

Court of Appeals  
STATE of SOUTH CAROLINA

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DEC 20 2019

SC Court of Appeals

STATE of SOUTH CAROLINA  
Plaintiff  
vs.

Case Nos. 2019GS391315-1316

GARY L. THOMAS  
Defendant

MOTION FOR APPOINTMENT OF  
COUNSEL AND PROVISION OF  
TRANSCRIPTS AT STATE  
EXPENSE

THE DEFENDANT-APPELLANT, GARY L. THOMAS, IS APPEALING THE ORDER OF CIRCUIT JUDGE LETITIA VERDIN AND MOVES FOR THE APPOINTMENT OF COUNSEL ON APPEAL AND THE PROVISION OF TRANSCRIPTS FROM MOTIONS HEARINGS HELD ON JUNE 19, 2019, AUGUST 23, 2019 AND OCTOBER 4, 2019 AS THEY PERTAIN TO THE ISSUES ON APPEAL.

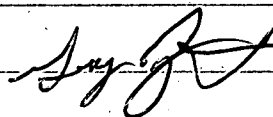
THE DEFENDANT-APPELLANT FURTHER REQUESTS THE PROVISION OF ALL MOTIONS FILED BY THE STATE AND GARY THOMAS (PRO SE) AS DESIGNATED MATTER ON APPEAL AS THEY PERTAIN TO THE ISSUES ON APPEAL.

THE DEFENDANT APPELLANT HAS BEEN DECLARED INDIGENT IN THE LOWER COURT

proceedings AND IN Appellate Case No.  
2019-000744 AND IS INCARCERATED WITH  
NO ABILITY TO PAY COSTS ASSOCIATED WITH  
THIS APPEAL.

Signed this 20th day of December, 2017.

Respectfully Submitted,



GARY L. THOMAS, 310751  
TRENTON CORRECTIONAL INST.  
89 GREENHOUSE RD.  
TRENTON, SC 29847

Amon De Bruijn  
Appointed in  
Lower Court  
Proceedings

TELEPHONE (864) 898-5857  
FAX (864) 898-5863  
E-MAIL  
PWELBORN@CO.PICKENS.SC.US

PICKENS COUNTY  
Harold P. "Pat" Welborn, Jr.  
P.O. BOX 215  
PICKENS, SC 29671

CIVIL RECORDS (864) 898-5862  
CRIMINAL RECORDS (864) 898-5864  
FAMILY COURT (864) 898-5598

**CORRECTION ON ATTORNEY APPOINTMENT:**

October 7, 2019

DEENDANT'S NAME: GARY ZACHARIAH THOMAS  
DEFENDANT'S LAST KNOWN ADDRESS: SCDC 310751  
84 GREENHOUSE RD.  
TRENTON, SC 29847

RE: STATE V GARY ZACHARIAH THOMAS  
WARRANT NOS.: 2019A3910100139; 7102P0941010;  
2019A3910200044; 51943EC

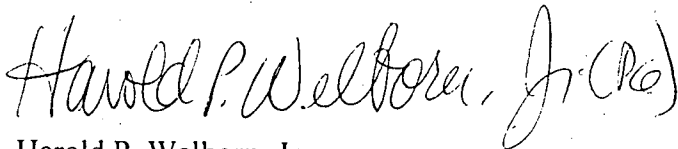
Dear Mr. Thomas:

Please be advised that pursuant to an Order signed by Judge Verdin on October 4, 2019,

**Linda Whisenhunt** was appointed to represent you on the above-referenced charges.

However, Ms. Whisenhunt contacted me and indicated that she has a conflict in representing you. Therefore, you have now been assigned **Aaron De Bruin** as your attorney. His address is **16 Wellington Avenue, Greenville, SC 29601**. You can reach him at **864-982-5930** to schedule an appointment to discuss your case with him.

Sincerely,



Harold P. Welborn, Jr.,  
Clerk of Court

Cc: John DeJong, Public Defender  
Baker Cleveland, Solicitor's office  
Aaron De Bruin, Attorney  
Linda Whisenhunt, Attorney

FORM 4  
NOTICE OF APPEAL FROM A SENTENCE IMPOSED BY THE COURT OF GENERAL  
SESSIONS

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

19 OCT 15 P 4:36

APPEAL FROM PICKENS COUNTY  
Court of General Sessions

CLERK OF COURT  
PICKENS COUNTY  
SOUTH CAROLINA

Letitia H. Verdin, Circuit Court Judge

Case No. \_\_\_\_\_

State of South Carolina,

Respondent,

v.

Gary Z. Thomas,

Appellant.

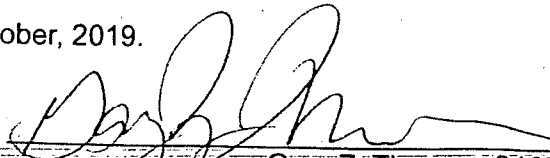
NOTICE OF APPEAL

Comes now indigent unlawfully incarcerated Defendant/Appellant, Gary Z. Thomas, and moves this Court for Orders effectuating:

1. The appointment of Counsel to Appellant in this case, and
2. The permission for the lower Court's file and transcripts of Motion hearings and proceedings from June 12, 2019, August 23, 2019, and October 4, 2019 to be mailed to the Appellant directly at state expense.

PLEASE TAKE NOTICE that the aggrieved Defendant, Gary Z. Thomas, appeals the order of Circuit Court Judge Letitia H. Verdin dated October 4, 2019, forcing Defendant to accept the appointment of counsel.

