

LEGAL  
MAIL  
ONLY

In The Court of Appeals For  
Berkeley County, South Carolina

RECEIVED

DEC 10 2018

SC Court of Appeals

State of South Carolina  
Respondant

Case No. 2018-000189

V.

Christopher Greene III  
Appellant

Motion For Appointment of  
Counsel and Extension of  
Time

Come now Appellant Christopher Greene III, hereafter "Appellant" in the above entitled cause hereupon respectfully move this Honorable Court for the appointment of counsel and for extension of time for the following reasons:

On February 2, 2018 notice of appeal was given, and that, attorney Joanna K. Delany was appointed in assisting Appellant on his appeal. On October 30, 2018, "Counsel" Joanna K. Delany herein after "Counsel" filed an Andes Brief and Motion to be relieved as Counsel for appellant on appeal.

With the above in mind, it is the position of Appellant, that Counsel without investigating the case, nor interview the appellant, filled on Andes Brief, thereby rendering to be ineffective assistance, Appellant contend that a question of law is to be present for review and there is evidence for review to show inconsistent testimonies.

**LEGAL  
MAIL  
ONLY**

Without effective assistance of Counsel for direct appeal would deny Appellant a substantial due process right to be heard on direct appeal.

Appellant further states, that, his right to be heard, is furthermore being hindered, where the institution the Appellant is confined, Kirkland RIE Center, is on lockdown and has restricted operational movement to where appellant is being denied access to the Law Library. Moreover, the only law books available are law book back dated 2015 and earlier, no 2016, 2017 and to date law books. Thereby denying Appellant access to the court, attached hereto is a sworn Affidavit contesting to the fact, that Appellant has limited access to the law library and that Appellant is being denied access to Court to be heard.

It is noted, that the ineffective "Counsel" on this appeal has did nothing more than delay the appeal process and no adequate results for this appeal proceedings has been rendered.

Therefore, Appellant contend that new Counsel is warranted and Extension of Time is needed in order for Appellant to have an effective full fact finding appeal process.

Wherefore, it is the position of Appellant, that for the above stated reasons respectfully move the Honorable Court for Appointment of Counsel and Extension of Time.

LEGAL

MAIL  
ONLY

Respectfully, Submitted

C. Greene  
Christopher Greene III # 264680

Kirkland RFE Center F-1 128B  
4344 Broad River Road  
Columbia, S.C. 29210

Subscribed and Sworn to before  
me this 5<sup>th</sup> day of December, 2018.

Beth A. Mangold

Notary Public of South Carolina

My Commission Expires:

BETH A. MANGOLD  
Notary Public, State of South Carolina  
My Commission Expires 8/10/2028



cc: Alan McGary Wilson, Esquire  
John Benjamin Aplin, Esquire  
Joanna Katherine Delany, Esquire  
File copy

**LEGAL  
MAIL  
ONLY**

The State of South Carolina  
In The Court of Appeals

Appeal From Berkeley County  
Honorable D. Craig Brown, Circuit Court Judge

The State  
Respondant  
v.

Christopher Greene III  
Appellant

**RECEIVED**

DEC 10 2018  
SC Court of Appeals

PROOF OF SERVICE

I hereby certify that the foregoing Motion for Appointment of Counsel, Extension of Time, and Sworn Affidavit was duly served by U.S. Mail upon Alan McCrory, Esq., John Benjamin Aplin, Esq. and Joanna Katherine Delany, Esq., on December 5<sup>th</sup> 2018.

Respectfully Submitted

Subscribe and Sworn to before  
me this 5<sup>th</sup> day of December, 2018

C. Greene III  
Christopher Greene III 264680  
Kirkland R/E Center #11288  
4344 Broad River Road  
Columbia, S.C. 29210

Beth A. Mangold  
Notary Public of South Carolina  
My Commission Expires BETH A. MANGOLD  
Notary Public, State of South Carolina  
My Commission Expires 8/10/2028

**LEGAL**

**MAIL**

**ONLY**

South Carolina Court of Appeals

Post Office Box 11629

Columbia, SC. 29211

December 05, 2018

**RECEIVED**

DEC 10 2018

SC Court of Appeals

To whom it may concern:

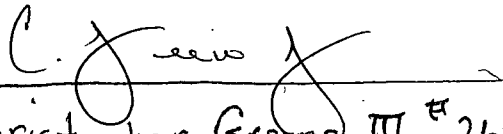
Please forward a copy to the following:

- (A) Alan McCrory Wilson - Esquire
- (B) John Benjamin Aplin - Esquire
- (C) Joanna Katherine Delany - Esquire

Also, I request a clock, date, and stamped copy to be sent back to Christopher Greene III # 264680 at Kirkland R<sup>1</sup>/<sub>E</sub> Center, 4344 Broad River Road Columbia, S.C. 29210, provided, a self-addressed stamped envelope.

In advance, allow me, Thank You!

Respectfully, Submitted



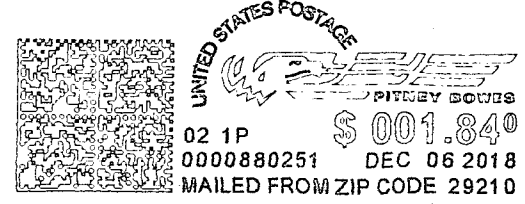
Christopher Greene III # 264680

Kirkland R<sup>1</sup>/<sub>E</sub> Center F-1 128B

4344 Broad River Road

Columbia, S.C. 29210

Kirkland R/E Center F-1 128B  
4344 Broad River Road  
Columbia, S.C. 29210



**RECEIVED**  
DEC 10 2018  
SC Court of Appeals

The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
DEC 06 2018  
LEGAL MAIL ONLY  
KIRKLAND R/E CENTER  
MAILROOM

