

The State of South Carolina IN the Court
of Appeals. ~~The Supreme Court of South Carolina~~

IN the Court of Common Pleas

APPEAL FROM LEE COUNTY

Circuit Court 3rd Judicial Circuit

RECEIVED

APR 20 2015

SC Court of Appeals

CASE NO: 2014-000674

Timothy GREEN # 113830 APPELLANT

Franklin Richardson Jr. ~~SR DC~~ + defendants
RESPONDANTS

INITIAL BRIEF of APPELLANT

Timothy GREEN # 113830
MARION UNIT L RM # 165
BRCI 4460 BROAD RIVER Rd.
COLA S.C. 29210

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TABLE of Authorities GRIEVANCEST GRIEVANCE
Policy. SMU Policy governing RESTRAINTS ON
SMU. Policy on USE of force. Policy on GRIEVING
IN the SMU. Policy on HOW MUCH CAN BE

LEGAL MAIL

1.) Policy dealing with medical treatment on SMO.
How much use of force can be used
on an inmate while restrained in a cell.
strict Policy.

2.) Violation of state and federal + civil laws.
By not giving Appellant notice of a witness
when stating at D.H.O he had no witnesses
for me to cross examine or hearing officer.

3.) Conflicting statements of Lt. Franklin Richardson
Jr. and Nurse Cooper. Plaintiff have some fine
proof that Nurse Cooper Lt. Franklin Richardson
Jr. is lying and he need a lawyer to prove
it. It would take but one day and it's all
over. Lt. Franklin Richardson Jr. stated in
his report he had no witnesses see
Incident Report.

4.) Lt. Franklin Richardson Jr. Assault + Battery
with intent to do bodily harm.

LEE County Nurse sees my eye bleeding
And walked by my room and wouldn't treat
me. Neglect deliberate indifference trying to cover up assault.
State and Federal Const.

Civil Rights
Cruel and unusual punishment.

FOR MONTHS APPELLANT had blisters on his tongue
and throat and still had scar damage that still
visible on APPELLANT tongue.

APPELLANT ATTORNEY Robert Butcher left APPELLANT
AT LEE CORR. INST. in danger. LOOK AT ALL THE
CHARGES APPELLANT receive while AT LEE CORR. INST.
that was placed on APPELLANT.

The letters that was sent to Bishopville
Magistrate judges office as proof + pictures taken
by Contraband Simon.

Smc Policy SECURING INMATES

STATEMENT OF ISSUES ON APPEAL

A). ON OR ABOUT 3-11-10 INMATE TIMOTHY GREEN^{FF} WAS BRUTALLY ASSAULTED BY LT FRANKLIN RICHARDSON JR. APPELLATE WAS SECURED BEHIND CELL DOOR ON LOCKUP. APPELLATE WAS SPRAYED DOWN HIS THROAT BY LT FRANKLIN RICHARDSON JR. BECAUSE APPELLATE CALLED HIM AN EX-STRIKER. SO MUCH GAS WENT DOWN APPELLATE THROAT HE WAS FORCED TO SWALLOW IT OR SUFFOCATE TO DEATH.

B). SUMMARY JUDGEMENT WAS BASED ON MY ATTORNEY NOT PRESENTED ANY MEDICAL DOCUMENTS WHICH WOULD'VE GOTTEN A TRIAL IN THIS CASE.

I WAS WORKING PRESS CHARGES ON LT. FRANKLIN RICHARDSON JR FOR ASSAULT & BATTERY WITH INTENT TO DO BODILY HARM. LEE CORR. INST ADMINISTRATION AND SECURITY THwarted MY EFFORTS TO RECEIVE OR GET JUSTICE. WHICH APPELLATE WANTED TO SHOW A CRIMINAL CONSPIRACY

The South Carolina Court of Appeals

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SC Court of Appeals

Timothy GREEN, 113830

Appellant

Initial Brief

CASE NO. 2011-~~CP-31187~~ 187

2011-CP-31187

Lt Franklin Richardson Jr. +

2014-000674

Defendants S.C.D.C.

This matter comes before this Honorable Court in a civil action C.A. 2014-000674. Plaintiff states that he can prove deliberate indifference.

