

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Roger Dyke, Ferris Singley,  
Wendell Beverly, David Pate,  
Nathan Teague, Matthew Clark,  
Robert Dunn, Louis Beville,  
Vinson Filyaw, Travis Moore,  
Darius Williams, Karlton Brockman,  
Curtis McLeod, Cordell Lewis,  
Fareed Malkeen, Tristan Gist,  
Matthew Blakley, Sean Groubert,  
Montavious Winkfield, John Andrews  
Tequan Brown, Larry Heyward,  
Ralph Norman, Michael Norton,  
John Dickerson, Todd Kohlhepp  
Jeffery Freeman, Timothy Rainey,  
Plaintiffs,

Vs.

Michael Staphen, Lisa Young,  
Anite Stevens,  
Laura H. Kawaguchi  
Defendants

C/A No.

Complaint

Sued Individually  
and in their  
official capacities

(Jury Trial Demanded)

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USDC CLERK, COLUMBIA, SC  
2018 FEB - 9 AM 10:15

## I. JURISDICTION & VENUE

- 1.) This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under Color of state law, of rights secured by the Constitution of the United States. The Court has Jurisdiction under 28 U.S.C. Section 1331, and 1343 (a) (3). Each Plaintiff Claims for injunctive relief are authorized by 28 U.S.C. Section 2283 + 2284 and Rule 65 of the Federal Rules of Civil Procedure.
- 2.) The Columbia Division of the District of South Carolina is an appropriate venue under 28 U.S.C. Section 1391 (b) (2) because it is where the events giving rise to this claim occurred.

## II. PLAINTIFFS

- 3.) Plaintiff, Roger Dyke, Ferris Singley, Wendell Beverly, David Pate, Nathan Teague, Matthew Clark, Robert Dunn, Louis Reville, Vinson Filyaw, Travis Moore, Darius Williams, Karlton Brockman, Curtis McLeod, Cordell Lewis, Fareed Makeen, Tristan Gist, Matthew Blakley, Sean Groubert, Montavious Winkfield, John Andrews, Tequan Brown, Larry Heyward, Ralph Norman, Michael Norton, John Dickerson, Todd Kohlhepp, Jeffery Freeman, Timothy Rainey

is and was at all times mentioned herein, and each Plaintiff is a Prisoner of the State of South Carolina Department of Corrections, State - Wide Protective Custody, in which is housed currently at Broad River Correctional Institution in Columbia, South Carolina.

### I I I . DEFENDANTS .

- 4.) Defendant Michael Staphen, is currently the Warden of Broad River Correctional Institution in which he is legally responsible for the operation of B.R.C.I., and the state-wide Protective Custody Program, and the welfare of all the inmates within B.R.C.I.
- 5.) Defendant Lisa Young is a Correctional officer with the rank of Captain/ Unit Manager over R.H.U., and State - Wide Protective Custody unit. Who, at all times mentioned in this Complaint, and she is assigned to Broad River Correctional Institution.
- 6.) Defendant Anite Stevens is a Correctional officer with the rank of Sergeant, and currently assigned to Broad River Correctional Institution who, at all times mentioned in this Complaint.

7.) Defendant Laura H. Kawaguchi is the Divisional Assistant Director of State Classification, Who is at all times mentioned in this Complaint, is responsible for each inmate's Classification Plan.

8.) Each Defendant is sued Individually and in his or her official Capacity, At all times mentioned in this Complaint each defendant acted under Color of state law.

#### IV. INTRODUCTION, AND FACTS

9.) The state-wide Protective Custody Program is the outline management, and administrative requirements related to the operation of a (RHU) Restrictive Housing Unit within the SCDC for housing of inmates who have been identified as requiring Protective Custody, or Protective Concerns.

10.) Every Inmate within (SWPC) are under Protection from the general inmate Population, and therefore not for Violating any of the SCDC Procedures, nor have, or has any Committed a Criminal act within the agency.

