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JUN 02 2015

SC Court of Appeals

Mr. John Bacus #187343  
LEE C.I. FS A 164  
990 WASHINGTON HWY.  
BISHOPVILLE, S.C. 29010

The Honorable Jenny Abbott Kitchings, Clerk of Court  
S.C. Court of Appeals 1210 Senate St.  
Columbia, S.C. 29201

RE: BACUS V. HALEY, STERLING ET AL  
APPELLATE CASE NO 2015-000133  
CASE NO. 2014-CP-40-2829

May 27, 2015

Dear Ms. Kitchings:

Please find enclosed the original and copy each of the appellants offer of proof evidence titled Exhibits A & B evidencing copy of his initial brief designation of matter... to impeach respondents attorney Davidson and Lindemann, P.A. 5/11/15 Motion to Dismiss Appeal for Disbarment, Civil and Criminal Contempt or Discharge... Demand Appellants Right to Sue Summon, and Complaint Appeal Proceedings continue with July trial, and appointment of counsel for Appellant, and proof of service relative to the above matter. Please file the originals, returning the clocked copy to me for my files and management.

By copy of this letter, I hereby serve a copy of the above documents upon other state and federal court agency.  
Thank you for your assistance in this matter.

Very Truly Yours,  
Mr. John Bacus

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY

L. CASEY MANNING, CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2015-000133  
CASE NO. 2014-CP-40-2024

JOHN BACCUS

v.

APPELLANT,

NIKKI R. HALEY  
BRYAN P. STALING ET AL

RESPONDENTS.

APPELLANTS' OFFER OF PROOF EVIDENCE TITLED EXHIBITS, A-F, IN CONJUNCTIONS WITH RULE 401 THRU 600, SCACR; RULE 11 SCRPC AND SEC. 16-5-10, DEMANDS DISBARMENT, DISCHARGE FOR RESPONDENTS ATTORNEY'S MAY 11, 2015 IMPEACHMENT OBLIGATION, MOTIONS FOR JURY TRIAL...

COMES NOW THE APPELLANT, MR. JOHN BACCUS, WITH HIS OFFER OF PROOF EVIDENCE TITLED EXHIBITS # A-F, TO Respectfully Demand That The Federal And The State of S.C. Courts And Agency TAKE JUDICIAL NOTICE OF, And Declare SPEEDILY Unto Appellant, Based upon Exhibits A-F, Why A Federal And State Court Agency Order Should NOT BE ISSUED For Respondents Attorney, Davidson And Lindeman Law Firms' Disbarment, Civil And Criminal Contempt, Or Discharge, For Violation, [RULE 401 THRU 600, SCACR; RULE 11, SCRPC; SCDC CODE ANN. 30-1-10, SCDC Policy Procedure No. 21-09, And Section 16-5-10.] Their Duty Of Good Faith And Duty Of Loyalty In Preparing Its May 11, 2015 Motion To Dismiss Appeal, (i.e., Exhibit # D or OBLIGATION), By Acting Intentionally With Reckless Disregard For Appellants SCDC Debit Form 10-14, Proof And Affidavit Of Service Evidencing Copy Of His INITIAL BRIEF DESIGNATION OF MATTER, That BRCI Mail Room, Ms. S. Prue Did On 2/27/2015 NOTARIZED, PHOTO-COPIED, POSTAGED, CERTIFIED OR SIGN AND ATTESTED TO MAILING TO COURT OF APPEALS AND RESPONDENTS ATTORNEY, (i.e., Exhibit # A-F), TO IMPEACH Respondents Attorney 5/11/15 MOTION TO DISMISS APPEAL OBLIGATION? And As A Result Of Appellants 2/27/2015 Application To Vacate

Allen, Clerk of Court issued the 3/05/15 OBLIGATION, [EXHIBIT # F],  
That Respondents Attorney Davidson And Lindemann, P.A., Now  
Attempts To Secretly And Pretextually For Discriminatory Reasons,  
Dismiss Appeal Of Appellant.

---

### CONCLUSION

THEREFORE, Based on the Forgoing, Appellant Demand that His  
Right to sue. Summons and Complaint Appeal Proceedings  
Continue with Jury Trial, and Appointment of Counsel,  
From Exhibits # F, And Respondents Attorney Davidson And  
And Lindemann, P.A.'s Disbarment, Civil and Criminal Contempt  
Or Discharge For Preparing Its May 11, 2015 Motion to Dismiss  
Appeal OBLIGATION (P.E., Exhibit # D), Impeachments.

Respectfully submitted,

Mr. John Baccus  
Mr. John Baccus  
Lee C. I. P.S. A 1164  
990 Wasuky Hwy.  
Bishopville, S.C. 29010

Bishopville, South Carolina  
May 27, 2015



# EXHIBITS # B

THE STATE OF SOUTH CAROLINA IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS

L. CASEY MANNING CHIEF JUDGE FOR ADM. PURPOSES

CASE NO. 2014-CP-40-028 29. BACCUS V. HALEY ET AL.