Plaintiff was beaten by Lt. Franklin Richardson Jr. severely and placed on lock up in a corner room where no one could see him. Plaintiff wrote request to the investigator and Bishopville County Court trying to get him arrested. Plaintiff right eye closed shut his whole right side of his face was swollen. Plaintiff tried to get medical attention the next day from nurse Jones she

wouldn't stop and talk to him. He tried to talk to Nurse Pratt and he wouldn't talk to him.

That same day of the incident Nurse Cooper told the three officers.. Lt. Franklin

Richardson Jr. Sgt. Price Officer Cain. Officer

Farmer Officer ~~McKens~~ Officer Finkley,

Inmate Artie Bross. All of these people

present and none of them will take a lie

detector test about any of the things they are stating in their statements.

Lt. Franklin Richardson Jr. and Nurse Cooper

are lying. Policy states that no inmate

in the SMC Build can be taken out of

their cell with being in handcuffs.

Nurse Cooper and Lt. Franklin Richardson Jr.

will not ~~take~~ the courts or a jury such a lie.

She told them next page

to bring me to her office. But they didn't. I told them that my throat and stomach was burning. They said nothing but gave tylenol pills. For months my throat was sore I blisters on my tongue as well. After being on lockup for about "6" months. I seen nurse franklin and nurse Moody they looked down my throat and saw the blisters. It's in the records at medical. I made sore it was documented. Nurse ~~franklin~~ Rabon treated me for my throat for about three & 3" months ago more. My ribs was so sore and my knees you can see that something is badly wrong. And the vision in my right eyes is still blurred. Lt. Franklin Richardson Jr stated he never hit me or anything but I have officers as witnesses and an inmate worker saw it all. Lt. Richardson Jr. was slamming my head on the floor. I'll take a lie detector test. I been asking for one since day one. I seen the eye doctor at Kirkland on many occasions about my eye. the doctor stated in front of officer Lucky and of Mickens that I got beaten real good. And that I was being treated for a cut on my eyeball from

LEGAL MAIL ONLY

that beating. It is in medical Record the badly swollen eye
with a cut on it. Deliberate indifference to serious
Medical Needs of prisoners constitutes the unnecessary
and wanton infliction of pain proscribed by the Eighth
Amendment. In order to prevail on a constitutional
claim of inadequate medical care. Nurse Cooper came
up to "S.M.U" lockup because Lt. Richardson Sr. sprayed
gas down my throat. And I told them that this man
sprayed gas down my throat. He always tried to treat
us like we were the lowest thing on this earth. But
I found out that he was a sex stripper. How could I
act out the way they stated when I had just come
off of a hunger strike. I went without food and water
for 19 days. But they had documents of 12" days. They
said that we had to go 4 days before they could
document it. I lost 60 lbs. And I was too weak
to fight with these people or argue with them.
I lost so much weight that the guys on lockup
didn't recognize who I was. Everybody on this
yard will tell you Lt. Franklin Richardson Jr. assaulted
me.

LEGAL MAIL ONLY

Proof of deliberate indifference may be established by direct or by circumstantial evidence. Some of the types of direct evidence prisoners present sick call requests for medical attention or records reflecting.

1. The dates when medical attention was requested to whom the requests were submitted the medical conditions complained of the effects of any delay in obtaining access to medical staff;

the dates when access was provided;

specific medical staff seen.

Attorney Robert J. Butcher has the pictures of my face, my knees and my bruised ribs. Request that he send you a copy. When he showed

my family the pictures they couldn't believe that an officer of the law could do such a thing.

treatment provided by particular staff. the nature of follow up care ordered and whether it was carried out. Additional information to indicate the adequacy of treatment and complaints and formal grievances filed regarding the inadequate care. SEE GRIEVANCES ON MEDICAL STAFF.

The investigate medical care, was the request to Jones
And Pratt both nurse ignored Plaintiff complaint about
wounds his eye ribs and knees which are still being
neglected. Plaintiff still suffers from chronic pain check
medical files. Plaintiff's toes feels like they are going
to breakout. Medical described Plaintiff blood
pressure medicine for chronic headaches from his
head being slammed on the floor. Plaintiff don't even
have high blood pressure. Medicine that swell my shoulder
feet and legs with water. And took my sight. I thought
I was going to die. My lawyer I sent the medicine
to his office. The medicine Investigator and Corbett
And the captain itself inside my legal mail to my
Attorney. Which is a violation of my Constitutional
Rights Attorney - client relations.

