

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM Richland County
Jocelyn Newmann, Circuit Court Judge

Appellate Case No. 2019-001175
Case No. 2019-CP-40-2137

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DEC 05 2019
SC Court of Appeals

George M. Adams, #181283, pro se, Appellant,

Richland County SHERIFFS DEPARTMENT, Et Al. Respondent.

Appellant's Motion For Production

Pursuant to Rule 34 of the South Carolina Rules of Civil Procedure, the Appellant (Plaintiff), George M. Adams, #181283, pro se, hereby Request that Respondent (Defendant), produce the following document within thirty (30) days from the date of service hereof. This request for production of document shall be continuing in nature until the day of trial, and you are instructed to serve supplemental responses to the extent required by South Carolina Rules of Civil Procedure.

DEFINITIONS

The definitions and instructions set forth below shall govern

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the following request for production of documents and things, as well as your response to them:

1. The term "documents" as used herein means all original writing of any nature whatsoever and all non-identical copies thereof in your possession, custody and control, regardless of where located, and regardless of whether printed, or reproduced by any process, or written and/or produced by hand, or stored in any form of mechanical or electronic information retrieval system, and whether or not claimed to be privileged or otherwise excludable from discovery, and including, but not limited to, records, correspondence, communications, reports, compilations, notices, statements, instructions, schedules, papers, books, letters, objects, transcripts of oral statements, court papers, follow-up reports, and arrest warrants.
2. The term "concerning" or "concern" as used herein means referred or referring to, alluded or to, related or relating to, connected with, regarding, describing or reflecting.
3. The term "you" or "your" as used herein shall mean the Richland County Sheriff's Department and all of its present and former agents, employees, representatives, attorneys and all other persons acting on its behalf.
4. The term "and" and "or" shall be both conjunctive and disjunctive.

5. The word "OCCURRENCE" MEANS THE JUNE 17, 1992 ARREST WARRANTS ISSUED BY W. H. WOMBLE, JR. WAVERLY MAGISTRATE OFFICE, 2712 MIDDLEBURG DRIVE, SUITE 106, COLUMBIA, SOUTH CAROLINA, 29204, WHICH IS THE SUBJECT OF THE COMPLAINT.

INSTRUCTIONS

1. You must serve a written response within thirty (30) days after service of this request. Your response must state that production and related activities will be permitted as requested or that the requested production is objected to, in which event the reasons for your objections must be stated.
2. Documents produced for inspection must be produced as they are kept in the usual course of business or be organized and labeled to correspond with the categories in this request.
3. For each document withheld from production on the ground of attorney client privilege, work product doctrine or any other privilege.
 - (A) Right to be secure in my persons, houses, papers, against unreasonable searches and seizures and unreasonable invasions of privacy shall not be violated, unless on warrant issued upon probable cause, supported by oath or affirmation, and
 - (B) ARREST WARRANTS D-369126, 27 FOR ARMED ROBBERY AND MURDER. AFFIANT INVESTIGATOR DAVID LAWRENCE, JUNE 17,

1992, Affidavit submitted to Judge Womble for the ARREST
of Appellant (plaintiff).

DATE:

Columbia, S.C. 29210

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GEORGE M. ADAMS #181283
Broad River Correction Institution
4460 Broad River Road
Columbia, S.C. 29210

cc: L

ANDREW F. LINDEMANN, ESQUIRE
5 CALENDAR COURT, SUITE 202 (29206)
Post Office Box 6923
Columbia, S.C. 29260

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CERTIFICATE OF SERVICE

I did this date SERVE RESPONDENT'S ATTORNEY, Andrew F. Lindemann
5 Calendar Court, Suite 202 (29206), Post Office Box 6923, Columbia,
S.C. 29260, by placing a copy of the same in a United States
postal service mail box, postage paid, and addressed above.



GEORGE M. ADAMS #181283

BROAD RIVER CORRECTION INSTITUTION
4460 BROAD RIVER ROAD
Columbia, S.C. 29210

RESPONDENT'S ATTORNEY

Andrew F. Lindemann, Esquire
5 Calendar Court, Suite 202 (29206)
Post Office Box 6923
Columbia, S.C. 29206

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BROAD RIVER CORRECTION INSTITUTION
4460 BROAD RIVER ROAD
COLUMBIA, S.C. 29210

Date:

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ANDREW F. LINDEMANN, ESQ.
ATTORNEY AT LAW

Post Office Box 6923
Columbia, S.C. 29260

RE: GEORGE M. ADAMS, #181283 v. RCSD
COURT OF APPEALS (CASE No. 2019-001175
CIVIL ACTION No. 2019-CP-40-2137

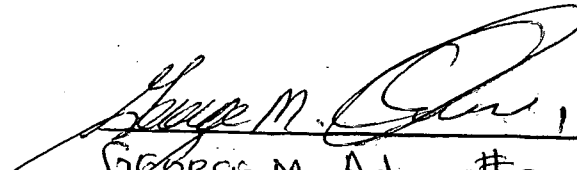
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SC Court of Appeals

DEAR COUNSEL:

PLEASE FIND ENCLOSED AND SERVED UPON YOU ARE APPELLANT'S
REQUEST FOR PRODUCTION.


George M. Adams, #181283

CC:
AFL/jmb
ENCLOSURE

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GEORGE M. ADAMS, # 181283
BROAD RIVER CORRECTIONS INSTITUTION
4460 BROAD RIVER ROAD
COLUMBIA, S.C. 29210



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THE SOUTH CAROLINA COURT OF APPEALS
JANNY A. KITCHINGS, CLERK OF COURT
POST OFFICE BOX 11629
COLUMBIA, S.C. 29211

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