

SUPREME COURT of SOUTH CAROLINA

STEVEN LOUIS BARNES # 327117  
petitioner

VS

SOUTH CAROLINA COURT of APPEALS  
Respondents

RECEIVED RECEIVED

FEB 01 2018

FEB 01 2018

SC Court of Appeals

S.C. SUPREME COURT

SECOND WRIT of MANDAMUS  
AGAINST THE SOUTH CAROLINA  
COURT of APPEALS

SUMMARY of FACTS

This second writ of Mandamus against the South Carolina Court of Appeals is in regards to this Court December 15, 2017 order that states in part:

"petitioner is reminded that the only motion that he can file related to this matter is a motion to Relieve Counsel. As long as he is represented by Counsel in this matter, any other motion or other document seeking relief above and beyond the relief of Counsel will not be accepted by either this Court or the Court of Appeals.

see Barnes v SC Dept of Correction, Appellate case # 2017-002505

The petitioner is requesting this Court to Compel and to enjoin the Court of Appeals to hear the petitioner motion for Rehearing and for Rehearing En Banc regarding the Court December 21, 2017 denial of the petitioner motion to Relieve Counsel and the grounds of ineffectiveness of Counsel in which is associated with the motion. See Appendix (P)

The petitioner base this motion on the following grounds :

### FACTS

on september 29, 17, the petitioner had filed an one hundred page brief, in this Court and the Court of Appeals, in regards to both the contested hearing Counsels in the Administrative Law Court and the Court of Appeals Counsels ineffectiveness of pursuing his issues in those Courts. On november 22, 2017, the petitioner had filed his first writ of Mandamus against the South Carolina Court of Appeals, and among others, for depriving the petitioner access to the Courts, and conspiracy with state officials in depriving the petitioner of a cause of action, and among other grounds. That same week, the clerk of this Court would not file the petitioner first writ of Mandamus because of the doctrine of hybrid representation. The petitioner then filed both a Motion for Rehearing and for Reconsideration of the petitioner first writ of Mandamus and a Motion to Relieve and substitute Counsel in this Court and the Court of Appeals. In Retaliation because of the petitioner first writ of Mandamus, the clerk of

the Court of Appeals had sent the petitioner a letter on December 7, 2017, threatening to dismiss the petitioner appeal if he did not supply the Court a proof of service and twenty-five (25) dollars for processing his motion to Relieve Counsel; however, on December 15, 2017, this Court had instructed the Court of Appeals to only hear as stated above the petitioner motion to Relieve Counsel. Furthermore, although this Court December 15, 2017 order has completely closed the writ of Mandamus doors where Counsel who is appointed by the state of South Carolina to the petitioner is conspiring with state officials in intentionally depriving the petitioner of a cause of action not only in the Court of Appeals but also other South Carolina Courts, the petitioner is forced to file a writ of Certiorari in the United States Supreme Court within ninety (90) days of the Court order. On December 21, 2017 the Court of Appeals had denied both the petitioner motion to Relieve Counsel and his appeal of the Administrative Law Court proceeding under the mootness doctrine, although the Court of Appeals in part lack subject matter jurisdiction. Within fifteen (15) days of the Court order the petitioner filed a Motion for Rehearing and for En Banc hearing in the Court of Appeals regarding his motion to Relieve Counsel and the grounds of ineffectiveness of Counsel for Counsel conspiring, and among other grounds, with South Carolina officials in depriving the petitioner of a cause of action as to the three exception of the mootness doctrine. On January 8, 2018, the Court of Appeals had filed a Remittitur regarding the Administrative Law Court proceeding without hearing the petitioner motion

for rehearing and for hearing en banc of the petitioner motion to  
Relieve Counsel, and its grounds associated with the motion. on  
January 26, 2018, the petitioner had filed a Motion to Recall  
the Remittitur on the grounds of the above facts. see Appendix  
(1)

## JURISDICTION

This Court has Jurisdiction of this writ on the following South Carolina  
laws:

SC Const Art V § 5; SC Const Art V § 20; Rule 65 of  
the South Carolina Civil Rules of procedure; and SC Code § 14-3-310  
that reads in pertinent parts:

