

STATE OF SOUTH CAROLINA
COURT OF APPEALS

No. 2016-000551

Timothy Dale Crckett Appellant,

VS.

South Carolina Dept. of Corrections ... Appellee/
Respondent,

ON Appeal From The Administrative
Law Court, Richland County
Hon. Judge D. B. Durden
L/C No. 16-ALT-04-0069

APPELLANT'S PRO SE MOTION FOR
APPOINTMENT OF COUNSEL

COMES NOW, Timothy Dale Crckett, with assistance
of fellow prisoner, and respectfully moves before
the Honorable Court pursuant to Rule 608, SCRAP,
requesting appointment of counsel to assist

(1)

D.C.
LEGAL MAIL

The vision impaired (blind) Appellant with the litigation of this appeal.

For **GOOD CAUSE** in this Court granting such extraordinary relief the Appellant would aver as follows:

- (1) The issues on appeal are meritorious and relate to a prisoner's fundamental constitutional due process rights and visitation privileges;
- (2) The lower court's decision is erroneous and affects Appellant's substantial rights;
- (3) The appeal presents at least two (2) important procedural questions that should be addressed and conclusively ruled upon by the Court of Appeals to guide lower court's decisional process;
- (4) The Appellant is blind and should be given assistance to access the courts as a basic public right of access under the American with Disabilities Act (ADA);
- (5) The Clerk of Court has already exhausted

(2)

T. D. C.
3/21/16
LEGAL MAIL

unnecessary court resources notifying the Appellant as to basic procedural and pleading deficiencies which threaten to have Appellant's right to appeal violated.

(6) Fundamental Fairness and Due Process of the Law would best be served by this Court granting relief and assigning a pro bono attorney to help the Appellant with this case.

Respectfully prayed for this ~~day~~ ^{20th} day of MARCH 2016.

Timothy Dale Crockett
Timothy Dale Crockett
SCDC # 200598
Appellant, Pro Se

"CERTIFICATE of SERVICE"

I, Timothy Dale Crockett, hereby state that I have served and mailed/Filed this motion by depositing same with the prison legal mailroom staff addresses as follows:

S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

SCDC / General Counsel
4444 Broad River Rd.
Columbia, SC 29210

Done this 20th day of MARCH 2016. TDC

LEGAL MAIL

MARCH 27, 2016

S.C. Court of Appeals
Clerk of Court
P.O. Box 11629
Columbia, SC 29211

Timothy Dale Crockett
#200598
Broad River Corr Inst
4460 Broad River Rd
Columbia, SC 29210

RECEIVED

MAR 29 2016

Re: Timothy Dale Crockett vs SCDC SC Court of Appeals
Appeal No. 2016-~~000598~~
000551

Dear Honorable Clerks:

This letter will acknowledge receipt of the court's second deficiency letter dated 3-22-16 advising Appellant to file motion for transcripts within (10) ten days. (There are no transcripts to order)

First, let the record reflect that Appellant is a "blind" inmate at Broad River corr. Inst. and consequently substantially handicapped. He will be inquiring with prison law library staff and/or prison officials about accessing the courts with some help under the American with Disabilities Act (ADA).

The Appellant has already responded to one deficiency letter and filed an "Amended Notice of Appeal". There was no hearings in the lower court and therefore no transcripts to "order." So there

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Can not be any method or time to order the transcripts that don't exist. Moreover, the Court should notify the Appellant as to any deficiencies in his pleadings/appeal at one time. Hopefully the Court can process Appellant's appeal and grant him the judicial due process he is entitled to and was denied in the lower court.

Finally, the Appellant has enclosed a "Motion to Appoint Counsel" with the hopes that a member of the Bar could be appointed to assist the disabled Appellant.

Thank you for your time + concern in this matter.

Respectfully

Timothy Dale Crockett
Timothy Dale Crockett
Appellant, Pro Se

Attachments
cc: Retained

T.D.C.
LEGAL MAIL

Timothy Dale Cruckett
#200518 - Mont. 147
Broad River Comm Inst
4460 Broad River Rd.
Columbia, SC 29210

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MAILROOM

S.C. Court of Appeals
Office of the CLERK of Court
P.O. BOX # 11629

COLUMBIA, SC
29211

LEGAL MAIL

APPEAL #
2016-000551