

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Post Conviction Relief

The Honorable James R. Barber, III, Circuit Court Judge

Case No. 2012-CP-40-07145

Jaymes M. Woods, #315669 Petitioner,

vs.

State of South Carolina, Respondent.

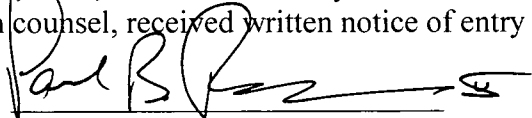
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DEC 02 2013

S.C. SUPREME COURT

NOTICE OF APPEAL

Jaymes M. Woods, through undersigned, appeals the Order of Dismissal issued by the Honorable James R. Barber, III on October 28, 2013, which was filed by mail on November 5, 2012 and November 12, 2013. Petitioner, through counsel, received written notice of entry of this Order on November 19, 2013.


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Attorney for Petitioner

Other Counsel of Record:

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Assistant Attorney General
Post-Conviction Relief Section
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Rembert Dennis Building
1000 Assembly Street, Room 519
Columbia, S.C. 29201

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2012CP4007145

Jaymes M #315669 Woods

State of South Carolina

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: _____

Attorney for : Plaintiff Defendant or Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit);
 Rule 43(k), SCRPC (Settled); Other _____
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded; Other _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

This order ends does not end the case.

Additional Information for the Clerk : _____

INFORMATION FOR THE PUBLIC INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order: _____

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge _____ Judge Code _____ Date _____

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20 _____ and a copy mailed first class or placed in the appropriate attorney's box on this 12 November 2013 to attorneys of record or to parties (when appearing pro se) as follows:

Jaymes M #315669 Woods

Paul B. Rodgers III

Robert Daniel Corney

Jaymes M #315669 Woods

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter _____

Clerk of Court

Jeanette W. McFarland

RICHLAND COUNTY
FILED
2013 NOV 12 PM 11:45
JANETTE W. MCFARLAND
CLERK OF COURT

STATE OF SOUTH CAROLINA)
)
 COUNTY OF RICHLAND)
)
 Jaymes M. Woods, #315669,)
)
 Applicant,)
)
 v.)
)
 State of South Carolina,)
)
 Respondent.)
 _____)

IN THE COURT OF COMMON PLEAS

2012-CP-40-7145

ORDER OF DISMISSAL

RICHLAND COUNTY
 FILED
 2013 NOV -5 PM 2:10
 JEANETTE V. HERRIDGE
 C.C.P. & G.S.

This matter comes before the Court by way of an Application for Post-Conviction Relief filed October 22, 2012. An evidentiary hearing was convened on October 1, 2013, at the Richland County Courthouse.¹ The Applicant was present at the hearing and was represented by Paul B. Rodgers, Esquire. The Respondent was represented by Mary S. Williams of the South Carolina Attorney General's Office.

At the hearing, the Applicant testified on his own behalf. Also testifying was Luke Shealey, Esquire ("Counsel"). This Court had before it the records of the Richland County Clerk of Court, the guilty plea transcript, the appellate records, and the Applicant's records from the South Carolina Department of Corrections.

PROCEDURAL HISTORY

The records before this Court indicate that The Applicant is presently confined in the South Carolina Department of Corrections pursuant to orders of commitment of the Richland County Clerk

¹ Applicant, through counsel, had requested a continuance because counsel had been unable to meet with him due to lock downs and other issues at the correctional facility. This court permitted counsel to meet with Applicant while other hearings that day proceeded. Applicant's case was called last after conferring with counsel. Upon this court's inquiry Applicant was ready to proceed with his case and did not need additional time to prepare with his attorney. As per

of Court. The Applicant was indicted for Criminal Sexual Conduct (“CSC”) with a Minor – 2nd Degree (2007-GS-40-7907). Luke Shealey, Esquire, represented him. On December 9, 2008, the Applicant pled guilty before the Honorable Kenneth G. Goode. Applicant was sentenced to fifteen (15) years imprisonment. Applicant moved for a reconsideration of sentence, and the matter was heard by the Honorable Allison Renee Lee on December 9, 2009. Judge Lee denied Applicant’s request to reconsider his sentence.

A notice of appeal was filed and an appeal perfected. On appeal, Woods argued that Judge Goode should have recused himself following disclosure that his own daughter had been the victim of a sexual assault. The Court of Appeals affirmed the conviction, finding the issue not preserved for review. State v. Wood, Op. No. 2012-UP-129 (S.C. Ct. App. filed February 29, 2012). The Remittitur was sent on March 16, 2012.

