

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

<p>Twanda Marshinda Brown, <i>et al.</i>,</p> <p>Plaintiffs,</p> <p>v.</p> <p>Lexington County, South Carolina, <i>et al.</i>,</p> <p>Defendants.</p>	<p>Civil Action No. 3:17-cv-01426-MBS-SVH</p>
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**DECLARATION OF NORA ANN CORDER
IN SUPPORT OF PLAINTIFFS’ OPPOSITION TO DEFENDANTS’
MOTION FOR SUMMARY JUDGMENT ON DAMAGES CLAIMS**

I, Nora Ann Corder, declare as follows:

1. I am indigent.
2. I need a car and the ability to drive in order to be able work and find jobs.
3. In 2016, I was unemployed for a significant period of time. As a result, I was indigent and suffered financial hardship. I was eligible for and received needs-based assistance, including food stamps through SNAP.
4. I was unable to afford my car insurance policy while I was unemployed and it was canceled as a result. In July 2016, I was ticketed for not having car insurance, which led to a \$230 fine and a suspension of my driver’s license.
5. I could not reinstate my driver’s license because I could not afford to pay the \$230 fine, the \$100 driver’s license reinstatement fee, or the cost of car insurance.
6. Later that year, I began working at a shipping warehouse that was located eighteen miles from my home. Because I worked twelve-hour shifts that ended very early in the

morning, I could not find anyone to drive me from my home to work, and there was no public transportation to get there. So, I had to drive myself to work.

7. In January 2017, I was stopped by a Lexington County Sheriff's Deputy and received three traffic tickets: one for driving under a suspended license ("DUS-1"); one for a temporary license plate violation; and one for driving without car insurance. The tickets informed me that I had to appear in court and provided the address of the Lexington Magistrate Court.

8. During the traffic stop, my car was also impounded.

9. I lost my job in February 2017 because I could not afford to get my car out of impound and had no other way to travel to work.

10. In March 2017, I started a new job at a Waffle House. I worked full time, but earned only \$290 per week. I also had to pay neighbors and other acquaintances \$10 to \$15 each workday to drive me to and from the Waffle House, which reduced the amount of money I had to pay for basic necessities.

11. From March to May 2017, I was indigent and received needs-based public assistance in the form of SNAP food assistance.

12. I went to the Lexington Magistrate Court for scheduled court hearings on my traffic tickets on three different occasions: February 15, 2017; March 22, 2017; and April 19, 2017. Each time I appeared in court, the officer who ticketed me requested that the case be continued to a later date. The officer told me he would drop the car insurance and driver's license charges if I obtained car insurance and paid to have my driver's license reinstated. On each of these dates, however, I told the officer I could not afford to get my car out of impound or pay the driver's license reinstatement fees.

13. When I went to court on April 19, 2017, the officer who ticketed me told me he was going to continue the case to May 17, 2017.

14. The Lexington Magistrate Court was located too far away from my rural home to walk and I could not find transportation from my home to court on May 17, 2017. There was also no public transportation in the area where I lived. As a result, I missed my court hearing on that date.

15. No one from the Lexington Magistrate Court contacted me about my hearing.

16. A few days later, I called the Lexington County Sheriff's Department. I was informed that there was a bench warrant for my arrest.

17. I called the Lexington Magistrate Court to explain that I had been unable to secure transportation to court on May 17, 2017. A clerk informed me that I was required to pay \$1,320 or to turn myself in for arrest. I explained that I had only recently secured a job and could not afford to pay the full amount, but I could pay in installments. The clerk told me I was not allowed to pay in installments, and that I would be arrested unless I paid \$1,320 in full.

18. During the same time that I learned there was a bench warrant for my arrest, I was also facing eviction from my home because I could not afford my rent.

19. On May 26, 2017, I went to the Lexington Magistrate Court to file forms to fight the eviction action against me. Shortly after I arrived in the courthouse, I was handcuffed, arrested, and taken to the Lexington County Detention Center.

20. I could not afford to pay \$1,320, so I was incarcerated for 54 days.

21. I lost my home because I could not fight the eviction action while I was in jail. I also lost my job because I could not report to work while I was in jail.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed in Lexington, South

Carolina on the 22 day of November, 2017.

By Nora Ann Corder
Nora Ann Corder