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JAN 14 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Robert Young, Circuit Court Judge

Case No. 2021CP1003564

Small Claims Court

Martelle Morrison, Small Claims Judge

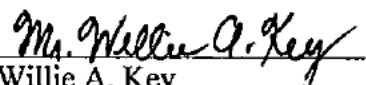
Case No. 2021CV1010600964

Veterans Affairs et al., Respondents,
v.
Willie A. Key, Appellant.

MOTION TO APPEAL
IN FORMA PAUPERIS

I, Willie A. Key, state that I am the appellant in the above-entitled case. In support of my motion to appeal *in forma pauperis* I state that because of my poverty I am to pay the cost of this appeal or give security therefore; and I believe I am entitled to redress.

January 12, 2022.


Willie A. Key
71 Society St., Apt. 501
Charleston, S.C. 29401
(843) 530-0384
Pro se

Other Counsel of Record:

Vivian C. Fairbairn (S.C. Bar # 12052)
22 WestEdge Street, Suite 300
Charleston, S.C. 29403
Attorney for Respondent MUSC and
Its President, David Cole

Office of General Counsel
Ralph H. Johnson Medical Center
109 Bee Street
Charleston, S.C. 29401

**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS**

I, Willie A. Key, am the petitioner in above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the cost of this case or give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months.

Income Source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Self-employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Gifts	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance payments)	\$ <u>712</u>	\$ <u>1,177</u>	\$ <u>712</u>	\$ <u>1,177</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly income:	\$ <u>712</u>	\$ <u>1,177</u>	\$ <u>712</u>	\$ <u>1,177</u>

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross Monthly Pay
<u>NA</u>	_____	_____	\$ _____
_____	_____	_____	\$ _____

_____ \$ _____

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross Monthly Pay
<u>NA</u>	_____	_____	\$ _____
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

4. How much cash do you and your spouse have? \$ _____
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
<u>checking</u>	\$ <u>80</u>	\$ <u>215</u>
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

- | | |
|---|--|
| <input type="checkbox"/> Home
Value <u>NA</u> | <input type="checkbox"/> Other real estate
Value <u>NA</u> |
| <input checked="" type="checkbox"/> Motor Vehicle #1
2017 Subaru Forester
Value <u>\$17,050</u> | <input type="checkbox"/> Motor Vehicle #2
Year, make & model
Value _____ |

Other assets
Description NA
Value _____

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
<u>NA</u>	\$ _____	\$ _____

_____ \$ _____ \$ _____
 _____ \$ _____ \$ _____

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name	Relationship	Age
<u>NA</u>	_____	_____
_____	_____	_____
_____	_____	_____

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	\$ <u>217</u>	\$ <u>217</u>
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>45</u>	\$ <u>45</u>
Home maintenance (repairs and upkeep)	\$ <u>0</u>	\$ <u>0</u>
Food	\$ <u>215</u>	\$ <u>215</u>
Clothing	\$ _____	\$ _____
Laundry and dry-cleaning	\$ <u>20</u>	\$ <u>10</u>
Medical and dental expenses	\$ <u>0</u>	\$ <u>120</u>
Transportation (not including motor vehicle payments)	\$ <u>30</u>	\$ <u>60</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>0</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>0</u>
Life	\$ <u>65</u>	\$ <u>35</u>

Health	\$ <u>0</u>	\$ <u>148</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>160</u>
Other: _____	\$ _____	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): Auto _____	\$ <u>0</u>	\$ <u>90</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Credit card(s)	\$ <u>0</u>	\$ <u>0</u>
Department store(s)	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ _____	\$ _____
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ _____	\$ _____
Total monthly expenses:	\$ <u>592</u>	\$ <u>1,100</u>

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

Yes No If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? Yes No

If yes, how much? _____

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

Yes No

If yes, how much? _____

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 12, 2022.

Ms. Willie A. Zep

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PROOF OF SERVICE

I certify that I have served the Motion to Appeal in Forma Pauperis and Affidavit on the defendants by depositing a copy of same in the U.S. Mail, postage prepaid addressed as shown below.

January 12, 2022.

Mr. Willie A. Key
Willie A. Key
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Mr. Willie A. Key
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