In his application for post-conviction relief (PCR), Applicant alleges that he is being held in custody unlawfully for the following reasons:

1. “Violation of 4th, 6th, and 14th U.S. Amendment rights collectively.”
 - a. “Plea judge erred in accepting Defendant’s competence level ... Defendant barely had a high school education, much less any legally acceptable levels of competent knowledge of legal procedure, so therefore the Defendant was not legally and constitutionally competent to make any decisions the court was collectively coercing the Defendant into making.”
2. “Violation of 6th and 14th U.S. Amendment rights collectively.”
 - a. Counsel was ineffective where “Defense attorney states that ‘he hasn’t seen no video, but if the State says it exists, then I’m comfortable with it.’”
3. “Violation of 14th U.S. Amendment right.”
 - a. “...Plea judge posited on the legal record that he personally holds ‘the only opinion that matters’ as regards the Defendant when Plea Judge spoke at length about the sexual abuse of his own daughter, even violating his own daughter’s constitutional rights to privacy in an effort to prejudice the Defendant in the minds of the people and not once does Defense counsel

Applicant’s assertions after meeting with his attorney, this court found that Applicant and counsel had adequate time to confer and that Applicant wished to proceed.

move to halt this injustice being done to his client. ...”

An amended application was filed by PCR counsel addressing Applicant’s claims that Counsel should have moved for withdrawal of Applicant’s plea and/or recusal of the plea judge, Applicant’s lack of requisite competence, failure to negotiate a plea agreement with the State, and Counsel’s handling of a photograph discussed at plea.²

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This Court has had the opportunity to review the record in its entirety and has heard the testimony at the post-conviction relief hearing. This Court has further had the opportunity to observe the witnesses presented at the hearing, closely pass upon their credibility and weigh their testimony accordingly. Set forth below are the relevant findings of facts and conclusions of law as required pursuant to S.C. Code Ann. §17-27-80.

Ineffective Assistance of Counsel

The Applicant alleges he received ineffective assistance of counsel. In a PCR action, “[t]he burden of proof is on the applicant to prove his allegations by a preponderance of the evidence.” Frasier v. State, 351 S.C. 385, 389, 570 S.E.2d 172, 174 (2002) (citing Rule 71.1(e), SCRPC). Where ineffective assistance of counsel is alleged as a ground for relief, the Applicant must prove that “counsel's conduct so undermined the proper functioning of the adversarial process that the trial cannot be relied upon as having produced a just result.” Strickland v. Washington, 466 U.S. 668, 104 S.Ct. 2052, 2064, 80 L.Ed.2d 674, 692 (1984); Butler v. State, 286 S.C. 441, 334 S.E.2d 813 (1985).

The proper measure of performance is whether the attorney provided representation within

² While the application and amendment make reference to a “video,” it appears that only a photograph was discussed

the range of competence required in criminal cases. Courts presume that counsel rendered adequate assistance and made all significant decisions in the exercise of reasonable professional judgment. Butler, Id. The Applicant must overcome this presumption to receive relief. Cherry v. State, 300 S.C. 115, 386 S.E.2d 624 (1989).

First, the Applicant must prove that counsel's performance was deficient. Under this prong, attorney performance is measured by its "reasonableness under professional norms." Cherry, 300 S.C. at 117, 385 S.E.2d at 625 (citing Strickland, supra). Second, counsel's deficient performance must have prejudiced the Applicant such that "there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different." Cherry, 300 S.C. at 117-18, 386 S.E.2d at 625. "A reasonable probability is a probability sufficient to undermine confidence in the outcome of trial." Johnson v. State, 325 S.C. 182, 186, 480 S.E.2d 733, 735 (1997) (citing Strickland). With respect to guilty plea counsel, the Applicant must show that there is a reasonable probability that, but for counsel's alleged errors, he would not have pled guilty and would have insisted on going to trial. Hill v. Lockhart, 474 U.S. 52, 106 S.Ct. 366, 88 L.Ed. 2d 203 (1985).

Withdrawal of Plea

Applicant argues that Counsel erred in failing to move for withdrawal of his guilty plea. Applicant purports as basis for his withdrawal the revelation that Judge Goode's daughter had suffered a sexual assault. As prejudice, Applicant asserts that the judge's personal experience in this regard resulted in a higher sentence. When this disclosure occurred, the plea had already been accepted. Applicant therefore was not entitled to withdraw his plea as a matter of right. Thomson v.

at the guilty plea proceeding. Therefore, this court interprets Applicant's claim to be regarding the photo.

