

State of South Carolina
In the Court of Appeals

Appeal from the Administrative Law Court
Administrative Law Judge S. Phillip Lewski

ALC Case No. 17-ALJ-04-0163-AP
Appellate Case No. 2018-002243

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MAY 06 2019
SC Court of Appeals

John K. Massey, Jr. # 305341 Appellant,

South Carolina Department of Corrections, Respondent,

Motion for Appointment of Counsel

The undersigned Pro-Se Appellant, John K. Massey, Jr., petitions and moves for this Court to appoint him counsel for his appeal: Case No. 2018-002243.

Appellant began this case as an Indigent Pro-Se litigant in the Administrative Law Court (ALC). Even though the ALC granted Appellant some relief, Appellant petitions the Court of Appeals because one (1) of his issues presented in the ALC was not ruled upon - which is a constitutional created liberty interest.

In the Court of Appeals, Appellant is representing himself Pro-Se. However, because of the many obstacles self-representation may present, Appellant asks this Court grant him Indigent Appellate Counsel. Appellant has never represented himself in the Appellate Court, and is not familiar with many of the Appellate Court Rules of Law. (e.g. SCAR 210, 211).

Wherefore, due to the constitutional created liberty interest and error of law already addressed by the ALC, Appellant requests this Court grant him indigent appellate counsel and hold this matter in abeyance pending a ruling this Motion.

April 29th, 2019

Respectfully Submitted
John K. Massey, Jr.

John K. Massey, Jr. #305341
MacDougall Correctional Inst.
1516 Old Gillard Rd.
Ridgeville, South Carolina 29472

State of South Carolina

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John K. Massey, Jr. # 305341,

Appellant,

v.

South Carolina Department of Corrections,

Respondent

Certificate of Service

Undersigned Counsel hereby certifies that today's date he mailed a copy of Appellant's Reply Brief and a Motion for Appointment of Counsel to the following parties last known address v.a U.S. Mail.

① Kensey E. Barrat
Office of General Counsel
S.C. Department of Corrections
P.O. Box 21787
Columbia, S.C. 29221

② Jenny A. Kitchings
S.C. Court of Appeals, Clerk
P.O. Box 11629
Columbia, S.C. 29211

S/ John K. Massey, Jr. # 305341
MacDougall Correctional Inst
1516 Old Gillard Rd
Ridgeville, S.C. 29472

April 29th, 2019

April 29th, 2019

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

John K. Massey, Jr. #305341
MacDougal Correctional Inst.
1516 Old Gilliard Rd.
Ridgeville, South Carolina
29472

RE: John K. Massey, Jr. #305341 v. South Carolina Department of
Corrections, Appellate Case No. 2018-002243

Dear Ms. Kitchings:

Enclosed is the original copy of Appellant's Reply Brief, Motion
for Appointment of Counsel, and Proof of Service of each in the above
captioned appeal.

Thank you for your help in this matter.

Sincerely
John K. Massey, Jr.

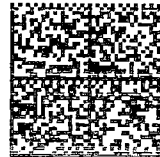
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The Honorable Jenny A. Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, South Carolina

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