

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

Robert Hood, Circuit Court Judge

Case No. 2013-GS-32-00392, 2013-GS-32-100393

Thomas Lee Stafford,.....Appellant.

vs


The State of South Carolina,.....Respondent.

**MOTION TO FILE NOTICE OF INTENT TO APPEAL IN COURT OF APPEALS
OUTSIDE OF THE DEADLINE**

Thomas Lee Stafford appeals his plea and sentence in this case. The sentence was imposed by the Honorable Robert Hood on October 3, 2013. Upon sentencing, a timely Notice of Intent to Appeal was filed correctly with the Lexington County Clerk of Court's office and properly served on the appropriate parties (see attached Notice of Intent to Appeal and Proof of Service). Due to an office error which was just discovered, the Notice of Intent to Appeal was never forwarded to the Court of Appeals for filing, despite the timely notice filed in Lexington County.

We now move this court to accept the Notice of Intent to Appeal in the Court of Appeals outside of the deadline since it was timely filed in Lexington County and served on the appropriate parties.

Respectfully submitted,



Anna R. Good

Law Office of Anna Good, LLC
1720 Main Street, Suite 303
Columbia, South Carolina 29201
Telephone: (803) 429-9107
Fax: (803) 799-4059

RECEIVED

NOV 19 2013

SC Court of Appeals

November 19, 2013

Attorney for the Appellant

COPY FILED

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

2013 OCT -9 AM 11: 22

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

BETH A. CARRIGG
CLERK OF COURT
LEXINGTON SC

Robert Hood, Circuit Court Judge

Case No. 2013-GS-32-00392, 2013-GS-32-100393

State of South Carolina, Respondent.

v.

Thomas Lee Stafford, Appellant.

NOTICE OF APPEAL

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2013-GS-32-00393 – Driving Under the Influence, death results - 17years, concurrent to all others, credit for time served since December 4, 2012

2013-GS-32-00392 – Hit and Run - 17years, concurrent to all others, credit for time served since December 4, 2012



Anna Good, Esquire

Law Office of Anna Good
1720 Main Street, Suite 303
Columbia, South Carolina 29201
(803) 429-9107
Attorney for Appellant

This 8th day of October, 2013

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NOV 19 2013

SC Court of Appeals

Other Counsel of Record:

Assistant Solicitor Rick Collins
Office of the Solicitor, Eleventh Judicial Circuit
Lexington County Judicial Center
205 East Main Street
Lexington, SC 29072

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

2013 OCT -9 AM 11: 23

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

BETH A. CARRIGG
CLERK OF COURT
LEXINGTON SC

Robert Hood, Circuit Court Judge

Case No. 2013-GS-32-00392, 2013-GS-32-100393

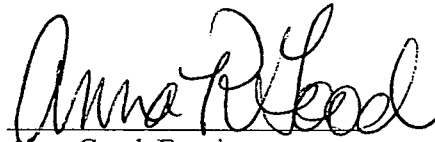
State of South Carolina, Respondent.

v.

Thomas Lee Stafford, Appellant.

PROOF OF SERVICE

I hereby certify that a true copy of the Notice of Intent to Appeal in the above-referenced case has been served upon opposing counsel by delivering same this date to her office at the Office of the Solicitor, Eleventh Judicial Circuit, 205 East Main St., Lexington, SC 29072.


Anna Good, Esquire

Law Office of Anna Good
1720 Main Street, Suite 303
Columbia, South Carolina 29201
(803) 429-9107
Attorney for Appellant

This 8th day of October, 2013

Other Counsel of Record:

Assistant Solicitor Rick Collins
Office of the Solicitor, Eleventh Judicial Circuit
Lexington County Judicial Center
205 East Main Street
Lexington, SC 29072

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November 19, 2013

Attorney for the Appellant