And he did nothing unless I told him about it.
From the medicine I can't wear shoes anymore.
From the assault by Lt. Franklin Richardson Sr

I have pains in my eye + chronic headaches.
My right eye still has blackness around it.
(51)

My KNEES ARE still killing me. And they ARE still swollen.

My STOMACH is killing me. I HAVE two "2" types of Ulcers
NOW SINCE he SPRAYED the GAS down my THROAT.

GASTRO Ulcers AND bleeding Ulcers. WHEN FRANKLIN
Richardson Jr. Jumped down in my side with
his KNEE AND started punch Plaintiff in his face.

All the officers RAN into the shift office. only
officer FARMER picked me up off the floor. My
VISION was blurred from the BEATING. While

I WAS in handcuffs. I WAS weighing 146 lbs
down from 210 lbs. I WAS WEAK from the
hungerstrike. And in handcuffs what could
I do. My Mouth AND stomach was on fire.

I COULDN'T eat for days AFTERWARDS I live
off of milk AND bread. ASK DFC THOMPSON.

My LAWYER NEVER got depositions from these
critical witnesses. ESTELLE V GAMBLE 429 U.S. 97
103 (1976) WESTV. ATKINS 487 U.S. 42, 57-58 (1988)

RICHARDSON V. MCKNIGHT 521 U.S. 399 (1997)

ESTELLE, 429 U.S. AT 104 FARMER V. BRENNAN

511 U.S. 825, 836 (1994) (L)

Id At 843 Brady v. PUCKETT 157 F.3d 1022 (5th Cir
(1998) Brock v. Wright 315 F.3d 158, 162 (2nd Cir 2003)
Hud 503 U.S. At 10, 109 S.Ct At 997, 1000 Riley v Dorton
Riley v. Dorton 115 F.3d 1159, 1168 (4th Cir 1997)
spraying gas down a prisoners throat is de minimis.

What is deliberate indifference? According to the
Supreme Court, deliberate indifference is a state of
Mind more blameworthy than mere negligence but
less culpable than purposeful misconduct. See Farmer
571 U.S. At 835. Deliberate indifference holds
that a prison official will be held liable under
the Eighth Amendment. Only if he knows that
inmates face a substantial risk of serious harm
and disregards that risk by failing to take
reasonable measures to abate it. Id. At 847
Under this test, prisoners alleging Eighth
Amendment violations need not show that a prison
official acted or failed to act believing that
harm actually would befall an inmate; it is enough
that the official acted or failed to act despite his
knowledge of a substantial risk of serious harm
Id. At 842.

I HAVE WITNESSES THAT WAS THERE AND HEARD NURSE COOPER TELL THE OFFICERS + Lt. Richardson Jr. to bring to medical after the assault. I CAN blow this case out of the water. And that they put me in a corner room to ~~see~~ and heal before anyone knew about the assault.

The Eighth Amendment requires that prison officials provide a system of ready access to adequate medical care.

Prison officials show deliberate indifference to serious medical needs if prisoners are unable to make their medical problems known to the medical staff or if the staff is not competent to examine the prisoners, diagnose illnesses, and then treat or refer the patient. The prison must also provide an adequate system for responding to emergencies.

If outside facilities are too remote or too inaccessible to handle emergencies promptly and adequately, then the prison must provide adequate facilities and staff to handle emergencies within prisons.

SEE IMAGE CARE & GRIEVANCES.

I know that I am seriously sick from the way we were being fed and treated. Ask Senator Ralph Anderson.

Clement v. Gomez 298 F.3d 898, 904 (9th Cir 2002)

Greeno v. Daley 414 F.3d 645, 653 (7th Cir 2005) Brock v.

