

Johnny Lawrence #232835
Evans Cor. Inst
610 Highway Nine West
Bennettsville, S.C. 29512

RECEIVED

MAR 24 2016

SG Court of Appeals

South Carolina Court of Appeals
Jenny Abbott Titchings, Clerk
P.O. Box 11629
Columbia, S.C. 29211

Dear Ms. Titchings

This petition may be irregular, but my situation is out of the ordinary. My mail to federal district court and the VA department, are being taken before I can receive them. The warden, at this prison is in total control nothing happens without his approval. He does not want me to receive any assistance from the district court. Nor does he want me to receive my veteran benefits, for then I may be able to hire a attorney. These things have been going on for a long time. My access to his supervisors is near impossible, my family is under threatening if they help me. If I please this court to grant this petition it would go a long way to proving that the courts are always open and that one can have a day in court. I will stop here. I must declare that what I have stated are the true facts under penalty of perjury 28 U.S.C. 1746. Johnny Lawrence does so state. I am mindful that this is a court of appeal, but there is no other means of getting some of this information out from this place.

Respectfully Submitted

Sincerely Always
Johnny Lawrence 232835
Evans Correctional Inst
610 Highway Nine West
Bennettsville, S.C. 29512

March 03-22-2016

10
The State of South Carolina
South Carolina Court of Appeals

Appeal From Administrative Law Court

The Honorable, Ralph King Anderson III, Chief Judge

Appellate Case No. 2016-00123

Johnny Lawrence #232835

RECEIVED
Appellate
MAR 24 2016

vs

South Carolina Department of Probation,
Parole and Pardon Services

SC Court of Appeals

respondent

Affidavit in Support of Granting Jurisdiction

I state and declare the following facts:

- ① Tifton, March 07-2016, I received and p.c. to report to the mailroom on, March, 08-2016, to pick up legal mail. When I got to the mail room, I was told that, Ms. Baker, had my legal mail and that she was out. I when to the mail room on, March-10-2016, was told that, Ms. Baker, would return on, Monday, March 14, 2016, when to mailroom, was told, that there was NO legal mail and before I could ask what happened, was told to get a-way from there, now?
- ② I filed a grievance it was returned saying I fail to informally resolve, the matter by speaking with one of the associate warden?
- ③ This is the third time that mail legal was tampered with the two other times documents that should have been taken out of mail and the warden, would not give them to me.
- ④ No one will admit that I have mail legal that is being kept from me illegally. There are witnesses that heard, the mailroom person say that Ms. Baker, had my legal mail.
- ⑤ There have been several times that I expect legal mail and it

never come and if I write again still I get no response!

⑥ There is no way for me to call these courts and agencies of state and federal government to find out if they sent any or such a response?

⑦ This is not about ^{going}outing mail, but is a true problem, one time it took a letter 12 days from this prison mail to the Supreme Court of South Carolina.

⑧ These are mail coming from governmental agencies, so why is my mail be hidropped, by prison authorities without any reason, clearly unlawful and illegal conduct. They have delayed mail from this court. What will I do if they decision that this court may allow me to see, what they have done to my prison record? I may never receive that also. Clearly unlawful and illegal conduct. This court is in a position to do nothing on stop crime and cover-ups.

That the foregoing are the true facts as I have come to know them to be under penalty of perjury pursuant to, 28, U.S.C. 1746, I,

Johnny Lawrence Voted 03-22-2016

Johnny Lawrence #232835
Evans Correctional Inst
610 Highways N.W. & West
Bennettsville, S.C. 29517

Voted
March 22-2016

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The State of South Carolina
South Carolina Court of Appeals

Appeal From: Administrative Law Court
The Honorable, Ralph King Anderson III, Chief Justice

RECEIVED

Appellate Case No. 2016-00179

MAR 24 2016

Johnny Lawrence #232835

vs

Appellate SC Court of Appeals

South Carolina Department of Probation, Parole
and Pardon Services

respondent

EX PARTE, Petition For Order To Show Cause
And Temporary Restraining Order (Injunction)

