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July 12, 2013

RECEIVED

JUL 15 2013

Via US Mail

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

SC Court of Appeals

Re: Appeal Related to *State of South Carolina v. Joe Ross Worley*
Appellate Case No. 2012-210646

Dear Ms. Kitchings:

I am in receipt of your letter dated July 08, 2013. I understood the court's order of March 28, 2013, to require Respondent's counsel to provide status reports to the Court, and apologize if there was an expectation prior to your referenced letter that we would be doing the same. We are certainly happy to do so in any event.

Judge Keesley held a hearing on the order of remand (to reconstruct testimony) on June 14, 2013. Additional materials were submitted by the Clerk of Court and lawyers for the State (contemporaneous notes from the hearing), and Judge Keesley is now considering the matter.

In the interim, we have filed a motion for reconsideration of bond with the circuit court, and a Motion for Limited Remand with this Court to permit the circuit court to consider granting pre-trial bond to Mr. Worley in light of the changed circumstances which the unfortunate delays have created. We have not yet received a response from The State to our Motion for Limited Remand.

We believe the limited remand to Judge Keesley for reconstruction of the record and the partial remand for the trial court (the case is now assigned to Judge Addy) to consider bond are independent of one another and therefore can, and should, be considered separately.

Yesterday, I emailed Judge Keesley to inquire if he needs anything further from Mr. Worley's team of attorneys to conclude his consideration of the remand.

Honorable Jenny Abbott Kitchings
In re: State v. Worley
July 12, 2013

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I will provide you with another update within 30 days, or when we hear from Judge Keesley, whichever is sooner.

Thanks for your letter. With warm personal regards, I am,

Sincerely yours,



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cc: Mark R. Farthing, Esquire
Carson Henderson, Esquire (via email only)
Billy Garrett, Esquire (via email only)
Mary Worley