Wright 315 F.3d 158, 163-64 (2nd Cir 2003) Clement v. Gomez

298 F.3d 898 (9th Cir 2002) Ellis v. Butler 890 F.2d 1001,

1003 (8th Cir 1989). Bouchard v. Magnusson 715 F. Supp. 1146,

1148 (D. Me 1989)

Lt. Richardson stated that I call him an eggstripper, while in a holding cell 4 feet wide and 4 feet long. Plaintiff only asked him what was he being locked up for? What he didn't realize that I wasn't one of the guys that told him to jump on me and wait for get back, knowing how corrupt the Administration is. I had to get a guy down stairs to contact my family and let them know what happened. 6 days later my niece contact Robert Butcher. He came up and took pictures of my wounds. There so many people that's been hurt by him and other officers. Most can't read or write. And they tell the guys that file grievances they are switching and fall for it.

Immunity in "NO" forms can be granted to him on summary judgement because the genuine issues of material fact existed precluding summary judgement, on whether prison guards complied South Carolina's official policy governing use of force when inmate has been restrained and

IN A HOLDING CELL. POLICY DOES NOT STATE THAT A PRISON OFFICIAL
CAN USE MACE OR GAS WHEN AN INMATE IS RESTRAINED AND BEHIND
DOORS. PLAINTIFF WAS NOT KICKING AND HANGING ON CELL DOOR.
PLAINTIFF STATES THAT HE HAS OFFICIAL WITNESSES THAT HIS LAWYER
WAS TOLD TO GET DEPOSITIONS FROM. PLAIN HAS A EXPERT WITNESS
STATEMENTS AND WITH OFFICERS PRESENT SAYING THAT HE WAS
PUNCHED IN THE EYE REPEATEDLY.

PLAINTIFF STATES THAT HE CAN PROVE COLORFUL PROOF ACERTAIN
PLAINTIFF WHO ASSERTS MALICIOUS AND SADISTIC USE OF FORCE
NEED NOT SHOW THAT FORCE CAUSED EXTREME DEPRIVATION OR
SERIOUS OR SIGNIFICANT PAIN OR INJURY TO ESTABLISH EIGHTH
AMENDMENT CAUSE OF ACTION. ALL THAT IS NECESSARY IS
PROOF OF MORE THAN DE MINIMIS PAIN OR INJURY.

THIS IS PROOF THROUGH MATERIAL FACTS THE CAUSE OF INJURY
AND THAT LT. FRANKLIN RICHARDS SR. DID BRUTALLY BEAT
INMATE TIMOTHY COREAN ASK HIM TO TAKE A LIE DETECTOR
TEST THAT HE DIDN'T BEAT PLAINTIFF IN THE FACE. AND
STAM HIS HEAD ON THE FLOOR AND DROP DOWN ON
PLAINTIFF SIDE. AND SPRAY GAS DOWN HIS THROAT AND
IT WASN'T PERSONAL. IF PASS I'LL DROP THIS CASE.

I KNOW JUST AS MOSES STOOD BEFORE THE BURNING
BUSH HE'LL FAIL. WILLIAMS V. BENJAMIN 77 F.3d 756. 14th
CIR. 1996).

There is a genuine issue of material fact is technically
A question of law but its Resolution depends on an
Assessment of the evidence submitted in support of
the Plaintiff Johnson v Jones U.S. 115 S.Ct 2157. 132
L.Ed.2d. 238 (1995) 115 S.Ct. At 2156-58

It occurs to the fact that Lt. Franklin Richardson Jr. by Acting
out his personal feeling because of all the paperwork I
was filing on him. Defendant has not enlightened this
Court on the score of what's really going on.

SEE Grievances and that we were bringing heat on
him and everyone else about the abuse and
cruel and unusual punishment that was dealt out
to us. Robert Butcher has the statements.

Schertz v. USA & PACA County, 875 F.2d 578, 583 (7th Cir.
1989). But misuse of official authority for private ends
is a recurrent feature of cases in which a deprivation
of life, liberty, or property without due process
of law is found. Screws v. United States, 325
U.S. 91, 93, 111, 65 S.Ct. 1031, 1032, 1040, 89 L.Ed.
1495 (1945). Gibson v. City of Chicago 910 F.2d
1510, 1518 (7th Cir 1990).