" The supreme Court shall have the power to issue writs or  
orders of Injunctive, mandamus . . . and other Remedial  
and original writs "

## CONCLUSION

The petitioner has a specific Constitutional Right to access to the  
Courts, see Lewis vs Casey 518 US 343 (1996) and the Right to  
put up a cause of action, see Logan v Zimmerman Brush Co.,  
455 US 422 (1982) and the Right to not have a Judge or Clerk

more capricious decision-making concerning the Rules of Court or the laws of South Carolina, and the right not to be punished by Court officials for exercising the petitioner's constitutional rights, see *Crawford et v Britton* 523 US 574, 585 n 10 (1998), and the right to procedural due process, see *Wolff v McDonnell*, 418 US 539 (1974), and among other rights. These rights are indisputable constitutional rights in which are ministerial to both the Court of Appeals and this Court.

Furthermore, the petitioner has an inadequate remedy in the South Carolina Courts as shown above.

Also, the petitioner is requesting this Court to enjoin and to compel the Court of Appeals and its agents in the petitioner first writ of Mandamus to stop playing with the petitioner and his constitutional rights.

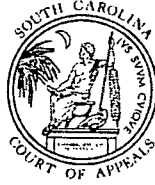
### RELIEF

The petitioner prays for such other and further relief this Court seems just and proper.

Date: 1/26/18

Steven Louis Brant  
STEVEN LOUIS BRANT #32717  
McCORMICK Correctional Institution  
386 Redemption way  
McCORMICK, SC 29899

APPENDIX (1)



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
www.sccourts.org

January 12, 2018

Steven L. Barnes, 327117  
Kirkland Correctional Institution  
4344 Broad River Road  
Columbia SC 29210

Re: Steven Barnes v. SCDC  
Appellate Case No. 2017-000967

Dear Mr. Barnes:

The Court received your motion for reconsideration and rehearing en banc. Because you are represented by counsel, the Court declined to act on your motion prior to sending the remittitur and we are returning your filings to you. *See Miller v. State*, 388 S.C. 347, 347, 697 S.E.2d 527, 527 (2010) ("Since there is no right to 'hybrid representation' that is partially pro se and partially by counsel, substantive documents, with the exception of motions to relieve counsel, filed pro se by a person represented by counsel are not to be accepted unless submitted by counsel.").

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jenny A. Kitchings".

CLERK

cc: Lake Eric Summers, Esquire  
Stephen Hollis Lunsford, Esquire  
Shane Edwin Goranson, Esquire  
William Sean McGuire, Esquire  
The Honorable Jana E. Shealy

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Administrative Law Judge

Case No. 15-ALJ-30-0318-AP

RECEIVED  
JAN 08 2018  
SC Court of Appeals

South Carolina Department of  
Collections, and et. Al

Respondent

Steven Louis Barnes

Appellant

MOTION for RECONSIDERATION | for REHEARING EN BANC

According to Rule 219 and Rule 221 of the Appellate Rules of procedure the Appellant moves this Court to Reconsider and for Rehearing en banc the Appellant motion to Relieve Counsel, for ineffectiveness of Appellate Counsel, and for the three Exception to the mootness doctrine, and for this Court lacks subject matter Jurisdiction, in part, to hear this appeal because this Court has overlooked significant facts of exceptional importance where the uniformity of the full Court is needed in this case.

The Appellant base this motion on the following facts.

## FACTS

The Appellant gave Reference to and incorporate the facts in this section for relief his one hundred page brief in this Court that goes into details in issues 1-25 Administrative / Appellate Counsel Ineffectiveness on this appeal and the motion to Relieve and substitute Counsel, and motion in opposition to Respondent dismissal of the appeal as moot, and his writ of Mandamus on this Court, and among others.

