

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Apr 11 2023

SC Court of Appeals

Appeal from Charleston County  
Court of General Sessions

The Honorable Bentley Price, Circuit Court Judge

Indictment No. 2018-GS-10-06307; 2018-GS-10-04451; 2018-GS-10-04448;  
2018-GS-10-04450; and 2018-GS-10-06313

THE STATE OF SOUTH CAROLINA,

Appellant,

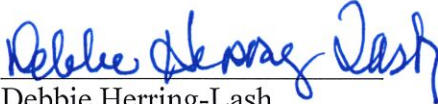
v.

JUAN MANUEL RAMIREZ-SANDOVAL,

Defendant-Respondent.

NOTICE OF APPEAL

The State of South Carolina appeals the April 7, 2023, **Order on Defense Motion for Speedy Trial and for Dismissal** by the Honorable Bentley Price, filed April 10, 2023, in the above-captioned case and the ruling(s) upon which such was based.



Debbie Herring-Lash  
Assistant Solicitor  
101 Meeting Street, Suite 400  
Charleston, South Carolina 29401  
(843) 958-1900  
ATTORNEY FOR APPELLANT

April 11, 2023

Other Counsel of Record:

Karla Martinez Lainez, Assistant Public Defender  
Charleston County Public Defender's Office  
101 Meeting Street, Suite 500  
Charleston, South Carolina 29401  
(843) 958-1850

## Timeline History for State v. Juan M. Ramirez-Sandoval

Arrest March 22, 2018

Trial week of 2-10-2020 Mistrial jury unable to reach a unanimous decision.

COVID shuts trial court down from March 2020 to August 2021

10-8-2020 plea offer made on lesser charge.

8-9-2021 on trial docket continued due to attorney availability with consent of both parties.

8-18-2021 attorney Tola Familoni (PD) files Motion to be Relived for Mr. Sandoval.

9-7-2021 this Motion to be Relived was denied.

9-13-2021 on trial docket continued due to defense attorney not available.

1-3-2022 on trial docket continued by court due to not having two available interpreters.

2-28-2022 defendant scheduled for accept/reject before the Court, however defendant has plea offer to expire on April 8, 2022.

5-9-2022 on trial docket continued by court due to not having two interpreters available and new defense attorney had taken over the defense case.

7-14-2022 Defense writes letter to Admin Judge seeking guidance about there not being interpreters for the August 29, 2022, trial.

7-20-2022 Status Conference held with Administrative Judge. Defense verbally seeks guidance about there not being interpreters for the August 29, 2022 trial. No guidance provided.

7-21-2022 Defense files Motion for Speedy Trial.

8-29-2022 case to be on docket. On June 22nd clerk has two interpreters but on same day one of the interpreters backs out. On July 9<sup>th</sup> clerk informs parties he has reached out to every interpreter in the state, and we do not have two for trial on August 29, 2022.

8-29-2022 on trial docket continued by court due not having two interpreters available. The court tells the clerk to reach out to interpreters to find a week they can be available before putting case on a trial docket.

1-31-2023 Motion for Speedy Trial heard case is on March 6<sup>th</sup> trail docket, so court does not make a ruling.

3-3-2023 a status conference on case. Clerk has only found one interpreter for March 6, 2023, week. The court at that time felt there was no alternative, but dismissal ask for an order to be prepared.

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State of South Carolina



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**SCARLETT A. WILSON**

*Solicitor, Ninth Judicial Circuit*

April 11, 2023

The Honorable Jenny Abbott Kitchings  
Clerk of South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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Re: The State v. Juan Manuel Ramirez-Sandoval

Dear Ms. Kitchings:

Enclosed please find a Notice of Appeal in the above-referenced case. I have also enclosed a copy of the trial court's order in this matter from which the State is appealing. By copy of this letter a copy of the Notice is being provided to all parties.

Please contact me if you have any questions or need any further information. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Debbie Herring-Lash".

Debbie Herring-Lash  
Assistant Solicitor

Enclosures

cc: Karla Martinez Lainez, Assistant Public Defender  
The Honorable Julie J. Armstrong, Charleston County Clerk of Court