

**COURT OF APPEALS OF GEORGIA
DOCUMENT RETURN NOTICE FOR APPLICATIONS**

May 13, 2015

To: Mr. Meddric M. Glover, GDC15427, Crisp County Jail, 196 Highway 300 South, Cordele, Georgia 31015

Docket Number: **Style:** **Meddric M. Glover v. The State**

Your document(s) is (are) being returned for the following reason(s).

1. ☒ **Your Application was not accompanied by the statutory filing fee, \$300.00 civil; \$80.00 criminal, or a sufficient pauper's affidavit. OCGA§5-6-4 and Rule 5 Please be advised that your pauper's affidavit should be notarized by a notary public.**
2. ☐ Portions of the record included were not tabbed and indexed. Rules 30 (e) and 31 (c).
3. ☒ **A stamped "filed" copy of the trial court's order to be appealed was not attached to your Application. Rules 30 (b) and 31 (e)**
4. ☒ **A stamped "filed" copy of the Certificate of Immediate Review was not attached to your Interlocutory Application. Rule 30(b)**
5. ☐ Your document(s) was (were) not signed by counsel (No signatures with expressed permission are permitted). Rule 1 (a)
6. ☐ There were an insufficient number of copies of your document. Rule 6
7. ☐ No Certificate of Service accompanied your document(s). Rule 6 You should provide a copy of your filing to the District Attorney and include his/her name and address on your Certificate of Service.
8. ☐ Your Certificate of Service did not include the complete name and /or mailing address of each opposing counsel and pro se party. Rule 1(a) and 6
9. ☐ Your document exceeds page limits. Rules 24(f) , 30(e) and 31(c)
10. ☐ Your request for court action must be submitted in motion form. Rule 41 (a)
11. ☐ No extension of time for filing an interlocutory application will be granted . Rule 30 (g) . No extension of time will be granted for filing a discretionary application unless the motion for extension is filed on or before the due date of the discretionary application.
12. ☐ The type font was smaller than 10 characters per inch; type was not double-spaced or/and type was on both sides of the paper. Rules 1(c), 24(b), 37(a) and 41(b).
13. ☐ Your motions were submitted in an improper form (joint, compound, or alternative motions in one document). Rule 41 (b)
14. ☐ Margins were too small or paper size was incorrect. Rules 1(c), 24(c), 30(e), 31(c) and 41(b).
15. ☐ Your document was submitted for filing more than 30 days after the date of the order granting, denying or dismissing the application or the order granting, denying or dismissing the Motion for Reconsideration. Rules 30(j) and 31(j).
16. ☐ **Other:**

For Additional information, please go to the Court's website at: www.gaappeals.us

In The Superior Court Of Crisp County

State Of Georgia

FILED IN OFFICE

MAY 8 - 2015

Jean H. Rogers, Clerk
CRISP SUPERIOR COURT

State Of Georgia

- VS -

Meddric M. Glover

Case No. 18R-151;
09R-309; 12R-417

Certificate Of Immediate
Review

Come Now Meddric M. Glover, defendant, In the above styled "Certificate Of Immediate Review" As Authorized under D.C. G. A. 5-7-2, 5-6-35, 5-6-34 (B) And Cited in "Suruggs - vs - Georgia Department Of Human Resources, 261 GA 587, 403 S. E. 2d 103 (1990) And Due Process Of law Rights And Procedural Guarantee. Defendant Submits This Motion In ProPria Persona And In FORMA PAUPERIS TO WIT;

A.

On 9-2-2014, Defendant turn himself In To Crisp County Sheriff's Office for Murder.

On 9-3-2014, Probation Officer Placed A hold Against the Defendant.

On September 23RD-2014, A Petition To Revoke Defendant Probation was issued By the Probation Officer...

In The Superior Court of Crisp County
State of Georgia

FILED IN OFFICE

MAY 8 - 2015

Jean H. Rogers, Clerk
CRISP SUPERIOR COURT

State of Georgia
-vs-
Meddric M. Glover

CASE NO. DBR-151
CRK-309; 12R-414

Notice of Intent

Comes Now Meddric M. Glover, Defendant
in the above styled "Notice of Intent,"
To Apply Interlocutory Application To the
Court of Appeals of Georgia.

This 15 Day of April, 2015

Meddric M. Glover
Meddric M. Glover
Crisp County Law
Enforcement 196
Hwy. 300 South
Gordale, GA. 31015

On October-9-2014, SUPERIOR COURT Judge
Sign the Petition to REVOKE DEFENDANT
PROBATION AND ORDERED DEFENDANT TO APPEAR
IN COURT 21st day of OCTOBER, 2014 at
9:00 A.M.

DEFENDANT moves this COURT TO Imme-
diately REVIEW THE BELOW AND FOREGOING
FACTS OF LAW TO RELIEVE DEFENDANT
OF THIS CLEAR PREJUDICE AND UNCONSTITUTIONAL
PROCESS WHICH IS CURRENTLY UNDER SCRUTINY
OF FALSE IMPRISONMENT VIOLATION AGAINST THE
RIGHTS GUARANTEED THE DEFENDANT UNDER
THE 14th AMENDMENT AND TO INCLUDE THE
CRUEL AND UNUSUAL PUNISHMENT TO THE 8th
AMENDMENT, TO THE UNITED STATE
CONSTITUTION.

B.

DEFENDANT ARGUES THAT THE PROBATION
REVOCATION HEARING WAS A DUE PROCESS
VIOLATION BASED ON THE FACT THAT THE
PROBATION OFFICER FAILED TO SCHEDULE
A TIMELY PROBATION REVOCATION HEARING.
A PROBATIONER IS ENTITLED TO DUE PROCESS
IN ALL PROBATION REVOCATION PROCEEDING
SUPERIOR COURT. JUDGE CONTINUED
DEFENDANT PROBATION REVOCATION HEARING
FROM - OCTOBER-21-2014 UNTIL APRIL-15-
2015.