- 11.) Inmates in SWPC are subject to the same Rules, Regulations, and Policies (see SCDC Policy/ Procedure OP-22.14, i.e. Inmate Disciplinary System) as General Population Inmates.
- 12.) The SWPC unit was moved from Perry Correctional Institution in Pelzer, South Carolina, to Broad River Correctional Institution on or about December 12<sup>th</sup>, 2016.
- 13.) Since moving to Broad River Correctional Institution The Plaintiff Class, under the management of the Defendants, Michael Staphen, Lisa Young, and Annite Stevens, is subjected to harassment, abridgement of civil rights, Discrimination, denied Privileges, and are force to engage in to unwanted Sex acts.
- 14.) The Defendants have discriminated, and Continue to discriminate against the Plaintiffs Class.
- 15.) The Defendants routinely denies the Plaintiffs the opportunity to participate in a variety of Services, Programs, and activities, available to other inmates, such as drug treatment (even where a condition of an inmate's Sentence or necessary for Parole).

- 16.) The Defendants deny the Plaintiff Class the opportunity to equally participate in, and benefit from a variety of services, programs, and activities, and unequal opportunities at Correctional Rehabilitation. For example
- 17.) Within the SWPC unit inmates perform many duties as the same the general population inmates such as: Food service, Barber, Librarian, maintenance, Laundry, and Dorm worker, but, however, inmates within SWPC don't receive the same work credits for the work rendered as other inmates in General Population.
- 18.) Inmates in SWPC receive the lowest amount of (EWCs) i.e. Earn Work Credit allowed for the same jobs performed as an GP Inmate who receives EWC at a level of:

### EXAMPLE

<u>Custody</u>	<u>Level</u>	<u>Full-Time</u>	<u>Part-Time</u>
MO	2) 5 days/wk	2.50 Credit/wk	1.25 Credit/wk
MoR	2) 5 days/wk	2.50 Credit/wk	1.75 Credit/wk
MI	3) 5 days/wk	1.19 Credit/wk	0.595 ct/wk
MI	3) 7 days/wk	2.33 Credit/wk	1.17 ct/wk
ME	5dy. (ME) Disciplinary	0.7142 Credit/wk	0.3571 ct/wk
ME	7dy. Disciplinary	1.40 ct	0.70 ct/wk
CL	5dy. P.C. 1,2,3.	0.51 ct. wk	0.255 ct. wk
CL	7dy Pc 1.2.3	1.00 ct/wk	0.50 ct/wk

- 19.) Inmates in General Population With Paroleable Sentences receives 180 days Earned Work Credit and, or Educational Credits, as to SWPC Inmates with same Categorical Sentences only receive 90 days Per 12 months period.
- 20.) Inmates in General Population with No parole Sentences can receive up to 72 days EWC and Edu Credits Per 12 Months Period, but for those in SWPC they can only receive 36 days Per 12 months Period.
- 21.) Because of this discrimination in the Classification status the Plaintiff Class are required to serve longer Sentences.
- 22.) Inmates in SWPC are out-right denied the opportunities to obtain GED, or any other Educational, or rehabilitation Programs, available to GP inmates.
- 23.) The Plaintiff Class has repeatedly request to Defendant Laura H. Kawaguchi for an equal Classification Plan for SWPC inmates, because equal work equal Credits.

- 24) Under the Current Classification Plan the Plaintiff Class are subjected to (1) one phone call per 24 hour period, as to general population inmates have no limitation on phone usage with a 24 hour period.
- 25) Since being under the management of Defendants Stephan, Young, and Stevens, The plaintiff Class has been, and continually are being deprived of liberty, and due process.
- 26) Defendant Young, and Stevens often subject inmates in SWPC to disciplinary sanctions without first affording the Plaintiff Class to a disciplinary hearing.
- 27) This is the common practice of Lisa Young, the unit manager of RHU, is to lock down inmates for weeks at a time for so call violating rules, without affording the opportunity to be heard, or the ability to call witnesses, present evidence, or given notice of charges, and most important the opportunity to be judge by an impartial decision maker.