## ARGUMENT IN SUPPORT OF THIS MOTION

subject matter jurisdiction can be raised at any time. see Knight pub. Co. v University of South Carolina 367 S.E.2d 20 (1988); State v Richburg 403 S.E.2d 315 (1991) This Courts lacks subject matter jurisdiction over the safekeeper issue because Judge Diana S Goodstein was given Exclusive Jurisdiction over the Appellant Capital case by the state supreme court, and two, SC code § 44-22-20, habeas corpus of South Carolina has jurisdiction over the Appellant placement in the South Carolina Department of Correction (SCDC) as a severe mental health inmate.

next, the Appellant falls under the three Exception of the mootness doctrine for the following Reasons, but not limited to it, that this Court had over looked:

The Appellant will get his October 13, 17 murder conviction overturned on appeal. This will in turn place him of being placed as a severe mental inmate back into the South Carolina Department of Correction when South Carolina knows for a fact that the Appellant is ineligible to be placed there. See e.g. Nelson v Ozmint, 702 S.E.2d 369, 370 (2010) (addressing moot issue of the Department's calculation of the prisoner's sentence as not including good time credits or earned work credits because it was an issue that was capable of repetition, yet it would usually evade review); Hayes v State 777 S.E.2d 6 (2015) (Because petitioner is no longer incarcerated, this issue is moot. However, an appellate court can take jurisdiction... if the issue is capable of repetition... the issue here is capable of repetition but evading review; therefore, we address the merits.) furthermore, there's no judicial guidance for the executive and judicial branches officials of South Carolina on the safekeeper issue. This too falls under the second exception of the mootness doctrine. See Sloan v Department of Transp. 666 S.E.2d 236 (2008)

plus, the Appellant faces the same condition of confinement as safekeeper status as special management unit (SMU) loss up when the Appellant goes back there. The lack of legal paper, legal materials on Georgia law, legal computer access - the same access to the court policy as stated in issues 19-21 in his one hundred page brief - the Appellant will face in repetition. This includes two in

since the denial of publication such as law books or books from the outside publisher company, the non credit of the appellant inmate account on since for extra postage, and the denial of medical treatment as stated in issue 22-23 of his brief.

furthermore, Counsel ineffectiveness in issues 10-13 of his one hundred page brief has caused the appellant collateral consequences for Counsel's not raising the lack of subject matter jurisdiction as stated above in either this court, the Administrative Law Court, or in front of Judge Goodstein regarding the safekeeper issue as stated in issues 1-25 in his brief.

furthermore, the appellant is in a violent clom within the SCU because of the Executive Branch version of the appellant being a violent inmate in the County Detention Center of Edgefield, Aiken, Laurens, and Greenwood that had placed the appellant on safekeeper status.

furthermore, Counsel conspiracy with SCU lawyer on the safekeeper issue in both the Administrative Law Court and this court has been state action to the extreme. This includes too with the South Carolina Court of Appeals in Blatantly changing the appellant issues on this appeal for the state; for example, the denial of the appellant motion to relieve and substitute Counsel in an arbitrary way without any due process of law.

CONCLUSION

WHEREFORE, the Appellant prays that this Court grant this motion and such other and further relief this Court seem just and proper.

Date: 1/3/18

STEVEN LAZZI BARNES  
STEVEN LAZZI BARNES  
# 327117  
McCormick Institution  
386 Redemption Way  
McCormick, SL 29899

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Administrative Law Court

Case No. 15-ALJ-30-0318-AP

RECEIVED

JAN 08 2018

SC Court of Appeals

South Carolina Department of  
Corrections, and et. al

Respondent

Steven Louis Barnes

Appellant

PROOF OF SERVICE

I, Steven Louis Barnes, do hereby certify that on 1/3/18, I  
deposited the following documents MOTION for RECONSIDERATION/  
for REHEARING EN BANC that I am filing in the South Carolina  
Court of Appeals in the United States mail with sufficient postage  
to the below party:

SERVED

Lance Summers

Attorney At Law

339 Hayward Street - Suite 200

Columbia SC 29201

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Administrative Law Judge

Case No. 15-ALJ-30-0318-AP

Steven Louis Barnes

Appellant

vs

SC Dept of Correction  
and et. al

Respondent

MOTION TO RECALL THE REMITTITUR SO THE APPELLANT TIMELY  
MOTION FOR RECONSIDERATION, FOR EN BANC HEARING TO BE CONSIDERED  
BY THIS COURT

The Appellant crave reference to and incorporate the facts and arguments in his  
second writ of Mandamus against the South Carolina Court of Appeals in which  
is attached to this motion, in this section for relief.