Upon this petition, supporting Aff. doct and memorandums of law
submitted here with, it is ordered that defendants, warden, Willie
Eggleston, E.C.I, and mailroom, Super. Ms. Porter, Show cause, in
to answer to this petition, which is herewith served upon you upon
suaort to rule 4, S.C.R.C.P., within 20 days exclusive of the day of service
on as the Court may direct. If you fail to do so, judgment by default
will be taken against you. Relief requested (preliminary injunction should
not issue pursuant to rule 65 S.C.R.C.P., enjoining the defendants, their suc-
cessor, in office, agents and employees and all other persons acting in
concert and participation with them, from, open, taking or concealing and
delaying deliver of all legal privilege mailed addresses to petitioners/opponent
105 cases done recently and in the past.

It is Further Ordered that effective immediately and pending
the hearing and determination of this Order to Show cause, the def-
endants, warden, Willie Eggleston, E.C.I, and ms. Porter, mailroom, super,
against whom this petition is against and each of their officers, agents
employees and all other persons acting in concert or participation with
them are restrained from concealing, stealing, hiding, taking of any

and each of their officers, agents, employees and all other persons acting in concert or participation with them are restrained, from conceal-
ing, stealing, hiding, taking or any other way interfering with or
persecuting

Date

The State of South Carolina

South Carolina Court of Appeals

RECEIVED

JAN 24 2016

SC Court of Appeals

Appeal From: Administrative Law Court

The Honorable, Ralph King Anderson III, Chief Judge

Appellate Case No. 2016-000179

Johnny Lawrence #237835

Appellant

vs

South Carolina Department of Probation, Parole
and Pardon Services

Respondent

Memorandum of Law, in Support of Granting, in Part, of,
Appellant's, Petition for Writ of Habeas Corpus

Jurisdiction:

Modern Finance Co. - v - Hicks, 235 S.C. 217, 110 S.2d 859

"The Supreme Court (Court of Appeals) is and should be primarily concerned with appellate matters; it should not exercise original jurisdiction in matters cognizable in the circuit courts except when necessary in the public interest or because of emergency or for some other compelling reason". "The Supreme Court may entertain original petition for - and injunction" *Calmer - v - Harriett* 57 S.C. 166, 35 S.C. 52 (1900)

"Judicial protection of prisoner's rights, where there is a restriction upon a prisoner's constitutional rights of - or right to access to the - courts, the prisoner is entitled to judicial protection of his rights" *Queen - v - South Carolina Dept. of Correction*, 307 S.C. 841

See, section 14-3-320 equitable matters: *Ex parte Mack* 15 S.C. 322 (1888). The remedy of an injunction is a drastic one and should be cautiously applied only when legal rights are unbreachably invaded or legal duties are willfully or wantonly neglected" *LeFungy - v - Long Cove Club Owners Assoc. Inc.*

313 S.C. 555 443 send 577, 578. "A petition for writ or other writ is not a cause of action but a form of remedy or relief" Pleam Creek Develop. Co. Inc. v City of Emery 334 S.C. 30, 36, 512 S.E.2d 106, 109, 1999
 "mail from state's Court privileged and confidential" Conte v Fenton
 440 F. Supp 1161-1163. "Hearing rules regarding delivery within 24 hrs
Sherman v McDougall 656 F.2d 577. That's S.C.D.C. policy that all legal mail shall be delivered within 24 hrs.

② Whether the party will suffer irreparable injury in the balance of hardship between the parties. Irreparable injury is threatened as a matter of law, the continuing deprivation of constitutional rights constitutes irreparable injury. Elnoch v Burns 427, 45, 347, 38 96 S.Ct. 2673. "The relief sought will serve the public interest already in public interest for prison officials to obey the law" D. v Arroyo 642 F. Supp 510 527. "Respect for law particularly by officials responsible for the administration of the state's correctional system is in itself a matter of the highest public interest. The Constitution is the ultimate expression of the public interest" Llewellyn v Oakland County Prosecutor Office 402 F. Supp 1379, 1383. U.S.

