/or court ordered particularized needs
to access the courts and other corresponding with
him.

Thank you for your time and professionalism.

AUGUST 19, 2014

REEBLANN COUNTY

Respectfully Submitted
LSC
Mr. John Bacaus

1 of 11

OF 24

24-0249

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Division of Inmate Services

AGREEMENT TO DEBIT E.H. COOPER ACCOUNT

Inmate's Name: MR. BACCUS	SCDC #: 18789	Housing Unit: WAF 117	Date: 8-19-2014
-------------------------------------	-------------------------	---------------------------------	---------------------------

GENERAL MATERIAL

** Inmate must have the funds in his/her account to pay for the materials.

To be completed by
SCDC staff:

Item	Amount	Cost
Envelope		
Pen		
Paper		
Postage		
Tape		
Box		
Electronic Repair		
Other		
Sub-Total:		

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only - No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICE RECEIVED

Postage \$ **1.40**
 Certified Fee **3.30**
 Return Receipt Fee (Endorsement Required)
 Restricted Delivery Fee (Endorsement Required)
 Total Postage & Fees \$ **4.70**

Postmark Here
BRC MAILROOM
8.19.2014

Sent to: **ATTORNEY GENERAL OFFICE**
 1154 Bldg. Box 1154
 Columbia SC 29211

Sub-Total:

LEGAL MATERIAL

** Inmate is not required to have the funds in his/her account to pay for the materials; however, his/her account must be debited for all materials s/he elects to receive.

To be completed by
SCDC staff:

Item	Amount	Cost
Envelope	4.70	
Pen	1.40	
Paper		
Postage (2)	6.10	6.10
Other		
Sub-Total:		6.10

Heats

Certified Mail Gen. Off.

Pl. of Comm.

pleas

PHOTOCOPIES

** Inmate may be required to have funds in his/her account. See SCDC Procedure GA-01.03(OP), "Inmate Access to the Courts," to determine if inmate may receive copies with/without funds.

To be completed by
SCDC staff:

Item	Amount	Cost
Photocopies (28)	7.00	7.00

[Handwritten Signature]

Inmate Signature

[Handwritten Signature]

Mailroom/Canteen Signature (Request filled by)

8-19-14

Date

~~7.00~~

TOTAL 13.10

White - Inmate

6

Canary - Mailroom/Canteen Employee

SCDC Form 10-14 (November 1998)

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF
COMMON PLEAS

AUG 19 2014

JOHN BACCUS

PETITIONER,

vs.

SUMMONS

BRG
MAILROOM

NIKKI R. HALEY GOV. OF S.C.
RICHARD ECKSTROM CONTROLLER
GENERAL OF S.C.
CURTIS LOFTIS TREASURER OF
S.C.

(ORDER TO SHOW CAUSE FOR
AN PRELIMINARY INJUNCTION
AND TEMPORARY RESTRAINING
ORDER - - -)

BRIAN P. STERLING DIRECTOR
OF S.C. D.O.C.

CASE NO. _____

ROBERT M. STEVENSON III WARDEN
OF S.C. D.O.C. BR CI

SHARONNA SUTTON, AIW OF
S.C. D.O.C. BR CI.

MICHAEL STEPHAN, AIW OF S.C.
D.O.C. BR CI.

CHRISTOPHER FLDREN GENERAL
COUNSEL OF S.C. D.O.C.

ANDREW JEFF COAT MAILROOM
CLERK OF BR CI.

JOHN ANN JANE NOEL

DEFENDANTS.

RICHLAND COUNTY
FILED
2014 SEP -5 AM 12:56
JEANNETTE W. MCBRIDE
C.C.P. & G.S.

TO THE ABOVE-NAMED DEFENDANTS:

You are hereby summoned and required to serve upon
petitioner, whose address is MR. JOHN BACCUS 4460
BROAD RIVER ROAD, BR CI-WAT 117, COLUMBIA SOUTH
CAROLINA 29210, an answer to the complaint which is
herewith served upon you within 20 days after service
of this summons upon you exclusive of the day
of service, or 30 days if the U.S. Government
or officer/agent thereof is a defendant. If you
fail to do so, judgment by default will be taken
against you for the relief demanded in the complaint.

CLERK OF THE COURT
DATE: _____

2 of 11
12 OF 24

30-0449

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF
COMMON PLEAS

EIVE
AUG 19 2014
BRG
MAILROOM

JOHN BACCUS
PETITIONER,

CASE NO. _____

vs.

