

THOMAS DAVID DEEGAN
PLAINTIFF

AMENDED COMPLAINT

OCT - 8 2015

Vs.

Memorandum of Law

STATE OF WEST VIRGINIA ETAL
DEFENDANT

In Support of Federal Writ of Habeas Corpus

Submitted Under Title 28 USC, Part VI, CHAPTER 153, §§ 2241 - 2256

[FRCP RULE 81]

TERESA L. DEPPNER, CLERK
U.S. District Court
Southern District of West Virginia

CASE # 2:15-CV-13638

VERIFIED WRIT OF HABEAS CORPUS

COMES NOW THE PETITIONER Thomas David Deegan

Who is unschooled in law and speaks only in guttural vernacular to apply his right to the

Writ of Habeas Corpus to inquire as to the Nature and Cause of His detention

in NORTH CENTRAL REGIONAL JAIL

1. No meaningful hearing before a Court of Record has occurred prior to incarceration.
2. No explanation of the Nature of the Action has been explained to petitioner prior to incarceration.
3. No explanation of the Cause of Action has been explained to petitioner prior to incarceration.
4. No assistance of Counsel was afforded petitioner.
5. Subject Matter Jurisdiction was not established prior to incarceration.
6. This petitioner demands immediate implementation of this Writ.
7. All findings of fact and conclusions of law regarding the Writ shall be in writing.

Respectfully Submitted,

Date 10/08/2015

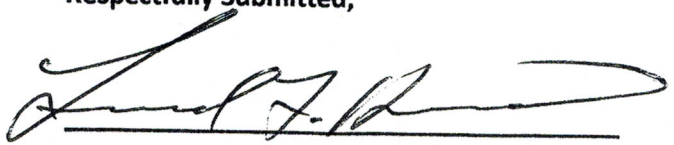

Leonard Frank Harview

EXHIBIT "G"

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

THOMAS DAVID DEEGAN

Plaintiff,

CERTIFICATE OF SERVICE

v.

STATE OF WEST VIRGINIA ET AL

CIVIL ACTION 2:12-CV-13638

Defendant.

I hereby certify that on 10/08/2105, I presented the foregoing document to the Clerk of Courts for filing and uploading to the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Kevin Williams
(West Virginia State Trooper)
143 Academy Dr.
Dunbar, WV 25064

Magistrate Robin ~~Williams~~ **WATERS**
Wood County Justice Center
401 Second Street, Suite 12
Parkersburg, WV 26101

THE HONORABLE:
JOHN T. COPENHAVER, JR.
300 VIRGINIA ST. EAST, ROOM 6009
CHARLESTON, WV
25301