Constitution, Amend. 1, - "to petition the Government of a redress of grievances."

Why injunction should not wait for hearing ① I was deprived of my legal mail

② It was not intended that I find out about this ③ that this has happened to my knowledge ③ times and more probably than not many more times in the past. I have write to the district Court two times but have not even received a response. There is no way of colling to finding out and private person will not be given that information.

Finally. When as in this situation when prison officials allegedly steal legal mail and cover up. When they control all access to the outside world

when they become a carrier, and have shown a ruthlessness, with no respect even for the law that enforces them? This is shocking that in this day in this country such a monstrous thing can exist. "Finding - violation where the officer's purpose was to cause harm unrelated to a legitimate objective because it satisfied the elements of ambition, less shocking to the conscience" County of Sacramento - v Lewis 523 U.S. 833 118 S.Ct. 1708 140 L.Ed.2d 1043

"The Court held that since prison officials, in inspecting incoming mail outside the inmate's presence are provided with an opportunity to obtain advance warning of potential litigation, which might involve the prison and more significantly could become privy to strategies being formulated between attorney and client with regard to pending litigation, the inmate is entitled to be present during the opening of large mail addressed to him." Beck - v Illinois 504 F.2d 1120. There was no reason given for these illegal conduct except that it is done under the color of law. The, this court is empowered to do justice. This court should grant the injunction.

The foregoing are the three facts as I have come to know to be under penalty of perjury sworn to. 28 U.S.C. 31746.

J. Johnny Lawrence

Date: 03-27-2016

Respectfully Submitted
Petitioner For Writ

Johnny Lawrence #232835
El Paso Correctional Inst.
610 Highway 119 West
Berndtsville, TX 79512

March 20, 2016

State of South Carolina
South Carolina Court of Appeals

RECEIVED

MAR 24 2016

SC Court of Appeals

Appeal From Administrative Law Court

The Honorable Ralph King Anderson III, Chief Judge

Appellate Case No. 2016-000179

Johnny Lawrence #232835

Appellant

vs

South Carolina Department of Probation, Parole
and Pardon Services

Respondent

Practitioner of Law

I declare that I have mailed a copy, Petition for Expedite Hearing, memorandum of law and Affidavit for Injunction against named individuals to, South Carolina Court of Appeals, Jenny Abbott Hutchings, Clerk, P.O. Box 11629, Columbia, S.C. 29211-0629, Mr. Tommy Ewens Jr., P.O. Box 50666, Columbia, S.C. 29250, and to South Carolina Dept of Cor. Office of General Counsel, P.O. Box 21787, Columbia, S.C. 29221-1787, by depositing in the mail room, at Ewens C.J., 610 Highway Nine West, Bennettsville, S.C. 29512, properly addressed with sufficient postage, this being proper service, under penalty of perjury pursuant to 28 U.S.C. 31746, I, Johnny Lawrence
Date 03-22-2016

Johnny Lawrence #232835

Ewens Court, Just.

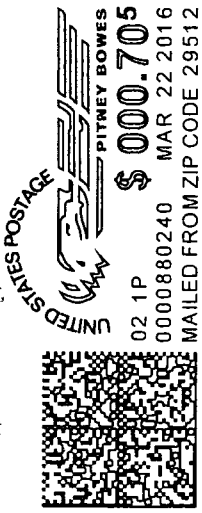
610 Highway Nine West

Bennettsville, S.C. 29512

Date 03-22-2016

Johnny Lawrence #232835
Evens Correctional Instn
610 Highway NW - West
Bennettsville, S.C. 29812

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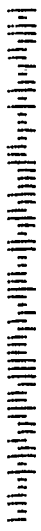
South Carolina Court ~~Records~~ **ED**
The Honorable, Jenny Abbott, Kitzinger, Clerk
MAR 24 2016

P.O. Box 116229
Columbia, S.C. 29211

SC Court of Appeals

LEGAL MAIL USE ONLY

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S.C. DEPARTMENT OF CORRECTIONS