ORDER TO SHOW CAUSE FOR AN
PRELIMINARY INJUNCTION AND
TEMPORARY RESTRAINING
ORDER TO COMPEL THE
DEFENDANTS TO UTILIZE
THE APPROPRIATED ACCOMMO-
DATIONS REMEDIES STAFF
TRAINING AND FOR COVERED
SERVICES FOR THE SENDING,
RECEIVING, OR DELIVERY OF
BLACK IIMS MR. BACCUS' INSTI-
TUTIONALIZED CORRESPONDENCE,
OR COURT ORDERED PARTICI-
PATION IN THE COURTS AND
CORRESPONDING WITH HIS
COMMUNITY.

NIEKKI A. HALEY GOV. OF S.C.
RICHARD ECKSTROM CONTROLLER
GENERAL OF S.C.
CURTIS LOFTER, TREASURER
OF S.C.

BRIAN P. STERLING DIRECTOR
OF S.C. D.O.C.

CHRISTOPHER FLORIN GEN.
COUNSELS OF S.C. D.O.C.

ROBERT M. STEVENSON III WARDEN
OF S.C. D.O.C. BRG

SHARONDA SUTTON AIW OF
S.C. D.O.C. BRG

MICHAEL STEPHAN AIW OF
S.C. D.O.C. BRG

ANAREN JEDCOAT MAIL-
ROOM CLERK OF BRG

JOHN AND JANE ODES

DEFENDANTS.

(COMPLAINT)

AM 12:55
BRG
MAILROOM

I ASK THIS COURT TO ISSUE AN ORDER TO SHOW CAUSE
FOR AN PRELIMINARY INJUNCTION AND TEMPORARY
RESTRAINING ORDER BECAUSE;

1. This is the county where this case should be
handled; since

(a) The persons / defendants who caused the DEEP-
SEATED RETALIATORY TORTIOUS NEGLIGENCE
[DISCRIMINATION] lives / works in this county.

3-OF-11
13 OF 24
31-OF-49

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF
COMMON PLEAS

RECEIVED
SEP 03 2014
BRC
MAILROOM

JOHN BALLEUS
PETITIONER

CASE NO. 2014 CP4002829

VS.

PROOF OF SERVICE

NEKKE R. HALEY GOV. OF S.C.
RICHARD ECKSTROM CONTROLLER
GENERAL OF S.C.
CURTIS LOFTES TREASURER
OF S.C.
CHRISTOPHER FLOREN GENERAL
COUNSEL FOR S.C. D.D.C.
BRYAN P. STERLING DIRECTOR
OF S.C. D.D.C.
ROBERT M. STEVENSON III WARREN
OF S.C. D.D.C. BRC
SHARONNA SUTTON A/W OF
D.D.C. BRC
MICHAEL STEPHAN A/W OF
D.D.C. BRC
ANDREW JEFF COAT MAILROOM
CLERK OF BRC
JOHN AND JANE DOES

RICHLAND COUNTY
FILED
2014 SEP -5 PM 12:01
JEANETTE W. MCBRIDE
C.C.P. & G.S.

RESPONDENTS

PROOF OF SERVICE

I, Mr. John Ballus, Petitioner States Under The Penalty Of Perjury That On September 3rd 2014 He Mailed A Copy Of The PROOF OF SERVICE evidencing service of The COVER LETTER SUMMONS, COMPLAINT, GROUNDS, PRAYER FOR RELIEF, VERIFICATION, TAKE JUDICIAL NOTICE I/M PROPERTY INVENTORY, CERTIFICATE OF SERVICE, U.S. POSTAL SERVICE CERTIFIED RECEIPT, S.C. DEBIT FORM 10-14, MOTION FOR JURY TRIAL, ORDER OF APPOINTMENT OF LEGAL COUNSEL FOR INDECENT PETITIONER, REPORTER THERE TO, ORDER FOR HEARING OR SUMMARY JUDGMENT, based Upon The materials in supports... by placing them in an envelope and placed them in the LEGAL MAILROOM AT BRC STATE PRISON TO RESPONDENTS COUNSEL AND THE COURT OF COMMON PLEAS ADDRESS ABOVE.

