

**DENIED**

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2012 DEC -6 AM 8:1

*Henry C. Wooten*  
TERRY L. WOOTEN  
U. S. DISTRICT JUDGE

DATE  
*12-5-12*  
*Brooks 1*

THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
*Thomas Reynolds Brooks,*  
*Plaintiff,*

C/A No. 4:11-cv-03362-TLW-TEN

*vs.*  
THE SOUTH CAROLINA DEPARTMENT OF  
CORRECTIONS, et al  
LEE CORRECTIONAL INST., et al  
F. Z. H. LAND COUNTY PUBLIC DEFEN-  
DORS OFFICE, et al  
Defendants

① MOTION FOR LEAVE TO FILE A SUPPLE-  
MENTAL COMPLAINT; ② MOTION FOR PRES-  
ERVATION OF EVIDENCE MATERIAL TO CAUSE  
OF ACTION; ③ MOTION FOR SERVICE OF  
PROCESS ON OPERATIONS in General; ④  
MOTION FOR LEAVE TO CONDUCT DIS-  
COVERY.

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DEC 13 AM 10:55

HEREIN THE plaintiff in civil action No. 4:11-cv-03362-TLW,  
motions upon the court for leave pertaining to the (4) listed motion re-  
quests herein. THE plaintiff, pro se will attempt to address these  
issues to establish "Good Cause" for the Courts destruction to Judge-  
ment in favor of plaintiff pro se, AS a matter of law.

HEREIN THE plaintiffs requests for leave to file a supplemental  
complaint deals with a issue with wife MAY DEAN and wife  
LT. JANE DOE and wife S. C. I. I. that these three alleged  
that some type of security issue arose between me and  
John Doe I. I. wife that I lack any knowledge of pertaining  
to some alleged argument etc., that lead John DOE I. I.  
to address some previous issues to LT. JANE DOE, sponsor of  
The Florence unit who referred to alleged situations to MAY  
DEAN, HEAD of Security Unit at L. C. I.

Braska

on 08-01-2012, I, MAJ. DEAN D. DEAN, OF THE name at L.C.I. before  
LT. JANE DEE, and ONE CAPT. COMMANDER, THE plaintiff.  
was threatened and forced to sign protective custody papers  
concerning a incident he lacked knowledge of nor had any  
involvement in, that was brought forth by 'I'm John Doe, who  
threw me in the situation because he wanted a room  
change because i ~~was~~ want talk to him at night when  
i'm trying to sleep and he what's to worry me about his  
problems that he got himself in- to when i have my own  
problems that have been brought upon by others causing  
me additional stress and aggravation deal with and  
being around individuals with different personalities.  
that i don't know nor care to involve in my personal  
and or private life for the record. IT is upon my belief  
that the admn, here at L.C.I. and the staff that coordin-  
ates A.T.V, which is a substance abuse program that i took  
upon myself to be a part of to overcome my substance abuse  
issues and certain things that help the staff coordinate  
programs or trying to document shunned-up uncollaterated  
incidents to get me kicked out of the A.T.V, program. MAJ.  
Denny Force MO on 08-01-2012, to sign P.C. papers saying  
that i did not fear for my life and that i did not what  
P.C, it is upon my belief that due to the status quo, or  
uncovery of this criminal and or civil conspiracy  
and or controversy and the fact that L.C.I. adm

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admin., security, medical, etc. has been made aware of my innocence and the ~~Richard~~ county parties attempt to force me to suffer the consequences of criminal acts of law enforcement etc. due to bad faith the incident report that is attached to the consent signed statement and form indicating that you do not fear for your life may be altered and swept out to address a more broader or over broader issue that was not the topic of the forced signing of this paperwork concerning a incident i had no knowledge of other than a lack of communication with Ila John Doe, all parties are defendants in CIA NO 4: 11-cv-03262-TW, and I ~~was~~ <sup>went</sup> under the threat of being placed on lock-up during the month of Ramadan where i'm trying to fast as a Muslim without all the feckishness that has manifested at this ~~prison~~ prison, also were i have a up coming P.C.R. hearing that is possibly coming up ~~on~~ on the 10th date of the week of Sept. 2012 and i dont have time to be writing the law lia board from lock-up and waiting 4 weeks for the material that i wish to view. In addition even in general population for the record the plaintiff is not getting adequate law library time to perfect suit pro se, and ~~or~~ to assist P.C.R. attorney of avenues for grounds that i feel that petition should be attacked on.