The distinction is between an act that is justifiable
if considered without regard to the Actor's Motive

objectively justifiable, is explicable only in terms of the actor's motivation, as in a case of police brutality so egregious that it can be explained only by reference to a racist or other improper motive for the defendant officer's action.

INEFFECTIVE ASSISTANCE OF COUNSEL ATTORNEY MISCONDUCT.

ATTORNEY WAS TOLD TO FILE SUIT AGAINST LT. FRANKLIN RICHARDSON JR. AND MEDICAL AT LEE COUNTY OR THE MEDICAL AGENCY. SEE AFFIDAVIT OF RECORDS CUSTODIAN.

PLAINTIFF STATES THAT HIS LAWYER IS A CIVIL ATTORNEY & COUNSELOR, A PROFESSIONAL IN HIS CRAFT. THERE'S

NO WAY POSSIBLE THAT ATTORNEY COULD HAVE FILED SUIT AGAINST THE DEPARTMENT. ATTORNEY VIOLATED RULE OF PROFESSIONAL CONDUCT. RULES VIOLATED:

RULE 407, SCALC; RULE 1.1 FAILING TO PROVIDE COMPETENT REPRESENTATION; RULE 1.2 FAILING TO ABIDE BY A CLIENT'S DECISIONS CONCERNING THE OBJECTIVES OF REPRESENTATION

AND FAILING TO CONSULT WITH THE CLIENT AS TO THE MEANS BY WHICH THEY ARE TO BE PURSUED; RULE

1.3 FAILING TO ACT WITH REASONABLE DILIGENCE AND PROMPTNESS WHILE REPRESENTING A CLIENT; RULE 1.4

FAILURE TO KEEP A CLIENT REASONABLY INFORMED ABOUT THE STATUS OF A MATTER AND FAILING TO

(NURSE COOPER SAID THAT ALL HE DID WAS
THROW HIM TO THE GROUND AND PUT HIS HANDS
BEHIND HIS BACK) "REMEMBER THEY CAN'T TAKE
YOU OUT OF A CELL WITHOUT BEING IN ^{POLICY SMS}
HANDCUFFS. CLEAR LIES CHECK POLICY SMS.
YOU CAN'T COME OUT OF ANY ROOMS WITHOUT
BEING IN HANDCUFFS. I THINK I HAVE
SHOWS YOU ENOUGH LIES. I KNOW THAT ^{EVEN IF YOU ARE DEAD THEY PUT IN CUFFS}
YOU CAN LOOK AT EXH B KAREN COOPER RN.
STATEMENT AND LT FRANKLIN RICHARDSON JR. EXH C
STATEMENT AND INCIDENT REPORT EXH E.
AND SEE THE COVERUP AND LIES.

I CAN PROVE WITHOUT A SHADOW OF A
DOUBT THESE ARE LIES. I HAVE FACTS
TO PROVE IT AND WITNESS ALSO. PLEASE
GRANT ME A TRIAL SO I CAN GET
OR RECEIVE JUSTICE.

LEGAL MAIL
SALUDA UNIT

SEE INCIDENT REPORT OF LT. FRANKLIN RICHARDSON JR. THEY ARE CONFLICTING. LT. FRANKLIN RICHARDSON JR. NEVER SEEN NONE OF THE THINGS NURSE COOPER SEEN. ALSO LT. FRANKLIN RICHARDSON JR. INCIDENT REPORT WAS WRITTEN IN A THIRD PARTY. SOMEONE ELSE WRITTEN IT. LOOK AT LT. RICHARDSON STATEMENT ONE OF THEM IS CLEARLY LYING. INMATE GREEN WAS SPRAYED BEHIND THE DOOR HE COULDN'T HURT ANYONE. THE REASON HE WAS SPRAYED IS BECAUSE HE CALL LT. FRANKLIN RICHARDSON JR AN EX-STRIPPER. ALSO HE HAD NO WITNESS AT THE DHO HEARING. BEFORE YOU CAN TAKE ANYONE OUT A CELL IN SMS HE MUST BE IN HANDCUFF WITH ANOTHER OFFICER THERE. ALSO THERE MUST BE A USE OF FORCE REPORT AND A REPORT OF THE USE OF GAS AND AMOUNT.