- 28.) At Broad River Correctional Institution the living conditions is cruel in itself. SWPC inmates are deprived of medical care in general, the defendants deny SWPC inmates the opportunity to medical care such as sick call, check ups, dental, and most important mental health.
- 29.) Currently there are 37 inmates within SWPC 27 of which are on the mental health case load, plaintiffs Winkfield, Dyke, Freeman, and Pate are at a high risk of death, and are in a serious need of mental health, due to several attempts of suicide.
- 30.) Winkfield, and Dyke attempt suicide 2 times in every week by cutting, or stabbing themselves, but they are routinely denied the serious mental health care that they need so badly.
- 31.) SWPC inmates living conditions is cruel, the plaintiff class is subjected to cells without ventilation in extreme heat, and cold, with urine, and feces on the floor, and are in constant fear of violence from Lisa Young, and Stevens.

- 32.) Both young, and Stevens are gang affiliated Lisa young traffick in drugs from the streets for Inmate Courtney Pauling a high ranking gang member, which young distributes Tee, Crank, and Crack Cocaine for inmates in SWPC (Freeman, and Dickerson).
- 33.) Due to the drugs being so strong it Plays with both Plaintiff's Mental Health, which makes SWPC a unsafe environment, which is failing to protect each inmate within State-wide Protective Custody.
- 34.) Also dealing with living Conditions, Inmates in SWPC have no unit Furniture, no tables, or Chairs, however, SWPC Inmates are allowed to buy Tvs, Hot pots, Electric Razor, Electric trimmers, Type Writers but the defendants has failed to install power outlets in the cells as it was at Perry Correctional Institution.
- 35.) The Defendants has Violated their own Policies, and have continually discriminated against each Plaintiff.
- 36.) Defendants young, and Stevens have engaged in Sexual acts with inmates in SWPC, Stevens gives Sexual favors to at least one inmate

in SWPC.

- 37.) Defendant Young have influence, Promise, threaten Plaintiff Brown, and Dyke to strip naked and was made to Place their hands on top of their heads while she Place her hands on they Penis.

#### V. Exhaustion of Legal Remedies.

- 38.) The Defendants Prohibited the Plaintiff's Class from the use of the Prisoner grievance Procedure, but, however, the Plaintiff's Class did use the Inmate Representative Committee Procedure.

#### VI. Legal Claims

- 39.) Plaintiff Class reallege and incorporate by reference Paragraphs 1-38.
- 40.) The Defendants Collectively discriminated against the Plaintiff Class. Violating each of the following Constitutional Rights:
- 41.) 1<sup>st</sup> Amendment Violation - For the denial of access to providing legal materials West law Computer, and books.

42.) 4<sup>th</sup> Amendment Violation- For the Strip Search of SWPC inmates while Influencing, Promising, threatening SWPC inmates Safety, Custody, Privacy, housing, Privileges, work detail or Program status in exchange for sexual favors. (False Imprisonment)

43.) 8<sup>th</sup> Amendment Violation - Living Conditions, due to the drugs the defendants trafficking in to a State Prison, the denial of Medical Care, and Disciplinary treatment.  
Cruel and unusual Punishment.

44.) 14<sup>th</sup> Amendment Violation - For the Discrimination and unequal treatment, denial of Procedural due process. Violation of Equal protection of the laws.

