

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )  
 )  
 )  
State of South Carolina )  
 )  
Respondent, )  
 )  
v. )  
 )  
Kenneth Jordan Bell )  
 )  
Defendant. )  
\_\_\_\_\_ )

IN THE COURT OF APPEALS

Case No: Case No. 2013-GS-26-01335  
Case No. 2013-GS-26-01336  
Case No. 2013-GS-26-01337  
Case No. 2013-GS-26-01339  
Case No. 2013-GS-26-01340

**FIRST MOTION FOR EXTENSION  
OF TIME TO ORDER TRANSCRIPT**

**COMES NOW** the Defendant, Kenneth Jordan Bell, by and through his undersigned attorney, respectfully moves this Honorable Court to grant this First Motion for Extension of Time to Order Transcript in support of states as follows:

1. The time to order the transcript is due September 20, 2013.
2. Undersigned counsel is requesting a thirty (30) day extension due to the defendant's inability to forward the Affidavit of Indigency to South Carolina Commission on Indigent Defense.
3. This motion is made in good faith and not for the purposes of unnecessary delay.
4. Opposing counsel does not have an objection to this first extension of time.

**WHEREFORE**, Appellant moves for an order granting a thirty (30) day time period to file the initial brief and designation of matter, making it due on October 20, 2013.

Respectfully Submitted,



M. Gregory McCollum  
Attorney at Law  
516 29<sup>th</sup> Avenue N.  
Myrtle Beach, SC 29577  
(843) 626-5480

September 17, 2013

STATE OF SOUTH CAROLINA )  
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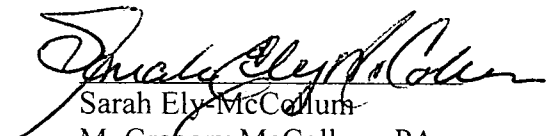
IN THE COURT OF APPEALS  
Case No: Case No. 2013-GS-26-01335  
Case No. 2013-GS-26-01336  
Case No. 2013-GS-26-01337  
Case No. 2013-GS-26-01339  
Case No. 2013-GS-26-01340

**CERTIFICATE OF SERVICE**

I, Sarah Ely-McCollum, an employee of M. Gregory McCollum, counsel for the Appellant in the above-entitled action, certify that on September 18, 2013 I mailed by U.S. Mail properly addressed:

The Honorable Salley Elliot,  
Assistant Deputy Attorney General  
State of South Carolina  
Rembert Dennis Building  
1000 Assembly Street, Room 519  
Columbia, S.C. 29201

with sufficient postage affixed there to an unlocked copy of the Defendant's Motion for Extension of Time to Order Transcript which has been forwarded to the Honorable Jenny Abbot Kitchings, Clerk of Court South Carolina Court of Appeals for filing.

  
Sarah Ely-McCollum  
M. Gregory McCollum, PA  
516 29<sup>th</sup> Avenue North  
Myrtle Beach, SC 29577  
(843) 626-5480

September 18, 2013  
Myrtle Beach, SC

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SEP 20 2013  
**SC Court of Appeals**

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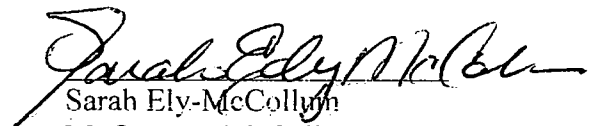
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Case No. 2013-GS-26-01340

**CERTIFICATE OF SERVICE**

I, Sarah Ely-McCollum, an employee of M. Gregory McCollum, counsel for the Appellant in the above-entitled action, certify that on September 18, 2013 I mailed by U.S. Mail properly addressed:

Robert M. Dudek, Chief Appellate Defender  
SC Commission on Indigent Defense  
Post Office Box 11433  
Columbia, South Carolina 29211-1433

with sufficient postage affixed there to an unlocked copy of the Defendant's Motion for Extension of Time to Order Transcript which has been forwarded to the Honorable Jenny Abbot Kitchings, Clerk of Court South Carolina Court of Appeals for filing.

  
Sarah Ely-McCollum  
M. Gregory McCollum, PA  
516 29<sup>th</sup> Avenue North  
Myrtle Beach, SC 29577  
(843) 626-5480

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Case No. 2013-GS-26-01340

**CERTIFICATE OF SERVICE**

I, Sarah Ely-McCollum, an employee of M. Gregory McCollum, counsel for the Appellant in the above-entitled action, certify that on September 18, 2013 I mailed by U.S. Mail properly addressed:

The Honorable Alan Wilson,  
Attorney General State of South Carolina  
P.O. Box 11549  
Columbia, S.C. 29211

with sufficient postage affixed there to an unlocked copy of the Defendant's Motion for Extension of Time to Order Transcript which has been forwarded to the Honorable Jenny Abbot Kitchings, Clerk of Court South Carolina Court of Appeals for filing.