LEGAL MAIL

SALUDA UNIT

Plaintiff for assistance. And was denied Plaintiff
complained about his stomach for months and his throat
and tongue. Plaintiff finally saw nurse Franklin,
and nurse Moody who saw the blisters on
Plaintiff tongue and throat. The burning of his
throat stomach and behind part for months,
from the gas Lt. Franklin Richardson Jr.

This is deliberate indifferent and Eighth Amend
ment violation. Estelle v. Gamble, 429 U.S. 97,
103 (1976) The Supreme Court explained
that is because and inmate must rely on prison
authorities to treat his medical needs; if the
authorities fail to do so, those needs will
not be met.

Prison officials put Plaintiff in the corner on
lockup so that he would be seen. Hiding him
from the rest of the officers and inmates.

All pictures, Motions, Grievances, request to staffs
Medical files, depositions, statements, declarations
that Appellate gave him because his documents
and statement was getting missing every time
they shook his room down. All declarations
and statements, Letters.

Appellate states that the file of his attorney is
needed desperately to perfect his appeal.

Appellate states that the pictures and statements
would over whelm the defendants and that
this honorable court would rule in Appellate
favor. Appellate states that his attorney
file is needed desperately to perfect his
appeal and over come summary judgement.

I pray that this honorable court would
grant Rule 260 Motion to file the document
of out of time Motion due to the lockdown
his attorney file is needed to perfect his
appeal.

 **LEGAL MAIL**

ARGUMENTS

Lt. Franklin Richardson Jr. state in his incident report that inmate ~~Timothy~~ Green Plaintiff was told by nurse Karen Cooper to come out of the holding cell when he ~~came~~ came out of the holding cell he charged towards Lt. Richardson spitting on Lt. Richardson on his right arm. Ex. E Now read Nurse Karen Cooper statement. That she remembered vividly and the incident between Inmate Green and Lt. Franklin Richardson Jr. "Remember, I am in handcuffs".

states when I arrived at the SMU holding cell. Inmate Green was acting irrational and yelling within the cell. He was beating his head up against the walls and slamming his body. She stated, I approached the cell and advised him that I wanted to see him in medical. He initially calmed down and agreed to go to the nurses room that was just a few feet away from the holding cell.

see on
5000
holding
policy

see Ex. A & H
image case file

70
EXAM

SEE INCIDENT REPORT OF LT. FRANKLIN RICHARDSON
JR. THEY ARE CONFLICTING. LT. FRANKLIN RICHARDSON
JR. NEVER SEEN NONE OF THE THINGS NURSE
COOPER SEEN. ALSO LT. FRANKLIN RICHARDSON JR.
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LEGAL MAIL

SALUDA UNIT

(NURSE COOPER SAID THAT ALL HE DID WAS
THROW HIM TO THE GROUND AND PUT HIS HANDS
BEHIND HIS BACK) "REMEMBER THEY CAN'T TAKE
YOU OUT OF A CELL WITHOUT BEING IN
HANDCUFFS. CLEAR LIES CHECK POLICY SMS.
YOU CAN'T COME OUT OF ANY ROOMS WITHOUT
BEING IN HANDCUFFS. I THINK I HAVE
SHOWN YOU ENOUGH LIES. I KNOW THAT
YOU CAN LOOK AT EXH B KAREN COOPER RN.
STATEMENT AND LT FRANKLIN RICHARDSON JR. EXH C
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I CAN PROVE WITHOUT A SHADOW OF
DOUBT THESE ARE LIES. I HAVE FACTS
TO PROVE IT AND WITNESS ALSO. PLEASE
GRANT ME A TRIAL SO I CAN GET
OR RECEIVE JUSTICE.

LEGAL MAIL
SALUDA UNIT

Table of Authorities

S.C. Code Ann 15-78-100

Violations of State + Federal Const.

Estelle v. Gamble 429 U.S. 97, 103 (1976)

West v. Atkins 487 U.S. 42, 57-58 (1988)

Richardson v. McKnight 521 U.S. 399 (1997)

Estelle, 429 U.S. At 104 FARMER v. BRENNAN

511 U.S. 825, 836 (1994)

Id At 843 Brady v. Pockett 157 F.3d 1022

(5th Cir (1998) Brock v Wright 315 F.3d 158, 162

2nd Cir (2003) Hud 503 U.S. At 10, 109 S.Ct.

