

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF RICHLAND )

IN THE SOUTH CAROLINA COURT OF APPEALS

THE STATE, NIKKI R. HALEY, )  
BRYAN P. STERLING, ET AL )  
Respondent, )  
 )  
v. )

CASE NO. 2014-CP-40-2829  
APPELLATE CASE NO. 2015-000133  
MOTION FOR APPOINTMENT OF COUNSEL  
AFFIDAVIT

JOHN BACCUS )  
 )  
Appellant. )  
\_\_\_\_\_ )

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JUN 19 2015

SC Court of Appeals

PERSONALLY appeared before me, John BACCUS, who being duly sworn, deposes and says:

1. I am the appellant in the above captioned case.
2. I understand that I am entitled to an appeal of my conviction, and that, because I am

indigent, I am entitled to the assistance of an attorney from the ATTACHED EXHIBITS # E:

BELL LEGAL GROUP  
219 RENO STREET  
BEDFORD TOWN S.C. 29440

SOUTHERN CENTER FOR HUMAN RIGHTS  
83 POPLAR STREET, NW  
ATLANTA, GA. 30303

VANESSA ANN RICHARDSON, ESQ  
P.O. BOX 9055  
PAWLEYS ISLAND, S.C. 29585

THE RUTHERFORD LAW FIRM, LLC  
2113 PARK STREET P.O. BOX 1952  
COLUMBIA S.C. 29202

Mr John Baccus  
John Baccus  
LEP C.I. #5 A164  
990 WISALKY HWY.  
BISHOPVILLE, S.C. 29010

SWORN TO before me this \_\_\_\_\_  
day of \_\_\_\_\_, 2009.

\_\_\_\_\_  
(L.S.)  
Notary Public for South Carolina  
My Commission Expires: \_\_\_\_\_

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

**B** BELL  
LEGAL  
GROUP

*A Leading National Civil Litigation*

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

PAGE 2 OF 6

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)

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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.

PAGE 3 OF 6



*Vanessa Ann Richardson, Esq.*

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

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

PAGE 4 OF 6

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

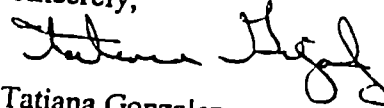
John Baccus #187393  
McCormick C.I. F 2 148  
386-Redemption Way  
McCormick, SC 29899

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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- LEGAL ACTION
- CIVIL RIGHTS MEMORIAL
- TEACHING TOLERANCE
- TOLE



# Contact

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## the Southern Poverty Law Center

- Trying to contact the Intelligence Project?
- Trying to contact our Legal Department?
- Interested in Gift Planning?

By Phone 334.956.8200

By Mail 400 Washington Avenue Montgomery, AL 36104

POB 2087

36102-2087

\* = Required Fields

Title  Select One

\* First Name

MI

\* Last Name

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Yes  No

*If you are a contributor, please list the name of any other person (a spouse, etc.) that may have jointly contributed with you.*

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Last Name

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City

State  Pick a State

Zip

Country  United States

Home Phone

\* E-mail address

**Would you like to learn more about the Center?**  
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Date: JUNE 15TH 2015

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CERTIFICATE OF SERVICE

\*\*\*\*\*  
AFFIDAVIT OF SERVICE

I certify that on JUNE 15TH 2015, 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]: MES / OPG PLUS COVER LETTER

Signature: Mr. John Buccino

South Carolina Court of Appeals  
Jenny Abbott Kitchinas Clerk.  
Post Office Box 2716 29  
1015 Sumter St.  
Columbia SC 29 201  
402

ORIGINAL

South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
Post Office Box 11624  
Columbia, S.C. 29211

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JUN 19 2015

SC Court of Appeals

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

RE: MOTION FOR APPOINTMENT OF COUNSEL

Dear Ms. Kitchings:

Please find The original And A Copy Each Of The Appellants' Exhibits # E Motion For Appointment of Counsel Affidavit For A clocked-in stamped, filed copy returned TO Appellant, To Demand The State of South Carolina Commitment Holders Respondents In The Above Matters, And Declare Speedily Unto Appellant Why Appellant Should Not Be Forced To Choose Between Having The Appointment of Counsel, Exculpation And Impeachment Transcripts And Video Tape... Because The State Of S.C. Commitment Holders Respondents Refusal To Make An Independent Determination That Immates [Appellant] IS Legally Committed To The Institution Prison System Authorities Jurisdiction, And To Utilize ITS CASE TRACKING Device TO CLASSIFY CAJL OF APPELLANTS CASES STEMMING FROM CASE NO. 2000-GS-33-004 AS A "HIGH PRIORITY" TO SECRETLY AND Pretextually For Discriminatory Reasons Hide, Induce And Subject CAJL APPELLANTS "JUDICIAL PROCEEDINGS" BY THE COURTS AND AGENCIES TO "JUDICIAL INELIGIBLE" OR "PREJUDGEMENT" TREATMENTS, CAJL WITHOUT NO (NIL) DUE PROCESS OF LAW WHATSOEVER?

Respectfully submitted,  
LSI

Mr. John Baculis  
and John Baculis  
LEP C.I. F 5 A164  
990 WILCKY HWY  
BISHOPVILLE, S.C. 29010

cc: D.O.S.

MR. JOHN BACCUS # 187393  
4460 BROAD RIVER ROAD  
B. R. C. T. MAR. 255  
COLUMBIA, S.C. 29210

COLUMBIA SC 290

17 JUN 2015



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JUN 16 2015

BRITNEY BOWES

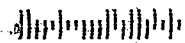
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JUN 19 2015

SC Court of Appeals

SOUTH CAROLINA COURT OF APPEALS  
JENNY ABBOTT KETCHINGS, CLERK  
POST OFFICE BOX 11629  
COLUMBIA S.C. 29211

29211162929



**LEGAL MAIL**

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LEE CI MAIL ROOM