JOHN BACCUS

PETITIONER/ APPELLANT,

v.

NIKKI R. HALEY  
BRIAN P. STERLING

DEFENDANTS/ APPELLEES.

## PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Nikki R. Haley et al Appellees by depositing a copy of it in the United States Mail, Postage Prepaid, on about 2.20.2015 then again on about 2.27.2015, addressed to her/his Appellees Attorney of Record Alan Wilson, Dennis Bldg. Box 11544 Columbia SC 29211. It was mailed from The Broad River Corri. Inst. Mailroom. Also copy to DC Pyle and A.J. Crockett Esq. AF SC HC 10 Docket February 27, 2015

Mr. John Baccus  
Mr. John Baccus  
4460 Broad River Road  
BR CT, MAR, 255  
Columbia SC 29210

HAS SWORN TO AND SUBSCRIBED TO BEFORE ME THIS  
27th DAY OF February 2015  
NOTARY Susan V. Zipe  
EXP: \_\_\_\_\_

My Commission Expires  
March 5, 2015

EXHIBITS # C  
STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE COURT OF APPEALS

JOHN BACCUS #187343

CASE NO. 2014CP-40-2824

APPELLATE C/N 2015-000133

APPLICANT,  
vs.

AFFIDAVIT OF SERVICE BY MAIL

NIKKI R. HALEY, BRIAN  
P. STILINC ET AL  
RESPONDENTS.

1. I Am An Inmate Of The Respondents Wrongfully Incarcerated In The Above-Captioned Action.
2. Regular Communication By Mail Exists Throughout The State Of South Carolina [BUT NOT AT THE B.R.C.I. MAILROOM] And That This Is The Only Circumstances Of Service Available By Mail.
3. By Respondents Locking Down Dead Locking Appellant In A Cell For Nearly A Month, March 13-31, 2015 ON GOING, And Not Appropriating or Providing Him With TYPEWRITER, INK PEN, PAPER, STAMPED ENVELOPES, POSTAGE, ACCESS TO LAW LIBRARY OR LIBRARY BOOKS, RESPONDENTS PREVENTED APPELLANT FROM ENSURING COURT ORDERED PARTICULARIZED NEEDS WERE NOT PROPERLY MET.
4. I Have This Day Attempted To Serve A Copy Of The INITIAL BRIEF On The Court Of Appeals, Respondents Attorneys Of Record In The Above Captioned Matter On The Following Persons By Requesting LEGAL SUPPLIES TYPEWRITER, PHOTOCOPIES FROM RESPONDENTS PRISON KEEPERS TO NO AVAILS By depositing whatever responses or LEGAL SUPPLIES RESPONDENTS ALLOW In The United States Mail At B-R-C-I. Mailroom Or Lock Down Mail Box Of B-R-C-I. Mannerism.

Jenny Abbott Kitchings Clerk  
1015 Sumter St  
Columbia S.C. 29201

DANIEL C. PLYLER 11611 DEVONSHIRE DR. COLA SC 29202  
DANIEL J. CROOK III 4444 BROAD RIVER RD. COLA SC 29221

DATED THIS 23<sup>RD</sup> TH OF FEBRUARY 2015

Mr John Baccus  
Mr John Baccus

EXHIBIT D

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

Appeal No. 2015-000133  
Case No. 2014-CP-40-2829

John Baccus, ..... Appellant,

v.

Nikki R. Haley  
Brian P. Sterling, ..... Respondents.

MOTION TO DISMISS APPEAL

The Respondents hereby move this Court pursuant to Rule 260(a), SCACR, to dismiss the Appellant's appeal based upon the Appellant's failure to comply with the Appellate Court Rules and the explicit instructions of this Court.

Specifically, the Respondents assert that the Appellant has failed file and serve his Initial Brief and Designation of Matter, and therefore the Appellant has failed to comply with Rules 208(a) and 209, SCACR. This Court informed the Appellant of the deadlines for filing and serving his Initial Brief and Designation of Matters, in this Court's letter dated March 5, 2015. Specifically, the Appellant was instructed, in this Court's March 5, 2015 letter, that, "[i]t is the Court's understanding that there is no transcript available in this matter. Therefore, the appellant's initial brief and

designation of matter must be served and filed no more than thirty days from the date of this letter.”

That deadline has now passed, and the Appellant has neither filed nor served his Initial Brief or

~~Designation of Matter.~~

Therefore, based on the forgoing, the Respondents request that this appeal be dismissed.

Respectfully submitted,

DAVIDSON & LINDEMANN, P.A.

By: 

DANIEL C. PLYLER  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Respondents*

Columbia, South Carolina  
May 11, 2015

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY

L. Casey Manning, Circuit Court Judge

---

Appeal No. 2015-000133  
Case No. 2014-CP-40-2829

---

John Baccus, ..... Appellant,

v.

Nikki R. Haley  
Brian P. Sterling, ..... Respondents.

