

The South Carolina Court of Appeals

James Anthony Primus 252315

v.

South Carolina Department of Corrections

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SC Court of Appeals

Appellate Case No 2019-001277

Initial Brief

Pursuant to SCRPC 1915(c) Appellate moves for an order Appoint Counsel to Represent him in this case in support of this Motion for Declaratory Judgment Appellate States:

- 1 Appellate who is currently incarcerated at the MacDougal Correctional Institution in Ridgeville S.C.
- 2 Appellate is unable to Afford Counsel he has been Granted leave to Proceed in forma Pauperis
- 3 Appellate Imprisonment will greatly limit his ability to litigate the Issues involved in this case are Complex and will require significant Research and Investigation Appellate has limited access to and Computer not allowed to make Copies of Legal material that (Has web law Computers)

Not come from and Clerk of Court Barling the
Clerks Clock Stamp not able to Copy transcripts
that are imperitive to my case nor Copies For
Respondents due to SCDC Policies each motion
to be hand written by Appellate and due to
Policies of SCDC ms. Joyce Campbell mailroom
Clerk will not make Copies for Inmates

4 This is Further complicated by

A The effects of Appellate Incarceration

B Inaccessibility to Prison Records of Appellate

C Non-Disclosure by Classification Inmate Records

Personal of NCIC Records

5 The omission of the above mentioned complications
allow Appellate to give a meticulous detailed
explanation in order to prevent mis construal

This is the only way Appellate can try to explain

6 Appellate Has made Repeated efforts to obtain
a lawyer

Wherefore Appellate Request that the court Appoint
a member of the Bar as counsel in this case

October 21 2019

Respectfully Submitted
Dwayne Anthony Paine Pro-Se
1506 Old Billiard Road
Ridgewayne S.C 29402

The South Carolina Court of Appeals

James Anthony Primus 252315
MacDougal Correctional Inst.
1516 Old Gilliard Road
Ridgeville S.C. 29472
October 21 2019

S.C. Court of Appeals
Jenay ABBOTT Kitchings clerk
Post Office Box 11629
Columbia S.C. 29211

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SC Court of Appeals

RE: James Anthony Primus 252315 U.S.C.
Department of Corrections
Case No 2019 - 001297

Dear Honorable Clerk

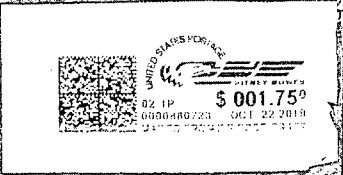
Enclosed for service on you please find Appellate
initial Brief and motion for appointment of Counsel
and Certificate of Service

With kindest regards

Sincerely

James Anthony Primus
pro se

FROM
James Anthony Pinnas, 252315
MacDougal Correctional Institution
1516 Old Gullward Road
Ridgeville, SC 29472



MacDougal Correctional Inst
Mailroom
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Mr. Terry A. Burt, Kitchener, Clerk
TO: South Carolina Court of Appeals
Post Office Box 111629
Columbia, SC 29211

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SC Court of Appeals