At 997, 1000 Riley v Dorton Riley v. Dorton 115 F.3d 1159, 1168 14th Cir 1997)

FARMER 511 U.S. At 835. Id. At 847

Eighth Amend violation

Knowledge of a substantial risk of serious

harm Id. At 842 Clement v. Gomez

298 F.3d 898, 904 (9th Cir 2002)

Greeno v. Daley 414 F.3d 645, 653 (7th Cir (2005))

Brock v. Wright 315 F.3d 158, 163-64 (2nd Cir

2003)

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CLEMENT V GOMEZ 298 F.3d 898 (9th Cir 2002)

ELLIS V. BUTLER 890 Fed 1001 1003 (8th Cir 1989)

BOUSCHARD V. MAGNUSON 715 F. Supp. 1146-1148 CD
ME 1989.

Policy under use of force

Policy regarding using gas on inmate in lockup
cell or holding on handcuffs.

WILLIAMS V. BENJAMIN 77 F.3d 756 (4th Cir 1996)

SCHERTZ V. WAUPACA COUNTY, 875 F.2d 578, 583

7th Cir 1989) SCREWS V. UNITED STATES 385 U.S.

91, 93, 111, 65 S.Ct 1031, 1032, 1040, 89 L.Ed 1495

1945) GIBSON V CITY OF CHICAGO 910 F.2d 1510

1518 (7th Cir 1990)

LEGAL MAIL

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Exh A, B, C, D.

Medical Exam

Medical Records

SEE Affidavit of

SEE Declaration by SIMA RA HUNTER # 249892

SEE Declaration by JABBAR JOMO STANUS # 231018

SEE Exh D.

SEE Exh G.

SEE Exh Motion for his legal files with Attorney
Robert Butcher that's before his honorable

Court
Robert Butcher + Deborah Butcher is a witness

that it's "NO WAY" possible that Plaintiff
could have fell and hit his eye.

SEE Motion before the Court of Common
Pleas & the Third Judicial Circuit.

LEGAL MAIL
SALUDA UNIT

1. Plaintiff ASK this HONORABLE COURT to look AT these
Exhs B. Exh. C. Exh E.
2. Exh E. Initial report 3/11/10 NO WITNESSES, NO EMPLOYEES
INVOLVED. NO EVIDENCE.
3. Incident report written in the third person.
Meaning he didn't write it.
4. The conflicting statement of Lt Franklin Richardson Jr.
And Nurse Cooper.
5. Nurse Cooper NEVER MADE A INITIAL REPORT OR REPORT
AS A witness I would've called her AT the
D.H.O hearing. She stated she didn't witness
Anything I have proof.
6. Lt Franklin Richardson Jr. didn't write or file A
USE OF force report.

LEGAL MAIL
SALUDA UNIT

002.

7. This is NOT AN ISOLATED INCIDENT THIS IS A PATTERN.

8. Lt. FRANKLIN RICHARDSON JR. DIDN'T FILE A MAJORITY REPORT.

9 Lt. RICHARDSON JR. AND NURSE COOPER STATEMENTS OR CONFLICTING.

SEE EXH A.1 EXB.2

10. IN ADEQUATE MEDICAL TREATMENT

11. MEDICAL MALPRACTICE

Plaintiff have statement to show the actions of Lt. Franklin Richardson Jr. over the years and his assaulting friends.

12. Plaintiff Attorney had Plaintiff Aband for his life. Because he left him in the hands of these people a Lee corp. Sub

LEGAL MAIL
SALUDA UNIT

13. EXCESSIVE USE OF FORCE

14. ASSAULT & BATTERY

15. GROSS NEGLIGENCE AND NEGLIGENCE

16. MOVE FOR SANCTIONS AGAINST NURSE COOPER AND LT. FRANKLIN RICHARDSON JR. FOR LYING TO THIS HONORABLE COURT IN A SWORN STATEMENT.