3 OF 5

Mr. John Ballus
4400 Broad River Road
BRC - WMA 117
COLUMBIA S.C. 29210

Date: _____

CERTIFICATE OF SERVICE

C/N. 2014 CP 4002829

I certify that on AUGUST 2014, I served a copy of this Application on all parties, addressed as shown [list parties' names and the addresses at which they were served below]:

Signature: Mr John Boon

RICHLAND COUNTY COURT OF COMMON PLEAS
RICHLAND COUNTY JUDICIAL CENTER
1701 MAIN STREET
COLUMBIA S.C. 29201

~~ATTORNEY GENERAL OFFICE ALAN WILSON
NORTH BLDG. P.O. BOX 11599
COLUMBIA, S.C. 29220~~

HAS SWORN TO AND SUBSCRIBED TO BEFORE ME
THIS 2nd DAY OF September
NOTARY: Susan N. Zyle
EXP: _____

Commission Expires
March 5, 2018

2014 SEP -5 AM 2:57
JENNIFER W. MCBRIDE
N.C.P. & G.S.
RICHLAND COUNTY
FILED

CAPTION:

JOHN JACCUS v.
Petitioner

AFFIDAVIT OF SERVICE
PROOF OF SERVICE
CERTIFICATE OF SERVICE

Docket Number: 2014 CP 4002829

The State of South Carolina
Carolina ANKRE R. MALEY,
B. P. STEELING JOHN/DANE HOEL
Respondents.

I, John Jaccus, hereby certify under penalty of perjury that on
(name)

August 2014, I served a copy of REQUEST THAT THE ABOVE COURTS
RECEIVE AND RE-OPEN DISPOSITIONS OF THE PETITIONER, 8.14.2014 11 PAGE
SUMMONS - COMPLAINT AND CERTIFICATE OF PROOF OF AFFIDAVIT OF
SERVICE AND VERIFICATION AND HAVE BEEN FILED
(list all documents)

by (select all applicable):

- United States Mail
- Federal Express
- Overnight Mail
- Facsimile
- E-mail
- Hand delivery

on the following parties (complete all information and add additional pages as necessary):

Name	Address	City	State	Zip Code
RICHLAND COUNTY	COURT OF COMMON PLEAS, RICHLAND COUNTY			
JUDICIAL CENTER	1701 MAIN STREET - COLUMBIA	SC	29201	

Name	Address	City	State	Zip Code
ATTORNEY GENERAL OFFICE, MARK WELSON				
NEWELL BLDG.	Box 11549, Columbia	SC	29211	

Name	Address	City	State	Zip Code

August 2014
Today's Date

[Signature]
Signature

JEANNETTE W. MCBRIDE
C.C.P. & G.S.
2014 SEP -5 AM 2:57
FILED
RICHLAND COUNTY

Given To and Subscribed Before Me

on 2nd day of September, 2014 5 OF 50
Susan H. Dye

Notary Public For South Carolina

My Commission Expires
March 5, 2018

My Commission Expires:

JEANETTE W. McBRINE
CLERK OF COURT
RICHLAND COUNTY
P.O. BOX 2766
COLUMBIA, SOUTH CAROLINA 29202-2766
CASE NO. 2014 CP 400 282A

CONTENTS OF DOCUMENTS SUBMITTED TO THE ABOVE COURT 8.19.2014 AND
9.3.2014, IN THE ABOVE MATTER.

<u>PAGES</u>	
1 OF 50	COVER PAGE
2 OF 50	RICHLAND CO. COURT OF COMMON PLEAS AUGUST 20 2014
3 OF 50	PROOF OF SERVICE
4 OF 50	CERTIFICATE OF SERVICE SEPT. 2 2014 NOTARIZED
5 OF 50	" " "
6 OF 50	SCDC DEBIT FORM 10-14, 8.19.2014
7 OF 50	TAKE JUDICIAL NOTICE
8 OF 50	TR. P. 95
9 OF 50	TR. P. 96
10-13	OPINION NO. 26094 PAGES 10-13 LAW/ANALYSIS I. ARRESTS
14-17	TR. P. 191-193
18-19	THE STATE OF S.C. MARCH 19. 2003 OFFICE OF SOLICITOR
20	TAKE JUDICIAL NOTICE
21-27	POST-CONVICTION RELIEF APPLICATION
28	PARSONS OUVERSON STARK, GUEST AND NEIL PA OCT. 2. 2009
29	COVER LETTER 8.19.2014
30	SUMMONS
31-40	COMPLAINT AND CERTIFICATE OF SERVICE
41	MOTION FOR JURY TRIAL OF RIGHT SCR CIV. PRO. RULE 3b
42	ORDER FOR / OF APPOINTMENT OF LEGAL COUNSEL FOR INDIGENT PETITIONER
43-48	NOTICE OF APPOINTMENT FOR LEGAL COUNSEL AND LEGAL COUNSEL SOUGHT AFTER RESORTS LETTERS RESPONSES
49	2ND CHARGE INITIATIVE ENC. AUG. 29. 2014
50	SCDC WARRANT MONTHLY AGENDA ACKNOWLEDGING SCDC MAIL ROOM MISREPRESENTING DELAYS RECEIVING SENDING OR DELIVERY OF PRISONERS MAILS