---

**PROOF OF SERVICE**

---

The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Respondents, does hereby certify that service of the Motion to Dismiss Appeal in the above-captioned action was made upon all parties and counsel of record by placing same in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 11<sup>th</sup> day of May, 2015, addressed as follows:

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

*Shelley E Stafford*

EXHIBITS # E  
April 8, 2014

**Via Certified Mail Return Receipt Requested:**

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

**BELL  
LEGAL  
GROUP**

*A Leading National Civil Litigation Firm*

RE: Your potential claim – our file no. 14.0122

Dear Mr. Baccus,

I am in receipt of your recent letter dated April 7, 2014. As you know, 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.

You first contacted us about this matter on February 4, 2014, and we notified you via letter dated April 2, 2014 that our office is unable to assist with this matter. While we greatly appreciate you contacting us, we must keep this file closed in our office. Enclosed, please find the documentation you provided to us.

**Please do not interpret our evaluation of this file as offering an opinion as to the merits of your potential claim.** There are many reasons why our firm may not accept a potential claim. Should you wish to pursue this matter, I encourage you to seek the advice and review of another attorney.

**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 let this letter 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*  
Mary A. Grimes  
Attorney at Law  
(egd)

MAG/egd  
Enclosures as stated

BELL LEGAL GROUP, LLC

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

[www.BellLegalGroup.com](http://www.BellLegalGroup.com)

REC. 2.10.2014 from Merchant

☎ 404.688.121  
☎ 404.688.94  
www.schr.o

**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.**



**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,

*V. Richardson*

enclosures

THE RUTHERFORD LAW FIRM, LLC

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

TELEPHONE: (803) 256-3003  
FACSIMILE: (803) 256-9698

ALEXANDRA BENEVENTO  
ATTORNEY OF COUNSEL

VICTOR LI  
ATTORNEY OF COUNSEL

September 30, 2010

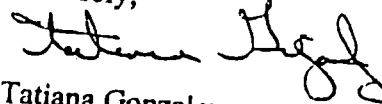
John Baccus #187393  
McCormick C.I. F 2 148  
386 Redemption Way  
McCormick, SC 29899

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.

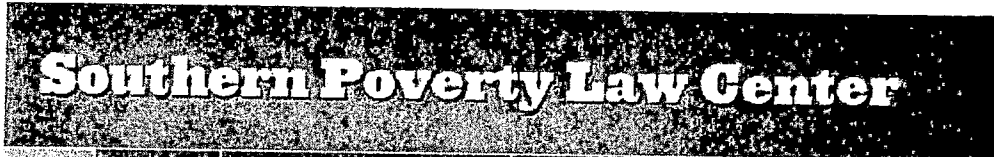
Sincerely,



Tatiana Gonzalez  
Legal assistant to J. Todd Rutherford

/tg

Enclosure



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EXHIBIT # F



## The South Carolina Court of Appeals

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CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

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1015 SUMTER STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

March 05, 2015

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

Re: John Baccus v. Nikki R. Haley  
Appellate Case No. 2015-000133

Dear Mr. Baccus:

It is the Court's understanding that there is no transcript available in this matter. Therefore, the appellant's initial brief and designation of matter must be served and filed no more than thirty days from the date of this letter.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Daniel Clifton Plyler, Esquire  
Daniel John Crooks, III, Esquire

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY  
L. CASEY MANNING, CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2015-000133  
CASE NO. 2014-CP-40-2824

JOHN BACCHUS,

v.

APPELLANT,

NIKKI R. HALEY  
BRYAN P. STERLING.

RESPONDENTS.

PROOF OF SERVICE

The undersigned Inmate of Respondents Wrongfully Incarcerated, does hereby certify that service of his offer of proof evidence titled Exhibits # A-F Evidencing copy of his initial brief designation of matter. To impeach Respondents Attorney SA 11/15 motion to dismiss appeal, For Disbarment, Civil and Criminal Contempt or Discharge Demand, Appellants' Right To Sue Summons and Complaint Appeal Proceedings Continue With Jury Trial and Appointment of Counsel for Appellant, In the above Instant Matter, was made upon all parties and counsel of record by placing same in the United States Mail At Lee Ct Mail Room Discretion and Mannerisms, At The Below Listed Address Clearly Indicated on said Envelope This 2 TH DAY OF May 27, 2015, Addressed As follows:

The Hon. Jenny Abbott Kitchings, Clerk of Court  
S.C. Court of Appeals 1220 Senate St. Columbia SC 29201  
Davidson and Lindeman, P.A. 11611 DeVonshire Dr.  
Second FL, P.O. Box 8568 Columbia SC 29202-8568

MR. JOHN BACUS # 127349  
LEE C. F. S. A164  
990 WAGAKY HWY  
BISHOPVILLE S.C. 29010-2021



THE HON. JENNY ABBOTT KETCHINGS CLERK OF COURT  
S.C. COURT OF APPEALS 1220 SENATE ST.  
COLUMBIA S.C. ~~29202-8568~~  
29201

PRIORITY LEGAL MAIL

RECEIVED

MAY 28 2015

LEE CHAMBER ROOM