

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

Patrick C. Fant, III, Circuit Court Judge

Indictment Nos.: 2022-GS-23-002194, 2024-GS-23-05425A
2024-GS-23-005412, 2024-GS-23-005413

The State of South Carolina

Respondent,

v.

Zachary David Hughes

Appellant.

**MOTION TO WITHDRAW AS COUNSEL AND MOTION FOR
EXTENSION OF TIME TO OBTAIN NEW COUNSEL**

Zachary David Hughes was convicted on February 20, 2025, after a jury trial and was sentenced to prison. The undersigned counsel were retained for the criminal case, but not the appeal. In keeping with our duties as defense counsel, we filed the notice of appeal on XXX on behalf of Appellant.

The undersigned do hereby respectfully request to be allowed to withdraw as counsel in this matter and be relieved from any further responsibility for this appeal. Counsel are unaware whether Appellant will qualify for the Office of Appellate Defense or whether he intends to retain counsel for his appeal.

In addition, counsel respectfully requests this Honorable Court allow Appellant 30 days from the date of any order from this Court to obtain new counsel and extend all

deadlines accordingly.

Respectfully submitted,



Andrew B. Moorman, Sr. (SC Bar # 69670)
Mark Moyer (SC Bar # 64155)
Moyer Law Firm, LLC
416 East North Street, 2nd Floor
Greenville, South Carolina 29601
(864) 775-5811
mark@markmoyerlaw.com
andy@andymoormanlaw.com

OTHER COUNSEL OF RECORD:
Walt Wilkins, Esquire
Greenville County Solicitor's Office
305 East North Street
Greenville, South Carolina 29601
wwilkins@greenvillecounty.org

February 26, 2025

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The State of South Carolina

Respondent,

v.

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Appellant.

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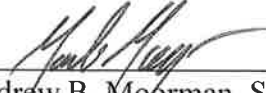
Zachary David Hughes was convicted on February 20, 2025, after a jury trial and was sentenced to prison. The undersigned counsel were retained for the criminal case, but not the appeal. In keeping with our duties as defense counsel, we filed the notice of appeal on XXX on behalf of Appellant.

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The State of South Carolina

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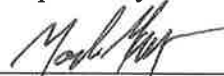
Zachary David Hughes

Appellant.

PROOF OF SERVICE

I certify that on this, the 26th day of February, 2024, Appellant's Motion to Withdraw as Counsel and Motion for Extension of Time to Obtain New Counsel was served on the Thirteenth Circuit Solicitor's Office by email and/or US Mail.

Respectfully submitted,



Andrew B. Moorman, Sr. (SC Bar # 69670)

Mark Moyer (SC Bar # 64155)

Moyer Law Firm, LLC

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Greenville, South Carolina 29601

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OTHER COUNSEL OF RECORD:

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Greenville County Solicitor's Office

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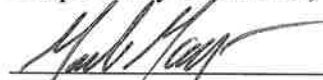
Indictment Nos.: 2022-GS-23-002194, 2024-GS-23-05425A
2024-GS-23-005412, 2024-GS-23-005413

The State of South Carolina Respondent,
v.
Zachary David Hughes Appellant.

PROOF OF SERVICE

I certify that on this, the 26th day of February, 2024, Appellant's Motion to Withdraw as Counsel and Motion for Extension of Time to Obtain New Counsel was served on the Attorney General's Office by email and/or US Mail.

Respectfully submitted,



Andrew B. Moorman, Sr. (SC Bar # 69670)

Mark Moyer (SC Bar # 64155)

Moyer Law Firm, LLC

416 East North Street, 2nd Floor

Greenville, South Carolina 29601

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OTHER COUNSEL OF RECORD:

Walt Wilkins

Greenville County Solicitor's Office

305 East North Street

Greenville, South Carolina 29601

wwilkins@greenvillecounty.org

February 26, 2025



February 26, 2025

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SC Court of Appeals

Alan Wilson, Esquire
Attorney General
Post Office Box 11549
Columbia, South Carolina 29211

RE: Motion to Withdraw as Counsel and Motion for Extension of Time to Obtain
New Counsel for Zachary David Hughes
Indictment Nos.: 2022-GS-23-002194, 2024-GS-23-05425A
2024-GS-23-005412, 2024-GS-23-005413

Dear Mr. Wilson,

Please find enclosed the Motion to Withdraw as Counsel and Motion for
Extension of Time to Obtain New Counsel for Kenneth Lewis. I am also enclosing the
Proof of Service.

Let me know if you need anything else from me or have any questions. With
kind regards, I am

Truly Yours,

Mark Moyer
Moyer Law Firm, LLC

Enclosures

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

416 East North Street, 2nd Floor
Greenville, South Carolina 29601
864.775.5811
mark@markmoyerlaw.com



February 26, 2025

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Feb 26 2025

SC Court of Appeals

Sent via US Mail and Email (wwilkins@greenvillecounty.org)

Walt Wilkins, Esquire
Greenville County Solicitor's Office
305 East North Street
Greenville, South Carolina 29601

RE: The State v. Zachary David Hughes
Indictment Nos.: 2022-GS-23-002194, 2024-GS-23-05425A
2024-GS-23-005412, 2024-GS-23-005413

Dear Solicitor Wilkins,

Please find enclosed the Motion to Withdraw as Counsel and Motion for Extension of Time to Obtain New Counsel for Kenneth Lewis. I am also enclosing the Proof of Service.

Let me know if you need anything else from me or have any questions. With kind regards, I am

Truly Yours,

Mark Moyer
Moyer Law Firm, LLC

Enclosures

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

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Greenville, South Carolina 29601
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Feb 26 2025

SC Court of Appeals

February 26, 2025

Sent via US Mail and Email (ctappfilings@sccourts.org)

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

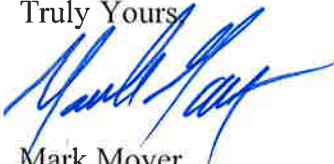
RE: The State v. Zachary David Hughes
Indictment Nos.: 2022-GS-23-002194, 2024-GS-23-05425A
2024-GS-23-005412, 2024-GS-23-005413

Dear Ms. Kitchings,

Please find enclosed the original Motion to Withdraw as Counsel and Motion for Extension of Time to Obtain New Counsel for Zachary Hughes. I have also enclosed a certificate of service.

I have enclosed two additional copies of the Motion. Please file the original and return the clocked copies in the enclosed envelope.

Please contact me at your convenience if you need any additional information or if I can help in any way. With kind regards, I am

Truly Yours

Mark Moyer
Moyer Law Firm, LLC

Enclosures

416 East North Street, 2nd Floor
Greenville, South Carolina 29601
864.775.5811
mark@markmoyerlaw.com