ORIGINALS

Mr. John Bacall
4460 Broad River Road
B R C T WAT 117
Columbia, S.C. 29210

AUGUST 2014

RECEIVED

SEP 03 2014

**BRO
MAILROOM**

2014 SEP -5 PM 12:01
JEANETTE W. MCBRIDE
C.C.P. & G.S.

RICHLAND COUNTY
FILED

Richland County Court of Common Pleas
Richland County Judicial Center
1701 Main Street
Columbia, S.C. 29201

Attorney General's Office, Alan Wilson
Benin's Bldg Box 11549
Columbia, S.C. 29211

RE: REQUESTING THE ABOVE COURTS RECEIPTS AND DISPOSITIONS
OF THE PETITIONERS 8/4/2014, 11/PAGE SUMMONS, COMPLAINT, JURY
AND CERTIFICATE, OR PROOF, OR AFFIDAVIT OF SERVICES
AND VERIFICATION, AND HAD BEEN FILED

RE: 2014 CP 4002829, JOHN BACALL VS. NIKKI R. HALEY, B. P. STERLING
EDITH ANN JANE DOES

Dear Ms. J. W. McBride Clerk, Chief Administrative Judge Reviewing Officers;
AGAIN, FOR YOUR CONVENIENCES, PLEASE CHECK-IN STAMP
FILE AND RETURN, IN THE ENCLOSED S.A.S.E. ONE OF THE TWO
ENCLOSED COPIES OF PETITIONERS Mr. Bacall's RE-SUBMITTED B.R.C.T.
MAILROOM DATE STAMPED AUG. 19, 2014 RECEIVED FOR OUTGOING,
(SIGNED) U.S. POSTAL SERVICE CERTIFIED MAIL RECEIPT 11 PAGE
SUMMONS AND COMPLAINT GROUNDS, PRAYER FOR RELIEF, VERIFICATION,
CERTIFICATE OF SERVICE ALSO INCLUDED IS A (COMPLETED)
SCDC AGREEMENT TO DEBIT E.H. COOPER ACCT. FORM AND
ANOTHER COMPLETED CERTIFICATE, OR PROOF, OR AFFIDAVIT OF
SERVICE, FOR YOUR CONVENIENCES.

Thank you for your time.

AUGUST 2014

Respectfully Submitted

RICHLAND COUNTY, S.C.

/s/

Mr. John Bacall

TAKE JUDICIAL NOTICE: "OVERCOMING DEFECTS IN "NOTICE SERVICES"."
BY RELYING ON ITS "FUNCTIONAL EQUIVALENT" OR OTHER DOCUMENTS FILED.

IN THE COURT OF

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

JOHN BACCUS
PETITIONER,

VS.

DOCKET NO. 2014 CP4002829
ORDER OF APPOINTMENT
OF LEGAL COUNSEL
FOR INDIGENT PETITIONER

NIKKI R. HALEY, GOV. OF S.C.
RICHARD ECKSTROM, CONTROLLER
GENERAL OF S.C.

CURTIS LOFTIS, TREASURER OF
S.C.

BRIAN P. STERLING, DIRECTOR OF
S.C.

ROBERT M. STEVENSON, III, WARREN
OF S.C. A.D.C. B.R.C.I.

SHARHONDA SUTTON, A/W OF S.C.
D.O.C. B.R.C.I.

MICHAEL STEPHAN, A/W OF S.C.
D.O.C. B.R.C.I.

CHRISTOPHER FLORIN, GEN. COUN.
OF S.C. A.D.C.

ANDREW JEFFCOAT, MAIL ROOM
CLERK OF S.C. A.D.C. B.R.C.I.

JOHN AND JAKE DOES

DEFENDANTS.

The Petitioner, Mr. JOHN BACCUS contends that He is
Indigent and in need of services of An Attorney as
contemplated by Law. THEREFORE, _____,

Attorney-at-Law, is Appointed as Counsel, For The
Petitioner.

THIS _____ DAY OF _____ 20____ AT _____ (11am-1pm)

CLERK OF _____

STATE OF SOUTH CAROLINA

COUNTY OF

JOHN BALLUS

PETITIONER,

v.

