

THE SOUTH CAROLINA COURT OF APPEALS

IN THE South Carolina Court of Appeals

James Anthony Primus 252315 Appellant

v.

SOUTH CAROLINA DEPARTMENT OF

CORRECTIONS

Respondent

Appellate Case No. 2019-001277

Initial Brief

Appointment of Counsel

Pursuant to S.C.R.C.P. 1915 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 - Ridgeville S.C. 29476
- 2 Appellate respectfully request of this court to grant and appointment of counsel
- 3 while pro se complaints are held less stringent standards than those drafted by attorneys the fact remains that the majority of prisoners are laymen

Not versed in the Science of Law Appellant Vice lies in his inability to express himself clearly in describing Respondents Actions.

4 This is Further complicated by:

A. The Affects of Appellate Incarceration

B Inaccessibility to Inmate Records

C Non-Disclosure by SCDC Staff of Inmates Central in its entirety

5 The Omission of the above mention (Complication) Allows Appellate to give a meticulous detailed explanation in order to prevent misconstruct This is the only way he can try to explain

6 Appellate is unable to Afford Counsel He has been granted leave to Proceed in forma Pauperis

7 Appellate Imprisonment will greatly limit his ability to litigate The Issues involved in this case are complex and will require significant Research and Investigation

8 Appellate Has limited Access to Prison Law Library By SCDC Policy Inmates are not afforded the rights to make copies to serve upon Respondents

9; or have original Trial Transcripts Copied  
every thing must be done by Hand motions Briefs  
Whatever legal Requirement that the Court need have  
to be written by Hand

### Conclusion

WHEREFORE Appellant Request that the Court  
Appoint a member of the SOUTH CAROLINA  
Bar as Counsel in this Case

RE spect Fully Submitted

James Anthony Primus 252315

November 1 2019

James Anthony Primus Pro Se  
MacDougal Correctional Institution  
Birch Unit 2 C 13 B  
1516 Old Gilliard Road  
Ridgeville S.C. 29472

The SOUTH CAROLINA COURT OF APPEALS

IN THE SOUTH CAROLINA COURT OF APPEALS

James Anthony Primus 252315 Appellate

v.

South Carolina Department of Corrections Respondent

**RECEIVED**

NOV 07 2019

SC Court of Appeals

Appellate Case No. 2019-001277

Initial Brief

Appointment of Counsel Second Motion

Certificate of Service

I have this day served a copy of the motion  
Appointment of Counsel was this date served upon  
the following individuals by placing a copy of the  
same via mail to his/her last known address

November 1 2019

S.C. Court of Appeals

P.O. Box 11629

Columbia S.C. 29211

Office of General Counsel

S.C. Dept. of Corrections

4444 Broadriver Rd

Columbia S.C. 29221

S.C. Administrative Law Court Clerk

1205 Pendleton St. Suite 224

Columbia S.C. 29201

By

James Anthony Primus 252315

James Anthony Primus Pro se

1516 Old Gilliard Road

Ridgeville S.C. 29472

James Anthony Primus 282365  
MacDougal Correctional Institution  
Birch unit 2 C 13 B  
1516 old Billard Road  
Ridgeville S.C. 29472

November 1 2019

S.C. Court of Appeals  
Jenny Abbott Kitchens clerk  
P.O. Box 11629  
Columbia S.C. 29211

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SC Court of Appeals

RE Appellate Case no 2019-001277

Dear clerk

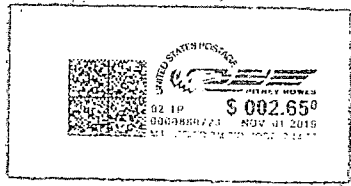
Please find enclosed Appellate motions to be  
filed in your office in the above mention case  
Amendments of Records Amendment of Counsel ~~motion~~ <sup>Appointed</sup>  
motion to Relax Court Rules

I would like to Thank you in advanced

Sincerely

James Anthony Primus Prose

FROM James Anthony Primus 29236  
MacDougal Correctional Institution  
Birch Unit 2 C 13 B  
1516 Old Gilman Road  
Ridgeville S.C. 29472



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SC Court of Appeals

MacDougal Correctional Inst  
Mailroom  
NOV 01 2019  
RECEIVED

TO SOUTH CAROLINA COURT OF APPEALS  
Jenny ABBOTT Kitchings clerk  
Post OFFICE Box 11629  
Columbia S.C. 29211