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HERE IN FOR THE RECORD THE PLAINTIFF REQUESTS THAT THE FOLLOWING INFORMATION RATHER STATEMENTS, ORALLY STATED, WRITTEN, ANY AND ALL PHYSICAL EVIDENCE AND OR REPORTS OR DOCUMENTS ETC., OF RECORDS OF CONTRABAND ~~OR~~ CONTRABAND FROM INMATES AND OR STAFF AT "CELL PHONES" (THAT OR BEING USED TO COORDINATE CRIMINAL ACTS AND OR NUISANCE), "DRUGS", "WEAPONS", AND ALL INCIDENT REPORTS, INSTRUCTIONS AT INMATE ~~DATE~~ OFFENDERS OF DISCIPLINARY REPORTS AND HEARING RECORDS OF (B.C.D.C. 19-69) FORMS THAT HAVE BEEN IN POSSESSION AND OR UNDER THE USE AND INFLUENCE OF DRUGS FROM PLAINTIFF'S ARRIVAL FROM 11-10-2012 THROUGH THE PLAINTIFF ALSO REQUESTS THAT THE FOLLOWING D.C. D.C. FORMS BE SET FORTH DEALING WITH ABOVE REQUESTS B.C.D.C. 19-29A, AND ANY AND ALL OUTSIDE ILLEGAL CHARGES WHICH MAY HAVE BEEN SERVED BY THE THE SHERIFF OF LEE COUNTY WITH CIVILIAN VIOLATORS TRYING TO ~~BRING~~ <sup>SMUGGLE</sup> CONTRABAND INTO THE INST, BY ANY AND ALL MEANS NOT TO JUST DIRECT THE PRESENCE OF CONTRABAND IN ITS MOST HARMFUL SCOPE CONCERNING ITS ONGOING PRESENCE AND THE CONSEQUENCES THAT PEOPLE <sup>MAY</sup> ~~NOT~~ <sup>BE</sup> INVOLVED SUFFER FOR THOSE INVOLVED. THIS INCLUDES STAFF ~~WHO~~ WRITE-UPS ON B.C.D.C. 19-29A FORMS ETC. WHO MAY HAVE BE PUNISHED FOR FAILURE OF A STANDARD, DUTY AND OR SPECIAL CARE OF SECURITY AWARENESS, ACTION, AND PREVENTION ETC., AND OR WHO MAY ALSO STILL RETAIN THESE POSITIONS. THIS ALSO INCLUDES OFFICERS HAVING BEEN CAUGHT AT ADMITTING

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Inmates in moves and or bringing contraband in themselves  
to inmates to cell. For "Green dots", green dots or visa  
cards that have a 12 or 14 digit number that is giving  
to these items by friends and or family on the streets  
where these digit numbers or giving to the dealers of  
the contraband with whatever amount that ~~is~~ is placed  
on the Green dot cards for ~~the~~ ~~graph~~. The cell phones  
or the main and most used way to make easy this  
transaction and the cell phones also or used to coordinate  
with ~~the~~ individuals in society and or organizations to  
coordinate the movement to get the contraband over  
the rec. hold fences to inmates. We have have made  
keys to unlock rec. hold doors, room doors of  
other inmates they wish to kill, beat up, rape, etc.  
when they evade security devices which is another  
SCDC 19-29A etc report request along with  
all institutional, departmental, security, administrative,  
and ~~and~~ and all investigative agencies inside and out  
side of the Department of Corrections that have a  
record of any and all security breach that has  
been made from 11-10-2010 thru — which is  
material to the cause of action and should be set  
forth pursuant to S.C. Code Ann. §§ 19-21-30,  
19-21-40, 19-21-70. And where good cause exists pursuant  
to S.C. Code Ann. § 17-27-150 supra. Rule 11, S.C.R.C.P.