on September 25, 17, the Appellant had filed an one hundred page brief, raising in issues 10-13 of the brief ineffectiveness of Counsel in the contested hearing of the Administrative Law Court and the Court of Appeals, in both this court and the South Carolina Supreme Court. on November 22, 17 the Appellant had filed his first writ of Mandamus against the following: office of Indigent Defense, Shane Beanson; South Carolina Commission on Indigent Defense; South Carolina Court of Appeals; South Carolina Department of Correction. The South Carolina Supreme Court clerk had refused to file the first writ on the grounds of hybrid representation. see Exhibit (1) The Appellant had filed a motion for reconsideration of the first writ in the state supreme court. Also, the Appellant had filed a motion to relieve and to substitute Counsel in both this court and the state supreme court. The Court of Appeals clerk first responded to the petitioner motion to relieve Counsel by threatening to not file the motion to relieve if the Appellant did not file a proper proof of service and twenty-five (25) dollars filing fee. see Exhibit (2) on December 15, 17 the state Supreme Court had issued an order for the Court of Appeals not to hear any motions by the Appellant except a motion to relieve Counsel. see Exhibit

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(3) on December 21, 2017 the Court of Appeals had denied the Appellant motion to relieve Counsel, and granting the South Carolina Department of Correction (SCDC) lawyer motion to dismiss the Appellant appeal as moot. see Exhibit (4) on 1/21/18 the Appellant had filed a motion for rehearing and for en banc hearing in the Court of Appeals regarding the Appellant motion to relieve Counsel and the grounds of ineffectiveness of Counsel as stated above that supports the motion. on January 8, 2018 the Court of Appeals clerk had filed a Remittitur to the lower court without hearing the

Appellant Motion for Reconsideration of Motion to Relieve. See Exhibit (5)  
On January 26, 2015, the Appellant had filed his second writ of Mandamus  
against the Court of Appeals. See Exhibit (6) In the abundance of caution  
the Appellant on January 2015 had filed a notice of Appeal to the  
State Supreme Court regarding the above facts. See exhibit (6)

### ARGUMENT IN SUPPORT TO RECALL THE REMITTITUR

The state supreme court in *State v Barnes* 774 S.E.2d 454 (2015)  
had addressed the issue of recalling the Remittitur from the lower  
court. "In order to justify this court in exercising the unusual  
power of recalling the Remittitur after it has been sent down, a  
very strong showing would be required that the Remittitur was  
sent down through some mistake or inadvertence on the part of  
this court or its officer. See *State v Barnes* supra (quoting *State*  
*v Neels* 17 S.E. 802 (1893))

The Court of Appeals clerks are utilizing the Rules of Court capriciously  
and arbitrarily against the Appellant, see *Hamilton v Board of Trustees*  
319 S.E.2d 212, 721 (Ct. App 1984) to defeat his cause of actions,  
see *Logan v Zimmerman Brush Co.*; 455 US 422 (1982) in a  
retaliatory and punishing ways, see *Crawford et al v Britton* 523  
US 524, 555 n 10 (1998) because the Appellant is exercising his  
access to the courts. See *Bonds v Smith* 430 US 817 (1977)  
Therefore, the Appellant has met the standard for this court to

Recall the remittitur from the lower court so this court can hear the motion for En banc hearing. Failure to hear the motion will violate the Appellant due process rights. See *Wolff v McDonnell*, 418 US 539 (1974)

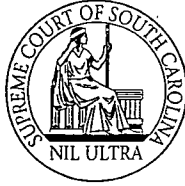
CONCLUSION

WHEREFORE, the Appellant prays that this court grant this motion, and reset the thirty (30) days clock to appeal to the state supreme court after this court hear the motion for En banc hearing, and he prays for such other and further relief this court seem just and proper.

Date: 1/26/18

*Steven Laiz Barnes*  
STEVEN LAIZ BARNES #327117  
McCormick Correctional Institution  
386 Redemption way  
McCormick, SC 29599

Exhibit (1)



# The Supreme Court of South Carolina

DANIEL E. SHEAROUSE  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE: (803) 734-1080  
FAX: (803) 734-1499

November 22, 2017

**RECEIVED**  
NOV 22 2017  
SC Court of Appeals

Mr. Steven Lois Barnes, #3217117  
Kirkland Correctional Institution  
4344 Broad River Road  
Columbia, SC 29210

Re: Steven Barnes v. SCDC  
Appellate Case No. 2017-000967

Dear Mr. Barnes:

This responds to your petition for a writ of mandamus dated November 21, 2017. This petition is related to the above case that is pending before the South Carolina Court of Appeals.

