

STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Administrative Law Judge H.W. Funderburk, Jr.

RECEIVED

AUG 23 2018

SC Court of Appeals

ALL Case. 17-ALJ-04-0507-AP

Jakarta Young #276572

RESPONDENT.

v.

South Carolina Department of Corrections

APPELLANT.

MOTION FOR APPOINTMENT OF COUNSEL

I Jakarta Young filed a Motion for Appointment of Counsel because I don't know and fully understand the Rules of the Court of Appeals. I have never seen any Rules or Procedures of the Court of Appeals. Furthermore, I've asked and requested to staff 41 times to go to the law library stating I have this pending appeal to the staff at the institution I'm currently at and I have not been allowed to go yet. I do know that if I don't file my documents according to the Rules of the Court of Appeals my appeal could be dismissed if not corrected in 10 days time limit. However, the officer over the law library takes half that time to respond to your request to staff which only states "will add to outcount" which from that point it takes another

Few days if you lucky to go out that point. Also, SCDC will not allow inmates to make copies even at the inmates own expense if the document is handwritten like such. So if I submit any documents to the Court I have to handwrite each page 4 times (2 to the Courts ALC & Court of Appeals, 1 for SCDC, 1 for myself) making it impossible to submit documents in a timely manner. I'm not familiar with any Motions that's been filed by the Appellant (SCDC) and do not know how to properly respond back to the Motions.

Therefore, for the above reasons I'm not able to represent myself in my Appeal in this Honorable Court and respectfully request Appointment of Counsel pursuant, SCACR. Also, I'm not getting daily access to the mailroom or my mail (legal).

Other Counsel of Record

General Counsel

Kelsey Barrett

P.O. Box 21787

Columbia, South Carolina 29221

Respectfully Submitted,

J. Young Sr.

Jakarta Young #276572

Evans Correctional Institution

610 Highway 9 West

Bennettsville, South Carolina 29517

August 20, 2018

Bennettsville, S.C.

STATE OF SOUTH CAROLINA

In The Court of Appeals

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Administrative Law Judge H.W. Funderburk, Jr.

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ALC Case # 17-ALJ-04-0507-AP

SC Court of Appeals

Appellate Case# 2018-001293

Jakarta Young 276572

RESPONDENT.

v.

South Carolina Department of Corrections

APPELLANT.

CERTIFICATE OF SERVICE

Undersigned hereby certifies that on today's date, he mailed a copy of the Motion for Appointment of Counsel via U.S. Mail addressed individual(s) as follows: General Counsel S.C. Dept of Corr. P.O. Box 21787 Columbia, S.C. 29221; Honorable H.W. Funderburk, Jr. South Carolina Administrative Law Court, 1205 Pendleton Street, Columbia South Carolina 29201; Honorable Jenny A. Kitchings Clerk of Court S.C. Court of Appeals P.O. Box 11629 Columbia, South Carolina 29211

J. Young Sr.
Jakarta Young #276572
Evans Correctional Institution
610 Highway 9 West
Bennettsville, S.C. 29512

August 20, 2018

August 20, 2018

The Honorable Jenny A Kitchings
Clerk of Court, S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Jakarta Young #276572 v. South Carolina Dept. of Corr.
Appellate Case No. 2018-001293

Dear Ms. Kitchings,

Find enclosed a copy of the Motion for Appointment of Counsel along with Proof of Service, in the above referenced appeal. Also, I'm not getting daily access to the mail room.

Thank you for your attention to this matter and please do not hesitate to contact me should you have any questions or concerns.

Sincerely,

J. Young Sr.
Jakarta Young #276572

PRO SE

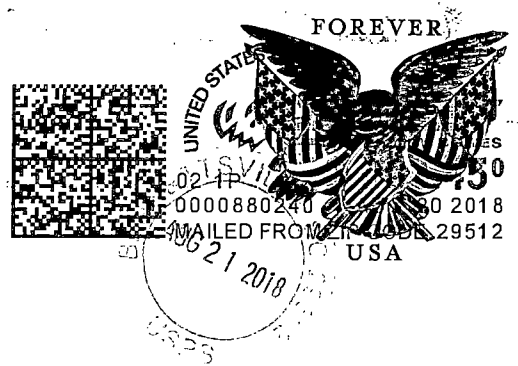
Respondent

cc: General Counsel

P.O. Box 21787

Columbia, South Carolina 29221

Jakarta Young 276572
Evans Correctional Institution
10 Highway 9 West
Bennettsville, S.C. 29512



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Attn: Honorable Jenny A. Kitchings
S.C. Court of Appeals
P.O. Box 11629
Columbia, S.C. 29211

LEGAL

29211-162929