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Herein pursuant to S.C. Code Ann. § 15-9-210, the plaintiff requests due to safety concerns that the representative capacity of the South DOC I/M party to this Joinder be served upon a agent that is not connected with LEE C.I., as a matter of law due to safety concerns that may affect Plaintiff's safety, life, treatment concerns which could cause additional emotional distress if he is retaliated upon by the I/M population and the staff and or admin., who he is forced to be housed with, be around, abide to and or rely on pertaining to the admin, officers, and inmates.

Herein the plaintiff requests the full and or actual names and Identification numbers of all defendants rather employees and inmates of this person. Joinder from all parties as defendants in this suit from the Richland County defendants to the LEE CORRECTIONAL Inst. defendants. This request is also directed at locations of businesses and or places where service can be served on individuals and groups of defendants to accede all parties and plaintiffs interest pertaining to the earliest conveniences pertaining to the service of process. Pursuant to S.C. Code Ann. § 17-27-150, Rule 71.1 of the South Carolina Rules of Civil Procedure, and on the grounds that good cause exists to allow this discovery to proceed.

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Herein finally, the plaintiff, requests a special order from the courts to perpetrate telephone records from a establishment named "Pop's New York PIZZA WINERS AND HOAGIES", that was requested of by plaintiff to the appointed attorney John Ruedas Bailey, Richland County public defenders office, Richland County Judicial Center, 1701 MAIN St., Columbia, S.C. 29201, where he subataged the previous subpoena # 2009954001154, thru Bell South # BST09068325, that was received on 03-26-2009 at the subpoena center located at 208 S Akard 10th Floor Dallas, TX 75202 (214) 263-2137 by Ms. Karen Lervington, and or Ms Jennette Smith, (214) 269-2300. which address the issue of trunk numbers etc, in the disclosure of an alleged phone call coming into POP'S NY PIZZA to order a pizza and mozzarella sticks which could only be at call # 15 that came in from (803) 261-3830 at 22:10:03hrs and ended at 22:12:44hrs which would represent the same approx time on pizza receipt which would give the investigation a prime suspect and not a attempt to convince a jury and deceive a judge concerning rather i had involvement in allegation thru the phone records of who owned this call in respects to the pizza receipt, where time derives from the receipt, location etc, things that have been asserted




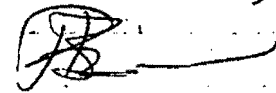
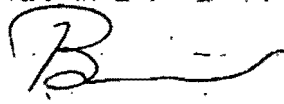
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to put me to this location at this specific time by proof of this document. The number (303) 261-3830 at Call number 95 is a trunk number this same number represents the Carrier obviously and this number pops up on the telephone log when I was at work on the clock etc, and even after the arrest for this alleged incident where there would be no way I could have made the calls and or call. I have sent the telephone records in a prior ~~document~~ prima facie showing to the Court if the date is unknown at this time and I need these records not only to prove my innocence but for the <sup>gross</sup> ~~gross~~ <sup>neglect</sup> ~~neglect~~ <sup>of a</sup> ~~of a~~ <sup>matter</sup> ~~etc~~ entrusted upon him pursuant to DR 6-10(A) of the Code of Professional Responsibility to perfect claim against defendants in their on individual conspiracies as a matter of law pursuant to S.C. Code Ann. 17-27-150. Rule 71-1 of the S.C.R.C.P.

Finally, this motion is supported by the pleading in the Complaints and or Complaints in hole and part of CIA NO. 4:11-CV-03362-TLW. and all supporting evidence of all prima facie showings of this genuine issue, before the Court and or thru all motions submitted etc, and all applicable statutes and case authority, <sup>the</sup> ~~most~~ applicable, Rules of Civil procedure, and such other evidence and

authority as the court may find it <sup>appropriate</sup> ~~appropriate~~  
to consider. BROOKS 10

Respectfully,

    
# 08-03-2012