Sarah Ely-McCollum  
M. Gregory McCollum, PA  
516 29<sup>th</sup> Avenue North  
Myrtle Beach, SC 29577  
(843) 626-5480

September 18, 2013  
Myrtle Beach, SC

# M. GREGORY MCCOLLUM

## ATTORNEY AT LAW

516 29TH AVENUE NORTH  
MYRTLE BEACH, SOUTH CAROLINA 29577  
WWW.CRIMINALLAWYERMYRTLEBEACH.COM

(843) 626-5480

September 17, 2013

Robert M. Dudek, Chief Appellate Defender  
SC Commission on Indigent Defense  
Post Office Box 11433  
Columbia, South Carolina 29211-1433

Re: **State vs. Kenneth Jordan Bell**

Burglary, 1<sup>st</sup> Degree, Indictment No.: 2013-GS-26-01335

Kidnapping, Indictment No.: 2013-Gs-26-01336

Possession of a Weapon during a Violent Crime, Indictment  
No: 2013-GS-26-01337

Armed Robbery/Deadly Weapon, Indictment No.: 2013-GS-26-01339

Criminal Conspiracy, Indictment No.: 2013-GS-26-01340

Arrest Date: February 2, 2013

Trial Dates: August 12, 2013 – August 15, 2012

Jury Verdict, Guilty: Burglary, 1<sup>st</sup> Degree, Sentence: 15 years, Kidnapping, 10  
years, Possession of a Weapon during a Violent Crime, 5 years, Armed  
Robbery/Deadly Weapon, 10 years, Criminal Conspiracy, 5 years

Sentence: 15 years, concurrent

Judge: Roger L. Couch

Court Reporter: Kay Richardson

Horry County, South Carolina

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**SC Court of Appeals**

Dear Mr. Dudek;

Please find enclosed a copy of the Affidavit of Indigency signed by Kenneth J. Bell. Additionally, enclosed is a copy of my second affidavit to be signed and notarized.


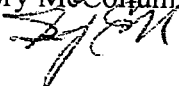
Finally, please find enclosed a copy of our First Motion for Extension of Time to Order the Transcript.

Please let me know if you need anything further at this time.

Robert M. Dudek  
Chief Appellate Defender  
Page 2  
September 17, 2013

With warm regards, I remain,

Yours truly,

  
M. Gregory McCollum  


MGM/sjem

Enclosure

cc: Honorable Jenny Abbott Kitchings, Clerk for Court of Appeals  
Wendy Jaworski

# M. GREGORY MCCOLLUM

## ATTORNEY AT LAW

516 29TH AVENUE NORTH  
MYRTLE BEACH, SOUTH CAROLINA 29577  
WWW.CRIMINALLAWYERMYRTLEBEACH.COM

**(843) 626-5480**

September 18, 2013

Mr. Kenneth J. Bell  
SCDC # 356689  
Kirkland Correctional Institution A2-39  
4344 Broad River Road  
Columbia, SC 29210

Re: **State vs. Kenneth Jordan Bell**  
Burglary, 1<sup>st</sup> Degree, Indictment No.: 2013-GS-26-01335  
Kidnapping, Indictment No.: 2013-Gs-26-01336  
Possession of a Weapon during a Violent Crime, Indictment  
No: 2013-GS-26-01337  
Armed Robbery/Deadly Weapon, Indictment No.: 2013-GS-26-01339  
Criminal Conspiracy, Indictment No.: 2013-GS-26-01340  
Arrest Date: February 2, 2013  
Trial Dates: August 12, 2013 – August 15, 2012  
Jury Verdict, Guilty: Burglary, 1<sup>st</sup> Degree, Sentence: 15 years, Kidnapping, 10  
years, Possession of a Weapon during a Violent Crime, 5 years, Armed  
Robbery/Deadly Weapon, 10 years, Criminal Conspiracy, 5 years  
Sentence: 15 years, concurrent  
Judge: Roger L. Couch  
Court Reporter: Kay Richardson  
Horry County, South Carolina

Dear Kenneth:



Please find enclosed a second Affidavit of Indigency for you sign in the presence of a notary. Please sign everywhere that is highlighted in yellow.

Kenneth J. Bell  
Page 2  
September 18, 2013

It is vital to your appeal that you properly complete this affidavit and return it to my office in the self-addressed, stamped envelope.

With warm regards, I remain,

Yours truly,

  
M. Gregory McCollum  


MGM/sjem

Enclosure

cc: Honorable Jenny Abbott Kitchings, Clerk for Court of Appeals  
Bob Dudek, Chief Appellate Defender  
Wendy Jaworski

# M. GREGORY MCCOLLUM

## ATTORNEY AT LAW

516 29TH AVENUE NORTH  
MYRTLE BEACH, SOUTH CAROLINA 29577  
WWW.CRIMINALLAWYERMYRTLEBEACH.COM

(843) 626-5480

September 17, 2013

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

Re: **State vs. Kenneth Jordan Bell**

Burglary, 1<sup>st</sup> Degree, Indictment No.: 2013-GS-26-01335

Kidnapping, Indictment No.: 2013-Gs-26-01336

Possession of a Weapon during a Violent Crime, Indictment  
No: 2013-GS-26-01337

Armed Robbery/Deadly Weapon, Indictment No.: 2013-GS-26-01339

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years, Possession of a Weapon during a Violent Crime, 5 years, Armed  
Robbery/Deadly Weapon, 10 years, Criminal Conspiracy, 5 years

Sentence: 15 years, concurrent

Judge: Roger L. Couch

Court Reporter: Kay Richardson

Horry County, South Carolina

Dear Ms. Kitchings;

Please find enclosed the original and seven (7) copies of the *Motion for Extension of Time to Order Transcript* along with my *Certificate of Service* regarding the above-referenced matter. Please forward a clocked copy of the motion and certificate of services to my office at your earliest convenience. Please find enclosed a self-addressed, stamped envelope for your convenience



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SC Court of Appeals

Page 2  
September 17, 2013  
Honorable Jenny A. Kitchings

Thank you for your assistance in this matter. If you should need any additional information, please do not hesitate to contact my office.

Yours truly,

  
M. Gregory McCollum  


MGM/sjem

Enclosure

cc: Honorable Alan Wilson, Attorney General  
Honorable Salley Elliot, Assistant Deputy Attorney  
Wendy Jaworski (E-mail)