

The State of South Carolina
In the Court of Appeals

Reyes Cabrera-Peña
Respondent
V
SCDC
Appellant

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FEB 14 2019
SC Court of Appeals

Case: N. 2018-001324

Motion For Appointment Of Counsel

Comes now Respondent, in the above captioned cause and on behalf of himself, and hereby request this honorable Court to Appoint Counsel to represent him in this appeal where he is the pro se respondent, and for the following reasons to wit:

1. Respondent is not financially to afford Counsel.
2. The issues involved this case are complex.
3. The prison law library is inadequate, in the respondent also has a limited knowledge of the Law.
4. The end of Justice would best be served in this cause if an attorney was appointed to represent the respondent.

Date: February 11, 2019

S/ Reyes Cabrera-Peña
Respondent.

In The State of South Carolina
In The Court of Appeals.

Appeal From The South Carolina Administrative Law Court
H.W. Funderburk Jr, Administrative Law Judge
Administrative Law Court Docket N. 16-ALJ-04-0397-AP
Appellant Case N. 2018-001324

Reyes Cabrera-Peña # 265665 _ _ _ _ _ Respondent
V
South Carolina Department of Corrections _ _ Appellant.

Proof of Service

I certify that I have served the respondents Motion For Appointment of Counsel, on the above-named appellant by depositing a copy of it in the United States Mail, postage prepaid, on February 11, 2019. Addresed to its Attorney of record, Lake E. Summers Malone, Thompson, Summers & Ott LLC, 339 Heyward Street, suite 200 Columbia SC 29201

Date: February 11, 2019

S/ Reyes Cabrera-Peña
Reyes Cabrera - Peña
PCI Q1A-219 #265665
430 Oaklawn Road
Pelzer SC 29669

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In The State of South Carolina
In The Court Of Appeals

Reyes Cabrera-Peña

Respondent

V

SCDC

Appellant

Case: N. 2018-001324

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SC Court of Appeals

Application To proceed without Pre Payment Of
Cost And Affidavit in Support There Of

Comes now Reyes Cabrera-Peña, and hereby applies for leave to proceed in the above case without prepayment of fees or costs, and in support of my application I declare that the following facts are true:

1. I am the respondent in the above case and I believe I am entitled to file a Final Brief.
2. Because of my poverty, I am unable to pay the costs of said proceeding or give security therefor.
3. The nature of this appeal was filled by SCDC as respondent, my argument is that ALC made correct ruling on this case previously.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 11 day of February 2019

S/ Reyes Cabrera Peña
Respondent.

In The State OF South Carolina
In The Court OF Appeals

Appeal From The South Carolina Administrative Law Court
H.W Funderburk Jr Administrative Law Judge
Administrative Law Court Docket No. 16-ALIS-04-0397-AP
Appellant Case No. 2018-001324

Reyes Cabrera-peña # 265665 - - - - - Respondent.

✓
South Carolina Department of Corrections - - - - - Appellant.

Proof of service

I certify that I have served the Respondents Application to proceed in Forma Pauperis on the above-named, Appellant by depositing a copy of it in the United States Mail, postage pre paid, on February 11, 2019. Addressed to its Attorney of record, Luke E. Summers, Malone, Thompson, Summers & Ott LLC, 339 Heyward street, suite 200, Columbia, S.C. 29201

Date: February 11, 2019

S/ Reyes Cabrera-peña

Reyes Cabrera - Peña

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SC Court of Appeals

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P.C.I. MAILROOM

South Carolina Court of Appeals
Jenny Abbott Kitchings clerk
Post office Box 11629
Columbia, SC 29211

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