### VII. PRAY FOR RELIEF

45.) WHEREFORE, The Plaintiff Class request respectfully that the Court enter Judgment:

46.) Granting the Plaintiff Class a Declaratory that the acts and omissions described herein Violated they rights under the Constitution and laws of the United States, and

- 47) A Preliminary, and Permanent injunction ordering the Director of SCDC to stop the Defendants unlawful acts, and have SLED Investigate both Young, and Steven. The plaintiff Class also request for an Permanent Restraining order against Defendants Young, and Stevens for the lifetime of SWPC being housed at Broad River Correctional Institution for the safety of each member of the Plaintiff Class.
- B) A Permanent injunction ordering Defendant Laura H. Kawaguchi to prescribe a equal more fair Classification Policy for inmates in the state-wide protective custody for job/work credit.
- 48) Granting each Plaintiff Compensatory damages in the amount of \$375,000.<sup>00</sup> against each Defendant jointly.
- 49) Plaintiff Class seeks punitive damages in the amount of \$750,000.<sup>00</sup> Plaintiff Class seeks these damages against each Defendant.
- 50) Plaintiff Class seeks a jury trial on all issues

- 51.) Plaintiff Class also seek recovery of the cost of this suit, and
- 52.) Any Additional relief this Court deems just, Proper and equitable.

### VERIFICATION

Each member of the plaintiff class have read the foregoing Complaint and hereby verify that the matters alleged therein are true, and that each member certify under penalty of perjury that the foregoing is true and correct.

Roger Dyke #347604	Tristan Gist #360192
Ferris Singley # 211565	Matthew Blakley #370636
Wendell Beverly # 274366	Sean Groubert # 373545
David Pate #341659	Montavious Winkfield # <sup>354763</sup>
Nathan Teague #271416	John Andrews #350034
Matthew Clark #277574	Tequan Brown #341915
Robert Dunn # 362136	Larry Heyward #369902
Louis Reville #	Ralph Noman # 371759
Vinson Filyaw # 324082	Michael Norton # 374034
Travis Moore #227771	John C. Dickerson #
Darius Williams #351629	Todd Kohlhep #372454
Kariton Brockman #312952	Jeffery Freeman #240894
Curtis McLeod # 292138	Timothy Rainey #263244
Cordell Lewis # 371513	
Fareed Makeen #371165	

Executed at Broad River Correctional  
Institution, Columbia, S.C. 2/7/18

Respectfully Submitted,  
Broad River Correctional Institution  
4460 Broad River Rd  
Columbia S.C. 29210

Roger Dyke # 347604  
Broad River Correctional Institution  
4460 Broad River Rd  
Columbia S.C. 29210



Clerk's office  
UNITED STATES DISTRICT COURT  
901 Richland St.  
Columbia S.C. 29201

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THE DEPARTMENT OF CORRECTIONS HAS NOT CENSORED  
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BROAD RIVER CORRECTIONAL INSTITUTION  
S.C. DEPARTMENT OF CORRECTIONS

**LEGAL MAIL**

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2018 APR -2 PM 4: 02

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Roger Allen Dyke #347604

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-against-

Michael Stephen, Lisa Young,  
Anite Stevens, Laura H.  
Kawaguchi

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)*

Complaint for Violation of Civil  
Rights  
(Prisoner Complaint)

Case No. 6:18-0402-TMC-KFM  
(to be filled in by the Clerk's Office)

Jury Trial:  Yes  No  
(check one)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

When submitted for filing, your complaint should be accompanied by the full filing fee or an application to proceed in *forma pauperis*.

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Roger Allen Dylk  
 All other names by which you have been known:  
347604  
Broad River Correctional Inst.  
 ID Number 4460 Broad River Rd  
 Current Institution Columbia S.C. 29210  
 Address \_\_\_\_\_  
 \_\_\_\_\_

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name Michael Stapten  
 Job or Title Warden  
 (if known)  
 Shield Number South Carolina Dept. Corr.  
 Employer 4444 Broad River Rd  
 Address Columbia S.C. 29210  
 \_\_\_\_\_

Individual capacity       Official capacity

**Defendant No. 2**

Name Lisa Young

Job or Title (if known) Captain/unit manager  
Shield Number South Carolina Dept. of Corr  
Employer 4444 Broad River Rd  
Address Columbia S.C. 29210

