

# EDWARD M. BROWN

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ATTORNEY AT LAW  
146 SPRING STREET ~ CHARLESTON, SC 29403  
OFFICE: (843) 577-7363 ~ FACSIMILE: (843) 577-3079

EDWARD M. BROWN

September 16, 2013

PLEASE REPLY TO:  
P. O. BOX 20261  
CHARLESTON, SC 29413-0261  
E-Mail: edbrownlawfirm@att.net

**Attention: V. Claire Allen, Deputy Clerk**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

**RE: The State**  
**vs.**  
**Lavard Lind-Baez**  
**Indictment No. 2012-GS-26-02928**  
**Appellate Case No. 2013-001614**

Dear Madam Clerk:

I'm in receipt of your letter dated September 12, 2013 relative to the above-referenced matter.

In that connection, you will find enclosed herein, a copy of a letter that I sent to the Appellant, Lavard Lind-Baez on September 9, 2013 explaining to him that he needs to file in writing with the S.C. Court of Appeals within twenty (20) days; an explanation of any arguable issues which can be reviewed on appeal.

Additionally, you will note the enclosure of a Proof of Service relative to this matter.

Yours very truly,

  
Edward M. Brown

EMB/dr

Enclosures

RECEIVED  
SEP 20 2013  
SC COURT OF APPEALS

cc: Robert Michael Dudek, Esquire  
S.C. Commission on Indigent Defense  
1330 Lady Street, Suite 401  
Columbia, SC 29201

Salley W. Elliott  
Senior Assistant Deputy Attorney General  
P. O. Box 11549  
Columbia, SC 29211-1549

J. Gregory Hembree, Esquire  
Solicitor  
Fifteenth Judicial Circuit  
P.O. Box 1276  
Conway, SC 29528  
Attorney for Respondent

Melanie Huggins-Ward  
Clerk of Court  
Fifteenth Judicial Circuit  
1301 Second Avenue  
Conway, SC 29526

Appellant  
Lavard Lind-Baez  
SCDC #322170  
Kirkland Reception & Evaluation Institution  
4344 Broad River Road  
Columbia, SC 29210

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ATTORNEY AT LAW  
146 SPRING STREET - CHARLESTON, SC 29403  
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EDWARD M. BROWN

September 9, 2013

PLEASE REPLY TO:  
P. O. BOX 20261  
CHARLESTON, SC 29413-0261  
E-Mail: edbrownlawfirm@att.net

Lavard Lind-Baez  
SCDC #322170  
Kirkland Reception & Evaluation Institution  
4344 Broad River Road  
Columbia, SC 29210

**RE: The State**  
**vs.**  
**Lavard Lind-Baez**  
**Indictment No. 2012-GS-26-02928**  
**Appellate Case No. 2013-001614**

Dear Lavard:

You will find enclosed herein, a letter that I forwarded to the South Carolina Court of Appeals. Be advised that you have twenty (20) days from the date of this letter in which to send to the Court of Appeals, pursuant to Rule 203(d)(1)(B)(iv) of the South Carolina Appellate Court Rules, "*a written explanation showing that there is an issue which can be reviewed on appeal. This explanation should identify the issue(s) to be raised on appeal and a factual basis for the issue(s) including how the issue(s) was raised below and the ruling of the lower court on the issue(s). If an issue was not raised to and ruled on by the lower court, the explanation shall include argument and citation to legal authority showing how this issue can be reviewed on appeal.*"

Additionally, you will find enclosed herein, a Notice of Motion and Motion to be Relieved as Counsel of Record for appellate purposes in this matter.

Yours very truly,

  
Edward M. Brown

RECEIVED

SEP 20 2013

SC Court of Appeals

EMB/dr

Enclosure

cc: Clerk  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

Salley W. Elliott  
Senior Assistant Deputy Attorney General  
P. O. Box 11549  
Columbia, SC 29211-1549

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(843) 915-5460  
(843) 915-6461 (fax)  
Attorney for Respondent

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Fifteenth Judicial Circuit  
1301 Second Avenue  
Conway, SC 29526  
(843) 915-5080

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of General Sessions

Larry B. Hyman, Jr., Circuit Court Judge

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Indictment No. 2012-GS-26-02928

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The State .....Respondent

v.

Lavard Lind-Baez..... Appellant

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**PROOF OF SERVICE**

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I certify that I have served my September 9, 2013 letter on the Appellant and Respondents by depositing a copy of it in the United States Mail, postage prepaid, on September 16, 2013 addressed to the following parties:

Robert Michael Dudek, Esquire  
S.C. Commission on Indigent Defense  
1330 Lady Street, Suite 401  
Columbia, SC 29201

Salley W. Elliott  
Senior Assistant Deputy Attorney General  
P. O. Box 11549  
Columbia, SC 29211-1549

J. Gregory Hembree, Esquire  
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Conway, SC 29528  
Attorney for Respondent

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Melanie Huggins-Ward  
Clerk of Court  
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Conway, SC 29526

Appellant

Lavard Lind-Baez  
SCDC #322170  
Kirkland Reception & Evaluation Institution  
4344 Broad River Road  
Columbia, SC 29210

September 16, 2013



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Attorney for Appellant

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CHARLESTON, SC 29413-0261



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The Honorable Jenny Abbott Kitchings  
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SEP 20 2013

**SC Court of Appeals**

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