

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Milton G. Kimpson, Administrative Law Judge

ALC Case No: 19; ALT-04-306-AP

Appellate case No: 2019-001566

Jack Huykendall,
#355988

Appellant,

v.

South Carolina Department of Corrections,

Respondent

RECEIVED

MAR 17 2020

SC Court of Appeals

Motion of order for SCDC to Disclose
Proof of Claim

The appellant above listed ask the South Carolina department of Corrections to produce to the court of appeals all of the following restricted and non-restricted documents and allow the appellant to inspect all such items.

The appellant acknowledges that for the appellant to possess a number of the following documents could place the institution or SCDC at a security risk however to allow the court possession of the documents and the appellant the opportunity to inspect such items of documents allows for no security or safety risk to this institution or SCDC. If SCDC claims or sites "Security threat or Issues" The appellant moves for documentary proof and proof of how the threat or issues exists.

The appellant also sites "The freedom of information Act" in requesting all of the following documents and information.

The appellant ask SCDC Evans Correctional Institution to produce all of the following information documents and records,

1.) Kiawah dorm officer and operation log books for both sides of the dorm between May 8, 2019 to June 17, 2019 to show the amount of lockdown, all movements, and other such information as policy states all things done must be placed in the dorm log books.

2.) Law library logs for May 8, 2019 to June 17, 2019 showing all admission into the law library by all inmates and dorm location.

3.) Mailroom log sheets, sign up sheets, and all other documentary proof of inmate access to the Evans CI mailroom either affirming or denying inmate in Kiawah dorm access to the mail room.

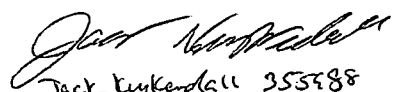
4.) Classification to produce proof or other such evidence showing the appellant was placed in Kiawah dorm while the time of this claim was a gang infested unit (STG) security threat group. which further deprived appellant of ability to file with the courts.

5.) Evans _____ Personals warden Stonebraker, A/nd security ~~Graves~~ A/w Programs, and Major Graves - validate through policy how appellant was placed on continued lockdown, who validate the dorm lockdown, why appellant was deprived access to the courts; and what administration did or is doing to correct and prevent further deprivation to appellant since he was denied access again on Feb. 27, 2019 due to being lockdown.

Appellant acknowledges understanding in this may not be the correct procedure in obtaining the above requested documents that are discoverable materials, however the above requested material of documents will validate the claim of deprivation in filing and meeting Administrative Law Court deadlines for filing and will become subjected to disclosure at a later date.

But all evidentiary matters and documents must be made available if they validate or disprove the claim made against the South Carolina Department of Corrections in regards to denial of access to the courts as the SCDC has policies in place to prevent this exact thing, and would validate appellant initial claim of policy violation in the institutional claim in regards to the class II escape #902.

Respectfully Submitted by:


Jack Kykendall 353988
Evans IA-196
610 highway 9 west
Bennettsville, S.C. 29512

3-2-20

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Milton G. Kimpson, Administrative Law Judge

Lower Case No: 19-ALJ-04-0306-AP
Appellate case No: 2019-001566

RECEIVED

MAR 17 2020

SC Court of Appeals

Jack Kuykendall,
#355988

Appellant,

v.

South Carolina Department of Corrections,

Respondent.

Certificate of service

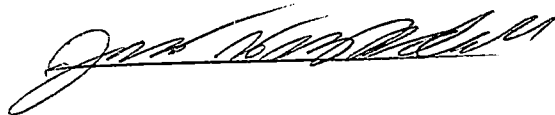
I hereby certify a copy of the foregoing motion was this date served upon the following individuals by placing a copy of the same via mail to his/her last known address as follows:

Cheron Hoss
Administrative Asst, Office of General Counsel
S.C. Dept of Corrections P.O. Box 21787
4444 Broad River Rd
Columbia, S.C. 29201
(803)896-3922

State of S.C.
Administrative Law Court
Edgar A. Brown Building
1205 Pendleton St. suite 224
Columbia, S.C. 29201

S.C. Court of Appeals
P.O. Box 11629
Columbia, S.C. 29211

Jack Kuykendall 355988
Evans CI 2A-196
610 highway 9 west
Bennettsville, SC, 29512



3-2-20

Jack Kaykendall SCDC 355988
Evans of 2A-196
Colo highway 9 West
Bennettsville, S.C. 29512

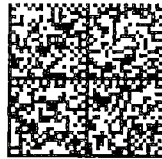
RECEIVED


MAR 17 2020

SC Court of Appeals

MAR 13 REC'D

S.C. Court of Appeals
P.O. Box 11629
Columbia, S.C. 29211



UNITED STATES POSTAGE

PITNEY BOWES
02 1P \$ 000.80⁰⁰
0000880240 MAR 13 2020
MAILED FROM ZIP CODE 29512

SCDC

APR 9 2020

MAIL ROOM