

STATE OF SOUTH CAROLINA  
In The Court of Appeals

APEAL FROM THE ADMINISTRATIVE LAW

RECEIVED

John D. McLeod, Administrative Law Judge

JAN 25 2016

Case Docket No. 15-ALJ-22-0204-AP

SC Court of Appeals

Bobby Smith

Appellant,

v.

South Carolina Department of  
Employment and Workforce  
and Greenwood Mills Inc.

Respondents,

Appellate Case No. 2015-002631

MOTION REQUESTING APPOINTMENT OF COUNCIL

I certify that I am the Appellant (Bobby Smith) in the above-captioned matter, do hereby swear that I am unable to retain Council of said proceeding therefor, that I believe I am entitled to redress, and that I am unable to litigate to obtain a fair case on my own behalf because of lack of trained knowledge in Brief writings and Court proceedings. I further, am unsuccessfully able to hire an Attorney after requesting them for the case. I respectfully request this Court to appoint me Council at the full expense of my own, allowed by regulated State Law.

In support of this motion, Appellant states that I have made a diligent effort to employ Council and contacted the following Attorneys:

- Scarlet Moore, Greenville SC
- Rauch Wise, Greenwood SC
- Carson Henderson, Greenwood SC
- Andrew Hodges, Greenwood SC
- Jamison Tinsley, Greenwood SC
- Michelle Powers Greenwood SC
- Alex Paterra Greenville SC
- Joshua Nasrollahi Greenwood SC

In support of this motion, Appellant states that I have made a diligent effort to obtain the assistance of Council by contacting the following legal aid organizations, lawyer referral services and pro bono attorneys:

- Frank Cannon, South Carolina Legal Services in greenwood SC
- SC Appleseed Legal Justice Center, Columbia SC

In further and final support of this motion, I firmly believe that I cannot possibly whatsoever retain Council on my behalf because the SCDEW dictates how much an attorney can charge in unemployment cases under **S.C. code Ann. § 41-39-30**. It is obvious, Attorneys will not represent me for this small fee dictated by SCDEW in this Court. I humbly pray and beg to this Court to appoint me an attorney.

I understand that making this application does not excuse me from litigating my case, and that it is still my responsibility to move forward in this proceeding.


I declare that my answers to the forgoing are true and correct.

Todd Timmons  
Office of General Council, SCDEW  
PO Box 8597  
Columbia, SC 29202  
Attorney for Respondent: SCDEW

South Carolina Administrative Law Court  
Attention to: Clerk of Court  
1205 Pendleton Street, Suite 224  
Columbia, SC 29201

M. Lee Daniels, Jr.  
1200 Woodruff Road  
Suite A-3  
Greenville, SC 29607  
Attorney for Respondent: Greenwood Mills Inc.

January 20, 2015

  
Bobby Smith  
613 Davis Street  
Greenwood, SC 29646  
Pro Se Appellant

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 Employment and Workforce )  
 and Greenwood Mills Inc. )  
 )  
 Respondents, )  
 )

CERTIFICATE PROOF OF SERVICE


I hereby certify that I am the Appellant (Bobby Smith) in the above-captioned matter and that on the 20th day of January, 2016, in Greenwood, South Carolina, I served a copy of the forgoing Motion Requesting Appointment of Council, on the following person(s) by depositing the same in the United States Mail, postage paid, and addressed as follows:

Todd Timmons  
Office of General Council, SCDEW  
PO Box 8597  
Columbia, SC 29202  
(803) 737-2666  
Attorney for Respondent: SCDEW

South Carolina Administrative Law Court  
Attention to: Clerk of Court  
1205 Pendleton Street, Suite 224  
Columbia, SC 29201  
(803) 734-0550

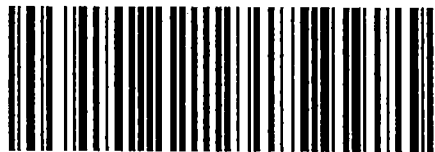
M. Lee Daniels, Jr.  
1200 Woodruff Road  
Suite A-3  
Greenville, SC 29607  
(864) 242-9484  
Attorney for Respondent: Greenwood Mills Inc.

January 20, 2016

  
Bobby Smith  
613 Davis Street  
Greenwood, SC 29646  
(864) 724-4712  
Pro Se Appellant

**CERTIFIED MAIL**

**B. Smith  
613 Davis Street  
Greenwood S.C. 29646**

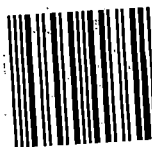


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JAN 25 2016

SC Court of Appeals Judge

South Carolina Court of Appeals

← JENNY ABBOT KITCHINGS, ~~CLERK~~ → To: Judge

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