Since you are represented by counsel in the above case, I cannot accept this *pro se* petition for filing and no action will be taken on it by this Court. *Miller v. State*, 388 S.C. 347, 697 S.E.2d 527 (2010); *Jones v. State*, 348 S.C. 13, 558 S.E.2d 517 (2002); *State v. Stuckey*, 333 S.C. 56, 508 S.E.2d 564 (1998); *Foster v. State*, 298 S.C. 306, 379 S.E.2d 907 (1989).<sup>1</sup>

Very truly yours,

CLERK

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<sup>1</sup> If, of course, you desire to have your current counsel relieved, then that is a matter that you will need to raise by appropriate motion to the Court of Appeals.

Exhibit (2)



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

December 07, 2017

Steven L. Barnes, 327117  
Kirkland Correctional Institution  
4344 Broad River Road  
Columbia SC 29210

Re: Steven Barnes v. SCDC  
Appellate Case No. 2017-000967

Dear Mr. Barnes:

Upon reviewing your motion to relieve counsel, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and each deficiency must be corrected in its entirety within ten (10) days of the date of this letter or your motion will not be considered:

- The accompanying proof of service is not in compliance with the SCACR. Specifically, you must provide a copy of the motion, not a notice, to opposing counsel. You must also provide a copy of the motion to your counsel of record. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- The required filing fee has not been submitted. The correct filing fee is \$25.00.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Lake Eric Summers, Esquire  
Stephen Hollis Lunsford, Esquire  
Shane Edwin Goranson, Esquire  
William Sean McGuire, Esquire

Exhibit (3)

# The Supreme Court of South Carolina

Steven L. Barnes, Appellant,

v.

South Carolina Department of Corrections, Respondent.

Appellate Case No. 2017-002505

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## ORDER

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The appeal in this matter is pending before the South Carolina Court of Appeals under Appellate Court Case Number 2017-002505. Petitioner is represented by counsel in this appeal.

By letter dated November 22, 2017, the Clerk of this Court rejected a petition for a writ of mandamus petitioner had filed *pro se* relating to the above appeal. This rejection was based on the cases of *Miller v. State*, 388 S.C. 347, 697 S.E.2d 527 (2010); *Jones v. State*, 348 S.C. 13, 558 S.E.2d 517 (2002); *State v. Stuckey*, 333 S.C. 56, 508 S.E.2d 564 (1998); *Foster v. State*, 298 S.C. 306, 379 S.E.2d 907 (1989).

Petitioner has now filed a motion asking for reconsideration of the rejection of this petition for a writ of mandamus. The request for reconsideration is denied, and the petition for a writ of mandamus is hereby stricken and dismissed under the cases listed above.

Petitioner is reminded that the only motion that he can file related to this matter is a motion to relieve counsel. As long as he is represented by counsel in this matter, any other motion or other document seeking relief above and beyond the relief of counsel will not be accepted by either this Court or the Court of Appeals.

Finally, to the extent that petitioner may be asking this Court to relieve counsel or appoint new counsel, that request is dismissed without prejudice since this relief should be sought in the Court of Appeals rather than in this Court.<sup>1</sup>

  
\_\_\_\_\_  
FOR THE COURT C.J.

Columbia, South Carolina  
December 15, 2017

cc: Shane Edwin Goranson, Esquire  
William Sean McGuire, Esquire  
Lake Eric Summers, Esquire  
Stephen Hollis Lunsford, Esquire  
✓Mr. Steven L. Barnes

---

<sup>1</sup> According to the Appellate Case Management System, petition has filed a motion to relieve and substitute counsel with the Court of Appeals. This motion was received by the Court of Appeals on December 6, 2017.

Exhibit (4)

# The South Carolina Court of Appeals

Steven L. Barnes, Appellant,

v.