STATE OF SOUTH CAROLINA
NEKKE R. HALEY, RECHARD ELKSTROM,
CURTIS LOFTIS, BRIAN P. STIRLING,
ROBERT M. STEVENSON III, SHARHONIA
SUTTON, MICHAEL STEPHAN,
CHRISTOPHER FLORIN ANDREW
JEFFREY JOHN AND JANE NOEL

DEFENDANTS,

IN THE COURT OF

JUDICIAL
CIRCUIT

NOTICE OF APPOINTMENT
FOR LEGAL COUNSEL

CASE NO. 2014 CP 4002829

TO:

Anne Marie Ugarte
USC Law School, Clin-
ics Department
701 S. Main Street
Columbia, South Car-
olina 29208
PHONE: (803) 777-
8805
FAX: (803) 883-3401

ATTORNEY AT LAW

By Order of The Judge And
Pursuant to Rule 60B, SCAR you are hereby
Appointed to act as Attorney for

THE PETITIONER, in this action, who is indigent,

THIS DAY OF

20

JUDGE & CLERK OF COURT

OF

Law Firm of Shein & Brandenburg



Marcia G. Shein, M.S.*
Attorney at Law
marcia@msheinlaw.com

Elizabeth A. Brandenburg
Attorney at Law
elizabeth@msheinlaw.com

Federal Criminal Law Center

2392 North Decatur Road
Decatur, GA 30033
404-633-3797

404-633-7980 facsimile
www.federalcriminallawcenter.com
www.federalappealslawyer.com

*Also Admitted

- Admitted All Federal Circuit Courts
- United States Supreme Court
- Georgia Supreme Court
- Georgia Court of Appeals
- District of Arizona
- District of Colorado
- Northern District of Florida
- Middle District of Georgia
- Northern District of Georgia
- Southern District of Georgia
- Northern District of Indiana
- Eastern District of Michigan
- District of Nebraska
- Northern District of Oklahoma
- Eastern District of Tennessee
- Western District of Tennessee
- Eastern District of Texas
- Northern District of Texas
- Southern District of Texas
- Western District of Texas
- Pro Hac Vice Other Districts

April 3, 2014

John Baccus #187393
BRCI-MU 213
4460 Broad Road
Columbia, South Carolina 29210

Dear Mr. Baccus:

Thank you for contacting our firm. However, our firm no longer handles civil cases. We wish you the best in your continued endeavors.

Sincerely,

M. Shein (wp)
Marcia G. Shein, M.S.
Attorney at Law

44 29 DP 49

4.13.14

April 2, 2014

John Baccus #187393
Broad River Correctional Institution
4460 Broad River Road
Columbia, SC 29210



RE: Your potential claim - our file no. 14.0122

Dear Mr. Baccus,

Let me take this opportunity to thank you for contacting Bell Legal Group to review your potential claim. Our law firm represents a large number of inmates who have problems associated with their incarceration. We try to assist each inmate in any way we can, and when appropriate, we file claims on their behalf.

219 Ridge Street
Georgetown, SC 29440
Post Office Box 2590
Georgetown, SC 29442
PH 843-546-2408
FAX 843-546-9604
FAX 843-546-2919

434 C North Guignard Drive
Post Office Box 460
Sumter, SC 29151
PH 803-778-6531
FAX 803-773-3693

Although we handle prison abuse cases, we typically do not get involved with claims that are already filed. Therefore, we must respectfully decline representation and close this file in our office. **Please do not interpret our evaluation of your file as offering an opinion on the merits of your potential claim.** If you are interested in pursuing this matter, I encourage you to seek the advice of another attorney as soon as possible.


www.BellLegalGroup.com

Further, let me advise you that South Carolina has strict rules (known as the statute of limitations) that govern when a claim must be filed and served. If you miss the statute of a limitations deadline, you will be forever barred from filing a claim. Claims against public or charitable agencies and their employees are generally subject to a two-year statute of limitations while claims against private entities are generally subject to a three-year statute of limitations. These deadlines run from the date you knew or should have known about a claim.

Once again, thank you for contacting our firm. We hope that you will call upon us again if we can be of assistance with a different matter. In the meantime, please allow this letter to confirm that Bell Legal Group is not representing you and that you must take other steps to protect any interests you may have.

With the kindest regards, I am...

