

ROVD - USDC - CHAS, SC
2025 DEC 23 AM 8:56

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

KEVIN JOHNSON, Plaintiff,
v. Case No.: 2:25-cv-12580-BHH-MGB
CHADWICK DOTSON, et al., Defendants.

DECLARATION

KEVIN JOHNSON, under oath states as follows:

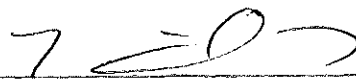
1. I am the pro se plaintiff in this case and base this statement on personal knowledge.
2. Rachel Cobb is a South Carolina Department of Corrections (SCDC) corrections officer of the lowest rank, who works at Perry Correctional Institution (PCI) as the law library supervisor.
3. Under SCDC policy GA-01.03 ("Inmate Access to the Courts"), Cobb, as a security officer and not a law librarian, is not qualified, trained nor supposed to serve in the position of an SCDC law library supervisor. Under this policy, SCDC law libraries are supposed to be staffed by a trained law librarian who in turn is required to train inmate law clerks to perform legal research with the assistance of SCDC General Counsel. Defendant Anderson and SCDC General Counsel do not abide by these policy requirements at PCI nor elsewhere in the SCDC that I know of.
4. My experience with Cobb is that she has been allowed to run the PCI law library in order to interfere with, frustrate and sabotage the ability of those confined at PCI to pursue litigations against her SCDC colleagues. Under SCDC policy GA-01.03 law libraries are supposed to be open 37.5 hours per week, to include 6 hours at night time. Cobb only opens the PCI law library no more than eighteen (18) hours per week and never at night. Those with court deadlines are supposed to be given priority access to the law library even during emergency lockdowns under GA-01.03. This does not occur under Cobb, who doesn't know how to determine deadlines set by court rules nor does she know how to conduct legal research.
5. If Cobb did not have control over the PCI law library she would not have control over the photocopier in the library to deny my ability to obtain copies, which I am willing

Exhibit B

and ~~not~~ able to pay for, of self-generated legal documents. She has and continues to obstruct my ability to meet court deadlines in my pending cases by denying my access to the law library, not operating it the number of hours required by policy, and this while I am denied use of the electronic tablets that all others confined in scope may have, which tablets have a Westlaw legal research app on them.

6. Cobb is allowed to run the law library in the aforesaid manners by General Counsel and defendant Anderson who I have directed numerous requests and complaints to about her obstructions, but which they refuse to address, correct or resolve.

I swear to the truth of the foregoing under penalty of perjury.



Signature