On April-14-2015, Defendant will Be INCARCERATED 7-months in Crisp County Jail Facility without A Probation Revocation Hearing...

The Probation Guideline Requires that Petition Be Filed within 15 Days of Arrest SEE COURT CASES;

- ANDERSON-VS-STATE, 166 GA APP 521 304 S. E. 2d 747 (1983)
- PORTER-VS-STATE, 142 GA APP. 481 (1) 236 S. E. 2d 172 (1977)
- McCoy-VS-STATE, 246 GA APP 623 (2000)

C.

The GEORGIA Statute Provides Only that IF the PROBATIONER is NOT RELEASED when He is brought BEFORE the Court the First time He shall be given An Opportunity to be HEARD Fully At the EARLIEST POSSIBLE date on his own BEHALF, IN PERSON OR by COUNSEL... The GEORGIA Court OF APPEALS Has INTERPRETED that Statute to mean that in the Absence of "SPECIAL CIRCUMSTANCES" 30dys is An ENTIRELY REASONABLE time PERIOD between Petition And Hearing...

D.

SEE COURT CASE; CAVIDWELL-VS-STATE ALL
GA APP 417 (1993) REVOCATION OF PROBATION
IS AN ACTION OF THE COURT. THE GENERAL
ASSEMBLY HAS DETERMINED THAT TAKING
A (PROBATIONER) PERSON INTO CUSTODY
WITHIN THE MEANING OF O.C.G.A. 42-8-36
IS ONE WAY OF MAKING THAT PERSON
AVAILABLE TO THE COURT FOR PENDING
REVOCATION PROCEEDING...

E.

DEFENDANT ARGUES THAT HIS INCARCERATION
IN CRISP COUNTY MADE HIM AVAILABLE TO
THE COURT "PROBATION REVOCATION HEARING,
IN CRISP COUNTY MONTHS PRIOR, BASED
ON THE FACT THAT THE PROBATION OFFICER
AND DISTRICT ATTORNEY OFFICE CORDELE
JUDICIAL CIRCUIT WAS CONTACTED AND
INFORMED THEM OF DEFENDANT
INCARCERATION, THE ACTION THAT WAS
TAKING BY THE SUPERIOR COURT JUDGE,
THE DISTRICT ATTORNEY OFFICE AND
THE PROBATION OFFICER OF CORDELE
JUDICIAL CIRCUIT SHOULD HAVE BEEN THE
SAME ACTION TAKING MONTHS PRIOR TO
DEFENDANT ARREST; BY NOT DOING SO
CAUSED DEFENDANT TO REMAIN INCARCERATED
WITH OUT BEING INDICTED, WITH A
PROBATION HOLD AND WITHOUT BOND AS STAND.
DEFENDANT WENT TO PROBATION REVOCATION
HEARING ON APRIL-15-2015.

F.

On September-18-2014, Defendant was Denied Bond By the honorable T. Christopher Hughes, Superior Court Judge For A Probation Hold In Crisp County For A Pending Charge Of Murder Against the Defendant Is Prejudicing And In Violating Of Defendant Due Process Of Law Also Is Cruel And Unusual Punishment And Violate Fundamental Fairness "Fourteenth Amendment U.S. Const. Amend...

Under Color Of Law, No man Shall Be Restrained Or Imprisoned Under False Imprisonment

G.

Defendant Argues that Public Defender, David Morgan Didn't Present Defendant Eye Witness At Probation Revocation Hearing And Didn't Present Defendant Pay Fines On His Probation When He Was Working And Able To Pay, And Public Defender David Morgan Didn't Argue On Prosute Use On Cases that Wasn't Similar to The Defendant Case And there Was Insufficient Counsel.

See Odum-vs-State, 312 GA APP 403 718 S.E. 2d 339 (2001) A Court May Not Revoke Any Part Of Any Probated

OR SUSPENDED SENTENCE UNLESS THE EVIDENCE PRODUCED AT THE REVOCATION HEARING ESTABLISHES BY A PREPONDERANCE OF THE EVIDENCE THE VIOLATION OR VIOLATION ALLEGED.

H.

SERVICE OF PROBATION DOES NOT MEAN THAT THE DEFENDANT LIBERTY SHOULD BE SUBJECT TO PREJUDICE OR BIAS OR A MALICE PROSECUTION OR BE SUBJECT TO THE WHIM OR FANCY OF THE PROBATION OFFICER OR TRIAL JUDGE SEE COURT CASE, LOMBARDO -VS- STATE 244 GA APP 885 537 S.E. 2d 143 (2000)

FOR ALL THE ABOVE AND FOREGOING REASONS AND STATED FACTS AND TO SAVOR A MISCARRAGE OF JUSTICE AND RELIEF FROM CLEAR PREJUDICE DEFENDANT PRAYS THIS COURT NOT REVOKE DEFENDANT PROBATION...

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT I HAVE
SERVED ALL LISTED PARTIES BY
DEPOSITING A COPY OF THE SAME
IN U.S. MAIL WITH ADEQUATE
POSTAGE ATTACHED AND PROPERLY
ADDRESSED TO ASSURE DELIVERY
UPON,

MRS. JEAN ROGERS, CLERK
CRISP SUPERIOR COURT
P.O. BOX 747
CORDELE, GA 31010-0747

DENISE D. FACHINI
DISTRICT ATTORNEY
CORDELE JUDICIAL CIRCUIT
CORDELE, GEORGIA
31010-5510

DATED: THIS 15 DAY
OF April, 2015

Meddric M. Glover
MEDDRIC M. GLOVER
CRISP CO. JAIL #15427

