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PETITIONER'S MOTION FOR LEAVE OF COURT TO FILE TABLE OF CONTENTS AUTHORITIES AS TIMELY AND TO FILE SUPPLEMENTAL RECORD

SC SUPREME COURT

THE STATE OF SOUTH CAROLINA IN THE SUPREME COURT

APPEAL FROM GREENVILLE COUNTY

COURT OF COMMON PLEAS

DANIEL D. HALL, CIRCUIT COURT JUDGE

LOWER COURT CASE NO. 2014-CP-23-01893

APPELLATE COURT CASE NO. 2015-002251

George Cleveland III,

S.C.D.C. NO. 35770,

PETITIONER

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

PETITIONER'S OMNIBUS MOTION

OFFICE OF THE ATTORNEY GENERAL KAREN C. RATTIGAN, Senior Asst. Dep. AG. P.O. Box 11549 Columbia S.C. 29211-1549 (803) -734-3970 Attorney For DEFENDANT

George Cleveland III #35770 TURBEVILLE CORRECTIONAL INST. P.O. Box 252 Turbeville, S.C. 29162 PRO SE Litigant

1.

PETITIONER'S OMNIBUS MOTION:

MAY IT PLEASE THE COURT: George Cleveland, III, the Petitioner, proceeding pro se in this P.C.R. Action respectfully moves this court for leave of court to FILE my TABLE OF AUTHORITIES AND TABLE OF CONTENTS AS TIMELY, so that the documents are attached to my FILED PETITION FOR A WRIT OF CERTIORARI IN POST CONVICTION RELIEF on the following grounds:

DENIAL OF ACCESS to the COURTS, AND leave of court to request this court GRANT my motion to Supplement Record under Rule 212 (b) without the consent of the state AND prior to arguments commencing in this case.

2..

TURBEVILLE CORRECTIONAL DENIED ME ACCESS TO THE COURTS:

with the deadline to file my petition for a writ of certiorari in post conviction relief was: MARCH 21, 2016 (Monday), I started preparing my legal documents

1.

ON MARCH 18, 2016 (FRIDAY), but my cell room light stopped working MARCH 19, 2016¹. (SATURDAY),

The cloud-cover on this day, id, And even Sunday made it impossible for me to see, furthermore, around 12:30 p.m., on MARCH 20, 2016 (Sunday), I started requesting from the officer-in-charge of my dorm: Sgt. TOLLINSON to call CAPTAIN PACK (SHIFT CAPTAIN ON B-1 shift) to seek permission for me to use my dorm's day room², this room had light, And empty because all inmates were locked behind their cell-door, P. R. 1 AT PAR. 3.

Sgt. TOLLINSON stone-walled much of the afternoon despite repeated request, he claimed he called around 5:00 p.m. but could not reach CAPTAIN PACK over.

1. My dorm was on lock-down on this day until Monday (3-21-2016) P. R. 1 AT PAR. 2 (Supporting Affidavit).

2. The dayroom is a room in my assigned dorm with tables and chairs for multi-purposes.

the phone or on the radio. R.P. 1. At PAR. 4, I did not believe: An correctional officer had difficulty communicating with the shift captain or at least multiple other officers who worked in the prison operational office that day, id. At Turbeville Correctional Institution, so I started the grievance process by sending the facts, and an copy of the court order from this court which granted my motion for an extension to file my petition until March 21, 2016. R. P. 2 At PAR. 5. I'm awaiting an response from MAJOR CHVALA³. I informed MR. Sherouse (clerk of this court) that I would file my TABLE of Authorities and TABLE of contents by MARCH 25, 2016.

Unforeseen time was spent on multiple other

³. MAJOR CHVALA is over security here at Turbeville Correctional.

legal deadlines and legal filings consumed my time:

George Cleveland, III v. Chief Lindsey Owens, et al., U.S. Dist Court (GA. NE. DIV.)
CA. 2:15-cv-00168-WCO-JCF;

George Cleveland, III v. Greenville County Sheriff's Office, Appellate Court Case No. 2016-000498 (S.C. Supreme Court);

George Cleveland, III v. WARREN WILLIE Egleton, et al., U.S. Dist. Court (S.C. Dist) CA No. 4:14-2444-RBH-TER.

Yet another prison-lock-down from April 01-05, 2016 slowed my legal work down as well, in large part, due to my lack of legal paper, and no way to request, and receive paper while on lock-down. R.P. 2 at PAR. 6. The multiple prison-locks, inadequate legal paper, no cell-light, and the stonewalling by Sgt. Tollinson caused me to

miss the MARCH 21, 2016 Deadline to file with my ALREADY FILED certiorari petition, id's the TABLE of Contents, AND TABLE of Authorities in violation of my First Amend. (Access to the courts) under the U.S. CONST., AND Lewis v. Casey 518 U.S. 343, 116, S.Ct. 2174, U.S. ARIZ. (1996), id's at 2178-2179. (Supreme Court of the United States held an inmate must suffered actual prejudice by prison officials in order to have standing), consequently, I have standing to request that the TABLE of Contents AND TABLE of Authorities attached hereto be filed AS timely, AND be attached to my ALREADY FILED Petition FOR A WRIT OF CERTIORARI IN Post-Conviction Relief in this Court respectively.

