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STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

JUN 13 2013

APPEAL FROM ABBEVILLE COUNTY  
HONORABLE ROGER COUCH, JUDGE

S.C. SUPREME COURT

CASE NO: 2010-CP-01-00175

ALTI MONTE HASKELL,

RESPONDENT,

v.

STATE OF SOUTH CAROLINA,

PETITIONER.

PETITION FOR APPEAL BOND

THIS MATTER COMES BEFORE THE SUPREME COURT BY MOTION OF PRO SE, FOR RESPONDENT, WHO MOVES THE COURT TO ADMIT ALTI HASKELL BAIL PENDING THE OUTCOME OF THE STATE'S APPEAL OF HIS GRANT OF POST-CONVICTION RELIEF (SCRCP RULE 230(a)).

IN SUPPORT OF THIS MOTION RESPONDENT WILL SHOW UNTO THE COURT:

1) RESPONDENT'S CONVICTION AND SENTENCE WAS VACATED UPON HIS APPLICATION FOR POST-CONVICTION RELIEF BY THE HONORABLE T. RUSSO JUDGE, BY ORDER DATED APRIL 26, 2013. (COPY ATTACHED).

2) THE STATE OF SOUTH CAROLINA HAS APPEALED THIS ORDER TO THE SUPREME COURT BY NOTICE OF APPEAL ON JUNE 3, 2013.

3) RESPONDENT BELIEVES AND HEREBY CONTENTS THAT A POST-CONVICTION RELIEF APPLICANT MAY BE ADMITTED TO BAIL

UPON SERVICE OF THE NOTICE OF APPEAL. AS RESPONDENT'S SENTENCE EXCEEDS IMPRISONMENT FOR TEN (10) YEARS, THE PETITION FOR BAIL MUST BE MADE TO THE SUPREME COURT.

4) IN EXERCISING ITS DISCRETIONARY AUTHORITY TO ADMIT AN APPLICANT TO BAIL THE COURT MAY CONSIDER THE FOLLOWING FACTORS:

A) THE PROBABILITY THE APPLICANT WILL PREVAIL UPON THE REVIEW OF THE SUPREME COURT AND IF HE PREVAILS THE NATURE OF RELIEF HE WILL RECEIVE.

THE ORDER OF THE CIRCUIT COURT, ATTACHED, CLEARLY REFLECTS THAT THE POST-CONVICTION RELIEF WAS GRANTED ON SEVERAL SUBSTANTIVE GROUNDS ANY ONE OF WHICH IS SUFFICIENT TO GRANT POST-CONVICTION RELIEF IN WHICH HAS BEEN ORDERED.

RESPONDENT WOULD SUBMIT TO THE HONORABLE COURT THAT HIS CHANCES OF PREVAILING ON APPEAL ARE STRONG.

B) THE SERIOUSNESS OF THE CRIMINAL OFFENSE COMMITTED.

C) THE DANGER THE RESPONDENT MAY POSE TO THE COMMUNITY IF HE IS RELEASED.

RESPONDENT DOES NOT HAVE A RECORD OF VIOLENCE AND STANDS BEFORE THIS COURT CLOTHED WITH A PRESUMPTION OF INNOCENCE AND DOES NOT POSE A DANGER TO THE COMMUNITY IF RELEASED.

PRIOR TO CONVICTION RESPONDENT LIVED WITH HIS DAUGHTER AND FIANCEE IN ABBEVILLE. RESPONDENT WAS EMPLOYED AT BURSTEIN VON SELEEN. RESPONDENT CONTENDS THAT HE IS NOT A

FLIGHT RISK. RESPONDENT WAS NOTIFIED THAT THERE WAS OUTSTANDING WARRANT(S) PENDING IN WHICH RESPONDENT NOTIFIED AUTHORITIES IN ATTEMPTS TO RESOLVE THIS MATTER. IN DOING SO, RESPONDENT WENT TO THE POLICE DEPARTMENT IN ABBEVILLE TO TURN HIMSELF IN WITH HOPES OF CLEARING HIMSELF OF THE ALLEGED ALLEGATIONS. RESPONDENT WAS SET A TWENTY-FIVE THOUSAND DOLLAR BOND (\$25,000.00). RESPONDENT WAS RELEASED UPON MAKING BOND AND ATTENDED EACH GENERAL SESSIONS ROLL-CALL UNTIL HIS CONVICTION.

APPLICANT PRAY THE HONORABLE COURT GRANTS HIM BOND TO BE BACK WITH HIS FAMILY AND TO BE ABLE TO WORK AND HELP THEM FINANCIALLY.

Aiti MONTÉ Haskell  
PCI / Q4B-210  
430 Oaklawn Rd.  
Pelzer, SC 29669

PROOF OF SERVICE OF A NOTICE PETITIONING  
THE COURT FOR APPEAL BOND

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
(IN THE SUPREME COURT)

RECEIVED

APPEAL FROM ABBEVILLE COUNTY  
Court of Common PLEAS

JUN 19 2013

Thomas Russo, Circuit Court Judge S.C. SUPREME COURT

CASE NO: 2010-CP-01-00175

Rutledge Johnson of the South Carolina Attorney's General's office  
Petitioner

ALTI MONTÈ Haskell

Respondent

PROOF OF SERVICE

I CERTIFY that I have served the notice Requesting by motion an appeal Bond. by depositing a copy of it in the United States Mail here at Perry Correctional Institution on June 13, 2013, addressed to Rutledge Johnson, Post-Office Box 11549, Columbia, SC 29211.

Alti Montè Haskell  
Alti Montè Haske 11<sup>#185392</sup>  
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