Very truly yours,


Mary A. Grimes
Attorney at Law

Enclosures: Client documents

30
45 OF 49

REC. 2.10.2014 from Mercant

☎ 404.688.12
☎ 404.688.94
www.schr.c

**SOUTHERN
CENTER FOR
HUMAN
RIGHTS**

February 10, 2014

83 Poplar Street, NW
Atlanta, GA 30303

Greetings:

We have received your request. We are sorry to say that we will not be able to be of assistance. Our practice is limited in both categories: the type of work we do; and the number of cases we can take. We are unable to take any new case or provide the information you request. This also includes distribution of legal/non-legal books and etc...

Best wishes in finding assistance elsewhere and in your efforts.

Sincerely,

The Law Office of the
Southern Center for Human Rights

Please find enclosed the attachments
you sent along with your request.

4L-OB 49



VAR Law Firm, LLC
P. O. Box 4055
Pawleys Island, SC 29585
Tel: 843-314-3122
Fax: 866-777-3083
Email: varlawfirm@gmail.com

Vanessa Ann Richardson, Esq.

January 23, 2014

Mr. John Baccus, #187393
Perry Correctional Institution Q2B121
430 Oaklawn Road
Pelzer, South Carolina 29669

Re: Potential Lawsuit

Dear John;

Please allow this letter to be a response to your letter we received January 20, 2014. Thank you for the opportunity to help you with your legal matters. Regrettably we are not taking on any new jail misconduct cases at this time.

Please be mindful that any state case filed against a governmental entity (SCDC) must be filed within two (2) years from the date of incident or within three (3) years if a federal 1983 action is filed. Please know that this firm has not made any determination as to your deadline to file your lawsuit; therefore be sure to discuss this with your attorney.

Finally, since we are unable to help you, please find enclosed your original documents. We wish you a success outcome to your legal endeavor and again, thank you for the opportunity.

Respectfully,

enclosures

47 OR-49 Richardson

THE RUTHERFORD LAW FIRM, LLC

2113 PARK STREET
P.O. BOX 1452
COLUMBIA, SC 29202

TELEPHONE: (803) 256-3003
FACSIMILE: (803) 256-9696

ALEXANDRA BENEVENTO
ATTORNEY OF COUNSEL

VICTOR LI
ATTORNEY OF COUNSEL

September 30, 2010

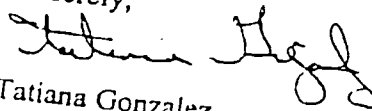
John Baccus #187393
McCormick C.I.F 2 148
386 Redemption Way
McCormick, SC 29899

Dear Mr. Baccus:

I have received the letter that Mr. Joan Duncan wrote on your behalf in regards to looking for pro bono representation on the injustices that the state has done against you. Unfortunately Mr. Rutherford does not have the time to take a pro bono case at this time. I can refer you to the South Carolina Bar where they can assist you with the name of an attorney that does pro bono work in this field. Please find enclosed the paperwork that you had forward to us.

I am sorry that I could not be of further assistance to you. Should you have any other questions or concerns please let me know.

Sincerely,



Tatiana Gonzalez
Legal assistant to J. Todd Rutherford

/tg

Enclosure

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF
COMMON PLEAS

JOHN BACCUS

PETITIONER,

vs.

NIKKI R. WALEY, RICHARD
ECKSTROM, CURTIS LOTTIS,
BRYAN P. STERLING, ROBERT
M. STEVENSON III, SHARONNA
SLITTON, MICHAEL STEPHAN,
CHRISTOPHER FLORIN, ANDREW
JEFF COAT, JOHN/DANIEL DOES.

RESPONDENT.

PETITIONERS MOTION
JURY TRIAL OF RIGHT
PURSUANT TO S.C.R. CIV. PROC.
3B

DOCKET NO 2014 CP 001 879

RICHLAND COUNTY
FILED
2014 SEP -5 AM 12:55
JEANETTE W. MCBRIDE
C.C.A. & P.D.

I ASK THE ABOVE COURT OF ~~COMMON PLEAS~~ TO ISSUE
PETITIONER AN ORDER GRANTING PETITIONER THE RIGHT OF TRIAL
BY JURY AS DECLARED BY THE CONSTITUTION OR AS GIVEN
BY A STATUTE OF SOUTH CAROLINA SHALL BE PRESERVED TO THE
PETITIONER MR. JOHN BACCUS INVIOLEATE; SOUTH CAROLINA RULES OF
CIVIL PROCEDURE RULE 3B JURY TRIAL OF RIGHT.

THIS _____ DAY OF _____ 20_____

JUDGE / CLERK OF COURT

OF