

STATE OF SOUTH CAROLINA
COURT OF APPEALS

*
* IN THE COURT OF APPEALS
* OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA
GREENVILLE COUNTY

*
* NOTICE OF MOTION
* FOR
* APPOINTMENT OF COUNSEL

vs.

2006 FORD F-350
VIN # 1FTWW31P86ED61140
DEFENDENT PROPERTY AND

TONJA MECHELLE FLYTHE-HARKLESS
AND DAVID GREEN JR.

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SC Court of Appeals

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Pursuant to 28 U.S.C § 1915 (E)(1) Plaintiff moves for an Order Appointing Counsel to represent him in this case in support of this motion Plaintiff state:

(1) Plaintiff has been imprisoned for over 20 months and the imprisonment has/is greatly limit His ability to litigate (Plaintiff is awaiting trial in Greenville County Circuit Court, South Carolina on criminal charges) Also Plaintiff has limited access to law library and very limited knowledge of the law

(2) Plaintiff is unable to afford counsel He has requested leave to proceed in forma pauperis (which was already granted on 10-25-2018)

(3) Credibility will be an issue and a trial will likely involve conflicting testimony and counsel would better enable Plaintiff to present evidence and cross examine witness

Wherefore, Plaintiff requests that the Honorable Court appoint Counsel in this civil matter Pursuant to 28 U.S.C § 1915(E)(1)

Date : March 15, 2019

Submitted By,
David Green Jr.
David Green Jr.

CERTIFICATE OF SERVICE

I, David Green Jr., hereby states that a copy of the Attached Petition^{ion}s, was served upon 13th Circuit Solicitor's Office, of Greenville County, by depositing a copy of the same in the United States Mail with the proper First class postage prepaid, and was addressed to his Office at 305 East North Street, Suite 325, Greenville, S.C., 29601, on this month of March 18, 2019.

Respectfully Submitted,
David Green Jr.
David Green Jr.

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MAR 21 2019

SC Court of Appeals