South Carolina Department of Corrections, Respondent.

Appellate Case No. 2017-000967

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## ORDER

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After careful consideration, Appellant's motion to relieve counsel is denied. Furthermore, because Appellant was convicted and sentenced to life imprisonment on October 13, 2017 and entered into the South Carolina Department of Corrections' custody on October 16, 2017, this appeal is moot and Respondent's motion to dismiss is granted. *See Shah v. Richland Memorial Hospital*, 350 S.C. 139, 150, 564 S.E.2d 681, 687 (Ct. App. 2002) ("A case becomes moot when judgment, if rendered, will have no practical legal effect upon [an] existing controversy. This is true when some event occurs making it impossible for [a] reviewing [c]ourt to grant effectual relief."). The remittitur will be sent as required by Rule 221(b), SCACR.

  
FOR THE COURT

Columbia, South Carolina

cc:

Steven L. Barnes, 327117  
Lake Eric Summers, Esquire  
Stephen Hollis Lunsford, Esquire  
Shane Edwin Goranson, Esquire  
William Sean McGuire, Esquire

**FILED**

Dec. 21, 2017

Exhibit (5)



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
www.sccourts.org

January 08, 2018

The Honorable Jana E. Shealy  
1205 Pendleton Street  
Columbia SC 29201

## REMITTITUR

Re: Steven Barnes v. SCDC  
Lower Court Case No. 2015ALJ300318AP  
Appellate Case No. 2017-000967

Dear Clerk of Court:

The above referenced matter is hereby remitted to the lower court or tribunal. A copy of the judgment of this Court is enclosed.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jenny Kitchings".

CLERK

Enclosure

cc: Steven L. Barnes, 327117  
Lake Eric Summers, Esquire  
Stephen Hollis Lunsford, Esquire  
Shane Edwin Goranson, Esquire  
William Sean McGuire, Esquire

Exhibit (b)

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Administrative Law Judge

Lower Court Case # 2015 ALJ 300318 A7; Appellate  
Case # 2017-000967

Steven Louis Barnes

Appellant

vs

SC Dept of Correction  
and Et. Al

Respondent

NOTICE of APPEAL TO THE SOUTH CAROLINA SUPREME COURT

The Appellant appeals to this Court, pursuant to Rule 203(b)(6) of the South Carolina Appellate Court Rules of procedure and SC Code § 1-23-390, the decision of the South Carolina Court of Appeals to deny the Appellant Motion to Relieve Counsel and his grounds in the one hundred page brief, in issues 10-13, of ineffectiveness of both Counsels at the contested hearing in the Administrative Law Court and Counsels in the Court of Appeals, the

latter issues would had entitled the Appellant according to Strickland vs Washington 104 Sct 2052 (1984) to an evidentiary hearing concerning the three exception to the mootness doctrine, and among other grounds, of Ineffectiveness of Counsel in the brief; therefore, the Appellant was denied both procedural and substantive due process by the Court of Appeals not remanding his Ineffectiveness of Counsel issues to the lower Court for an Evidentiary hearing.

Date:

Steven Louis Barnes  
STEVEN LOUIS BARNES #327117  
McCombs Correctional Institution  
386 Redemption Way  
McCombs, SL 29899

To: The Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, S.C. 29211

RECEIVED

FEB 01 2018

SC Court of Appeals

From: Steven Louis Barnes #327117  
McCormick Correctional Institution  
386 Redemption way  
McCORMICK, SC 29899

RECEIVED

FEB 01 2018

S.C. SUPREME COURT

RE: Barnes v SCDC, Appellate Case #2017-000967

Dear Clerks:

Please file my Motion for Reconsideration / for  
Rehearing En banc Regarding my motion to Revoke  
Counsel; and my Second writ of Mandamus against  
the South Carolina Court of Appeals, and notice  
to appeal in this Court.

Thank you kindly  
Date: 1/26/18

Respectfully SUBMITTED  
STEVEN LOUIS BARNES  
#327117

Steven Louis Barnes #327117  
McCormick Correctional Institution  
386 Redemption way  
McCormick, SC 29899

COA

~~THE SUPREME COURT of South Carolina  
P.O. Box 11330  
Columbia, S.C. 29211~~