Respectfully submitted this 15th day of October, 2019.



Gary Z. Thomas, 310751  
Trenton Correctional Institution, 3DA27  
84 Greenhouse Road  
Trenton, South Carolina 29847



Thomas, G. <masonry.svcs@gmail.com>

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**Gary Zachariah Thomas**

2 messages

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**Thomas, G.** <masonry.svcs@gmail.com>

Mon, Nov 4, 3:01 PM

To: <ADEBRUIN@debruinlawfirm.com>

Mr. De Bruin:

Please be advised that I would like to be heard on the Moions I have filed in my case prior to being forced to acceppt appointment of counsel, despite "Law of the Case" principles being ignored by both Megan Owens and Judge Verdin. (See June 19, 2019 Order Appointing Counsel).

My Motion to Suppress is clear and has been entirely disregarded by the State and the Court — an issue I am appealing along with your appointment. Please assist in acquiring the transcripts of June 19, 2019, August 23, 2019, and October 4, 2019 illustrating my repeated insistence that I be allowed to proceed pro she, without being unlawfully prevented from doing so.

My Motion to Dismiss for Reasons of Double Jeopardy is priority also, considering I have been revoked in full for meth possession (as is stated in my Order of Revocation). Please see that hearings are promptly scheduled for my Motions and that the conditions which led to me being forced to accept appointment of counsel are addressed properly.

Sincerely,  
Gary Zachariah Thomas

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**Thomas, G.** <masonry.svcs@gmail.com>

Mon, Nov 4, 3:44 PM

To: <CMILLION@debruinlawfirm.com>

Ms. Chelsea:

I am forwarding to you this email and one other that I have sent to Mr. Aaron de Bruin. Please ensure that he gets back to me at his earliest convenience.

Thank you,  
Gary Z. Thomas

[Quoted text hidden]

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SC Court of Appeals

DECEMBER 4th, 2019

RE STATE V. GARY L. THOMAS  
PICKENS CO. CASE NOS 2019GS391315  
AND 2019GS391316

MOTION INCLUDED IN  
NOTICE OF APPEAR

DEAR CLERK OF COURT:

ENCLOSED, PLEASE FIND A COPY OF THE NOTICE OF APPEAR THAT WAS FILED ON MY BEHALF IN THE ABOVE-REFERENCED CASE. A COPY WAS MAILED TO THE APPELLATE COURT, BUT I HAVE RECEIVED NO NOTICE THAT IT HAS BEEN RECEIVED BY THE COURT TO DATE.

I AM ALSO ENCLOSING A COPY OF THE LETTER I RECEIVED FROM THE PICKENS CO. CLERK APPOINTING AARON DEBRUN AS MY ATTORNEY. MR. DEBRUN HAS THIS FALL REMAINED UNRESPONSIVE TO MY INQUIRIES REGARDING MY CASE AND HIS INTENT TO REPRESENT ME. (SEE ENCLOSED EMAIL DATED NOVEMBER 4, 2019)

DUE TO MR. DEBRUN'S SILENCE I AM HERELWITH SUBMITTING A MOTION FOR APPOINTMENT OF APPELLATE COUNSEL AND PROVISION OF TRANSCRIPTS AT STATE EXPENSE. THERE ARE

THREE SETS OF TRANSCRIPTS (IDENTIFIED IN THE ENCLOSED EMAIL TO DeBRUIN) THAT ARE NEEDED AND RELEVANT TO MY APPEAL: OCTOBER 4, 2019 MOTION HEARING; AUGUST 23, 2019 MOTION HEARING; JUNE 19, 2019 MOTION HEARING.

PLEASE NOTE THAT I AM UNABLE TO COMPLY WITH SERVICE REQUIREMENTS UNDER THE APPELLATE COURT RULES BECAUSE SCDC WILL NOT COPY HANDWRITTEN PLEADINGS AND I HAVE NO OTHER WAY TO DRAFT THEM.

PLEASE ADVISE ME OF THE STATUS OF MY REQUESTS/MOTIONS WHEN DECISIONS ARE MADE AND SERVICE IS COMPLETED THANK YOU.

SINCERELY,



CARY L. THOMAS 310751  
89 GREENHOUSE RD  
TRENTON SC 29847

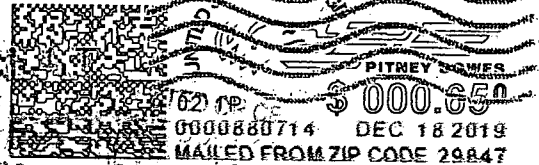
PS

PLEASE RETURN CLOCKED COPIES.

CAN... THOMAS, 310751, 3A53  
TRENTON CORRECTIONAL INST.  
84 GREENHOUSE Rd  
TRENTON, SC 29847

AUGUSTA GA 309

THE DEPARTMENT OF CORRECTIONS  
STATE OF SOUTH CAROLINA  
ASSUME RESPONSIBILITY FOR THE  
CORRECTIONAL INSTITUTION, S.C. DEPARTMENT OF CORRECTIONS



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DEC 18 2019

DEC 20 2019

SC Court of Appeals

LEGAL MAIL

SC COURT OF APPEALS  
ATTN: Ms. Jenny KIRKINGS, CLERK  
P.O. BOX 11629  
COLUMBIA, SC 29211

29211+1629