17. SANCTIONS FOR PERJURY

18. LT. FRANKLIN RICHARDSON JR. LT. DAVIS LT. JUNE SGT.

BRAYBOY LT. MAJOR, ASS. WARDEN DEAN, HAS A HISTORY OF ASSAULTING INMATES. I HAVE A LIST OF INMATES AND STATEMENTS SWEARING TO THIS HONORABLE COURT ABOUT THE ASSAULTS AND BEATINGS BY THE OFFICERS.

SOME HAVE BEEN FREED. THE ADMINISTRATION HAS COVERED UP YEARS OF BEATINGS BY THESE PEOPLE.

THEY HAVE A HISTORY OF THESE CRIMES AND OTHER TRICKS, QUIBBLES, AND LIES.

LEGAL MAIL

SALUDA UNIT

CONCLUSIONS

Plaintiff states that it is clear that Lt. Franklin Richardson Jr. didn't put Karen Cooper down as a witness because he didn't know what she would say.

And Nurse Karen Cooper didn't agree with Lt. Franklin Richardson Jr. until she sees that she was being sued as well for negligence.

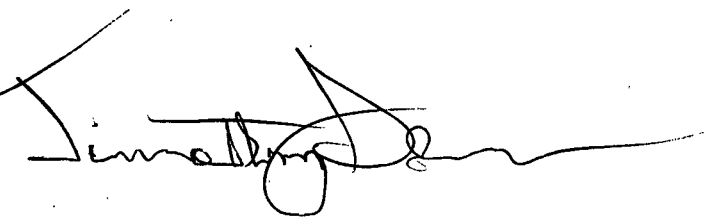
But I have two witnesses to her saying something totally different. A trial or lie detector test would show that they are lying. And that I was brutally assaulted. And they are trying to cover it up. I will agree to a lie detector test anytime.

Because I am truthfully honest about the whole thing. Everything and I don't curse.

Only a lie detector and or a trial will get to the truth of this matter. I promise you that Lt. Franklin Richardson Jr. or Nurse Cooper will

LEGAL MAIL
SALUDA UNIT

AGREE TO A LIE DETECTOR TEST WITH MY QUESTION GIVEN
TO THIS HONORABLE COURT TO ASK. NOT ONLY WILL HE
BE FIRE BOTH OF THEM. THEY WILL GO TO JAIL. ~~85%~~
OF THE DEFENDANT WILL ~~BE~~ FIRED. THEY ARE
CORRUPT. GIVE THEM A LIE DETECTOR TEST THEY'LL
QUIT BEFORE THEY'LL TAKE IT. GOD IS MY WITNESS
THEY WILL. I PRAY THAT THIS HONORABLE COURT
GRANT THIS CASE BEFORE THE COURT FOR TRIAL OR
GIVE THE DEFENDANTS LIE DETECTOR TEST. I KNOW
LT. FRANKLIN RICHARDSON JR. WILL FAIL AS WELL
AS NURSE KAREN COOPER. I PRAY THIS DAY 1-22-
15 THAT THIS COURT WILL GRANT MY PETITION
BEFORE THEM.

I Am 

CONCLUSIONS

Plaintiff states that it is clear that Lt. Franklin Richardson Jr. didn't put Karen Cooper down as a witness because he didn't know what she would say.

And Nurse Karen Cooper didn't agree with Lt. Franklin Richardson Jr. until she sees that she was being sued as well for negligence.

But I have two witnesses to her saying something totally different. A trial or lie detector test would show that they are lying. And that I was brutally assaulted. And they are trying to cover it up. I will agree to a lie detector test anytime.

Because I am truthfully honest about the whole thing. Everything. And I don't curse.

Only a lie detector and or a trial will get to the truth of this matter. I promise you that Lt. Franklin Richardson Jr. or Nurse Cooper won't

AGREE to a lie detector test with my question given
to this honorable court to ask. Not only will he
be fire both of them. They will go to jail. ~~85%~~
of the defendant will be fired. They are
CORRUPT. Give them a lie detector test they'll
quit before they'll take it. GOD is my witness
they will. I PRAY that this honorable court
GRANT this case before the court for trial or
give the defendants lie detector test. I know
Lt. Franklin Richardson Jr. will fail as well
as nurse Karen Cooper. I PRAY this day 1-22-
15 that this court will grant my petition
before them.

I Am 