3.
SUPPLEMENTAL-RECORDS:

Finally, the eight-four (84) pages in the attached Supplemental Record are all relevant to my FILED P.C.R. PETITION AND FILED APPENDIX because they all further piece together A CULTURE AND PATTERN OF

Judicial And Prosecutorial-misconduct,

EX-PARTE COMMUNICATION between JUDGE HALL (P.C.R. Judge) AND Ms. RATIGAN (S.C. Asst. Att. Gen.) regarding the RUBBER-STAMPING of my P.C.R. Application; id; AT p. 5-18.

Proposed order of Dismissal of my P.C.R. which is identical to the filed order of Dismissal which shows AN STRICKLAND v. WASHINGTON 466 U.S. 668, 104 S.Ct. 2052, 80 L.Ed. 2d 674 (1984) violation because NONE OF my specific issues were Addressed; 19-26.

Letter from Appellate Defense which ARE Relevant to the FLAWED legal Advice; id; AT pp. 35, 39; AND

GRAND JURY REPORTS of Greenville County for five (5) convening dates in 2013 which ARE Relevant because of the wide-spread-pattern of with hundreds of INDICTMENTS in just eight (8) hours

ON AN SINGLE DAY, id., AT PP. 42-84..

All the Additional Documents Attached in the Supplemental Record shed Additional evidence of wide-spread corruption, misconduct, intentional Federal and state constitutional violations against me and other defendants that has destroyed the Administration of Justice in South CAROLINA, and this Additional evidence proves it; Accordingly all Supplemental Documents in the Supplemental Appendix are relevant to my P.C.R. case, and my misconduct Arguments.

4.
CONCLUSION:

I PRAY FOR the following relief:

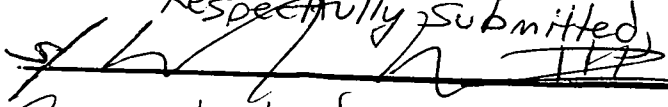
WHEREFORE; GRANT my omnibus motions of:

FILING MY TABLE OF CONTENTS AND TABLE OF AUTHORITIES AS timely, and ATTACH them, id., to my FILED PETITION FOR A WRIT OF CERTIORARI IN

my P.C.R. case.

FILE the 84-page supplemental Record to my
ALREADY FILED ORIGINAL Appendix in this instant
P.C.R. case Appellate case No. 2015-002251,

Any other Relief this COURT deems just, proper,
and/or equitable.

Respectfully submitted,

George Cleveland III, #35770, TA118
TURBEVILLE CORRECTIONAL INST.
P.O. Box 252
TURBEVILLE, S.C. - 29162

8.

DATED: APRIL 08, 2016

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PETITIONER'S PROOF OF SERVICE APR 14 2016

BC SUPREME COURT
THE STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

APPEAL FROM GREENVILLE COUNTY

COURT OF COMMON PLEAS

DANIEL D. HALL, CIRCUIT COURT JUDGE

LOWER COURT CASE NO. 2014-CP-23-01893

APPELLATE CASE NO. 2015-002251

George Cleveland, III, PETITIONER
S.C.D.C. NO. 357770,

v.

STATE OF SOUTH CAROLINA, RESPONDENT.

PETITIONER'S PROOF OF SERVICE

George Cleveland, III #357770
TURBEVILLE CORRECTIONAL INST.
P.O. BOX 252
TURBEVILLE, S.C. 29162
PRO SE LITIGANT.

PETITIONER'S PROOF OF SERVICE:

APPELLATE CASE NO.

2015-002251

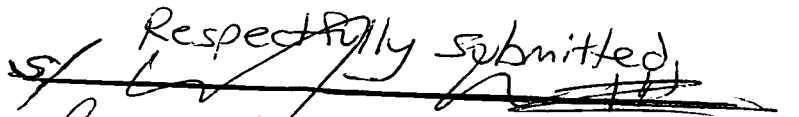
I, George Cleveland III, proceeding pro se served on the Respondent, by and through the Turbeville Correctional Institution's mail room staff properly addressed, and with proper United States Postage the following legal documents on the date below:

PETITIONER'S MOTION FOR LEAVE TO HAVE TABLE OF CONTENTS AND TABLE OF AUTHORITIES, AND SUPPLEMENTAL RECORD TO BE FILED 8-PAGES;

SUPPLEMENTAL RECORD. - 84-PAGES

AND SUPPORTING AFFIDAVIT 3-PAGES

Respectfully submitted,



George Cleveland III # 357770

TURBEVILLE CORRECTIONAL INST.

P.O. Box 252

TURBEVILLE S.C. 29162

DATED: APRIL 11, 2016