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JUL 09 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

John D. McLeod, Administrative Law Judge

Case No. 14-ALJ-22-454-AP

CHARLES E. STUBBS,

Appellant,

v.

SOUTH CAROLINA
DEPARTMENT OF
EMPLOYMENT AND
WORKFORCE AND JSE
LLC,

Respondents.

**CERTIFICATE AND
MOTION TO PROCEED *IN FORMA PAUPERIS***

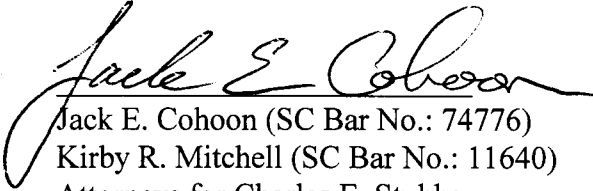
The Appellant, Charles E. Stubbs, by and through his undersigned counsel, would show that he is indigent and qualifies for assistance through South Carolina Legal Services pursuant to Rule 3(b)(2), S.C.R.C.P. Moreover, the imposition of a filing fee is prohibited by S.C. Code § 41-39-30, which states, in relevant part, that “an individual claiming benefits may not be charged a fee in a proceeding under Chapters 27 through 41 of this title...by a court or an officer, except an attorney, of it.”

The Appellant respectfully requests that this appeal be filed without cost.

July 9, 2015

WE SO MOVE:

SOUTH CAROLINA LEGAL SERVICES

A handwritten signature in black ink that reads "Jack E. Cohoon". The signature is written in a cursive style with a horizontal line underneath the name.

Jack E. Cohoon (SC Bar No.: 74776)

Kirby R. Mitchell (SC Bar No.: 11640)

Attorneys for Charles E. Stubbs

2109 Bull Street

Columbia, South Carolina 29201

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PROOF OF SERVICE

I certify that I have served the Notice of Appeal and *In Forma Pauperis* Certification on Respondents S.C. Department of Employment and Workforce and JSE, LLC by depositing copy of them in the United States mail, postage prepaid, on July 9, 2015, addressed to their counsel or designated representative as follows:

Mara Dawson Baker, Esq.
Legal Dept.
SC. Dept. of Emp. and Workforce
P.O. Box 8597
Columbia, SC 29202

JSE, LLC
c/o Theresa Rhodes
5000 Thurmond Mall
Suite 114
Columbia, SC 29201


Jack E. Cohoon

Attorney for Charles E. Stubbs
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**South Carolina
Legal Services**

Balancing the Scales of Justice
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SC Court of Appeals

July 9, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

BY HAND DELIVERY

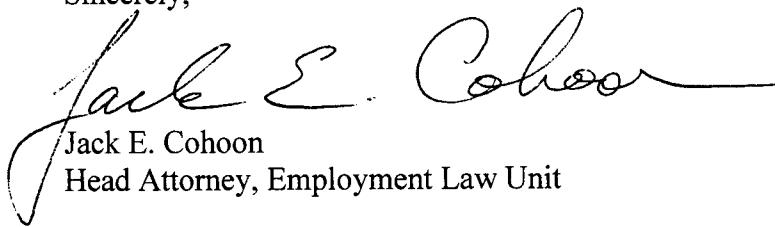
Re: Charles E. Stubbs v. South Carolina Department of Employment and Workforce and JSE,
LLC; Case No.: 11-ALJ-22-0654-AP
Our File No.: 12-0595095

Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal in the above case. Also enclosed are the following:

- (1) Proof of Service of the notice of appeal on the Respondents;
- (2) A copy of the Order which is to be challenged on appeal; and
- (3) A Certificate and Motion to Proceed *In Forma Pauperis*.

Sincerely,



Jack E. Cohoon
Head Attorney, Employment Law Unit

Enclosures

Cc: Maura Dawson Baker, Esq.
Legal Dept.
SC. Dept. of Emp. and Workforce
P.O. Box 8597
Columbia, SC 29202

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