Individual capacity       Official capacity

Defendant No. 3

Name Anite Stevens  
Job or Title (if known) Sergeant/Lieutenant  
Shield Number South Carolina Dept. of Corr  
Employer 4444 Broad River Rd  
Address Columbia S.C. 29210

Individual capacity       Official capacity

Defendant No. 4

Name Laura H. Kawaguchi  
Job or Title (if known) Assistant Director State Class  
Shield Number South Carolina Dept. of Corr  
Employer 4444 Broad River Rd  
Address Columbia S.C. 29210

Individual capacity       Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- Federal officials (a *Bivens* claim)
- State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

First, Fourth, Eighth, and Fourteenth  
Amendments.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See Entry Number #1

**III. Prisoner Status**

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- Pretrial detainee
- Civilly committed detainee
- Immigration detainee

- Convicted and sentenced state prisoner
- Convicted and sentenced federal prisoner
- Other (explain) \_\_\_\_\_

**IV. Statement of Claim**

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

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B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

*See Entry Number #1*

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C. What date and approximate time did the events giving rise to your claim(s) occur?

*See Entry Number #1*

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D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

*See Entry Number #1*

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**V. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

*See Entry Number #1*

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**VI. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

*See Entry Number #1*

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**VII. Exhaustion of Administrative Remedies Administrative Procedures**

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

- Yes
- No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Broad River Correctional Institution

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B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

- Yes
- No
- Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

- Yes
- No
- Do not know

If yes, which claim(s)?

All of them

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D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

- Yes
- No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

- Yes
- No

E. If you did file a grievance:

1. Where did you file the grievance?

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2. What did you claim in your grievance?

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3. What was the result, if any?

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4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

*I could not appeal because I was never given a grievance form to file a grievance. But, I did file Inmate Correspondence.*

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

Because Defendants Young, and  
Stevens refuse to give me any  
\_\_\_\_\_

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

I wrote Warden Staphen, and  
also had the Inmate Representative  
inform young, Stevens, and General  
Counsel.  
\_\_\_\_\_

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Inmate Representative informed all  
Defendants of all matter alleged in  
the Complaint.  
\_\_\_\_\_

*(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)*

**VIII. Previous Lawsuits**

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

- Yes
- No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

\_\_\_\_\_  
\_\_\_\_\_

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes

No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county and State)

\_\_\_\_\_

3. Docket or index number

\_\_\_\_\_

4. Name of Judge assigned to your case

\_\_\_\_\_

5. Approximate date of filing lawsuit

\_\_\_\_\_

6. Is the case still pending?

Yes

No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

\_\_\_\_\_  
\_\_\_\_\_

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

- Yes
- No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_  
 Defendant(s) \_\_\_\_\_

2. Court *(if federal court, name the district; if state court, name the county and State)*

\_\_\_\_\_  
\_\_\_\_\_

3. Docket or index number

\_\_\_\_\_

4. Name of Judge assigned to your case

\_\_\_\_\_

5. Approximate date of filing lawsuit

\_\_\_\_\_

6. Is the case still pending?

- Yes
- No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

\_\_\_\_\_  
\_\_\_\_\_

**IX. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 23, 2018.

Signature of Plaintiff Roger A. Dyke  
Printed Name of Plaintiff Roger A. Dyke  
Prison Identification # 347604  
Prison Address 4460 Broad River Rd  
Columbia S.C. 29210  
City State Zip Code

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_  
Printed Name of Attorney \_\_\_\_\_  
Bar Number \_\_\_\_\_  
Name of Law Firm \_\_\_\_\_

Address

Telephone Number

E-mail Address

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Roger Allen Dylk #347604  
Broad River Correctional Inst.  
4460 Broad River Rd S108A  
Columbia S.C. 29210

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Office of the Clerk  
United States District Court  
300 East Washington Street  
Room 239  
Greenville, S.C. 29601

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S.C. DEPARTMENT OF CORRECTIONS