State, 355 S.C. 278, 285, 585 S.E.2d 143, 146 (2003). Furthermore, “[a]n accused is not permitted to speculate on the supposed clemency of the judge and enter a plea of guilty with the right to retract it if he finds that his expectation was not realized.” State v. Cantrell 250 S.C. 376, 380, 158 S.E.2d 189, 191-192 (1967).

This court notes the solicitor stated at the outset of the plea that there had been no plea negotiations. (Plea Tr. p. 3, lines 8-9.) Applicant was informed that he faced a sentence up to twenty (20) years. (Plea Tr. p. 3, lines 22-25.) Citing Applicant’s prior record (which included burglary and a prior sexual offense involving a thirteen-year-old) and failure to complete probationary sentences without reoffending, the solicitor asked for a sentence of “*at least* ten years.” [Emphasis supplied.] (Plea Tr. p. 9, lines 5-22.) The defense countered with mitigating circumstances and asked the court to consider a sentence “in the range of three years.” (Plea Tr. p. 15, lines 7-19.) Applicant was informed of the offense he was pleading to, advised of his rights to a jury trial, and agreed with the solicitor’s statement of facts, including a statement in which he admitted the conduct. (Plea Tr. p. 3, line 13-p. 4, line 8; p. 4, line 24 – p. 6, line 9.)

Further, Applicant gave conflicting testimony regarding his desire for a trial. Applicant initially stated that his plea was fine, but the sentence was tainted. Applicant conceded he was willing to admit what happened and wanted a plea bargain. Applicant even stated he would have simply asked to plead at a later date if he had known that Goode’s daughter had experienced sexual assault. Applicant also testified, however, that he did want a trial and not a plea.

In context of the plea, it appears that Judge Goode was making a comment that even without ostensible violence, all crimes of this nature have perpetual effects upon the victims. Moreover, the the sentence pronounced by Judge Goode was within permissible range and did not appear to be

motivated by any bias or prejudice but rather by factors including Applicant's own criminal record (including a prior sexual offense), his inability to complete probationary supervision, the facts of the case (his repeated pursuit of the child after multiple warnings not to), and even the victim's mother's plea for a substantial sentence.

It appears from the record that Applicant's desire to have Counsel withdraw his plea is a result of a sentence in excess of what he expected and not as a result of any error during the plea or any desire at the time for a trial. It has long been held that withdrawal of a plea

...should not be made use of solely because of defendant's surprise at the severity of the sentence imposed, in the absence of some showing that the plea was induced by fraud, misrepresentation, or other unfair or undue means on the part of the prosecuting attorney or the presiding judge, nor unless the defendant, upon the hearing of the motion for leave to withdraw his plea, makes a prima facie showing of some probable defense to the charges against him.

State v. Harvey, 123 S.E. 201, 202 (1924). In this case, I find no error in the plea nor sufficient evidence of prejudice on the part of Judge Goode to suggest that withdrawal of Applicant's plea would have been appropriate, and Counsel's failure to move for withdrawal of the plea based on severity of the sentence was not deficient performance. Further, Applicant has failed to set forth any evidence of prejudice in this regard.

Recusal

In the alternative, Applicant asserts that Counsel was deficient in failing to move for Judge Goode's recusal in the matter following the comment about his daughter's experience and pressure due to a case heard the prior day.

As set forth in Mallett v. Mallett, 323 S.C. 141, 146-147, 473 S.E.2d 804, 808 (Ct. App. 1996):

...the alleged bias must be personal as distinguished from judicial. Davis v. Board of Sch. Comm'rs, 517 F.2d 1044 (5th Cir.1975); Roper, 447 S.E.2d 218. Likewise, the bias must stem from extrajudicial sources and result in a decision on the merits based on considerations other than what the judge learned from his participation in the case. Id. A motion to recuse may not be predicated on the judge's rulings in the case before him or on rulings in a related case, nor on his demonstrated tendency to rule in any particular manner, or on a particular judicial leaning or attitude derived from his experience on the bench. United States v. Grinnell Corp., 384 U.S. 563, 86 S.Ct. 1698, 16 L.Ed.2d 778 (1966); Berger v. United States, 255 U.S. 22, 31, 41 S.Ct. 230, 232, 65 L.Ed. 481 (1921).

With regard to the argument that the judge should be recused due to his remark about his daughter, "the fair meaning of any remark must be interpreted in the light of the context in which it is uttered in determining whether the remarks show personal bias or prejudice on the part of the judge sufficient to require that he be disqualified." Shaw v. State, 276 S.C. 190, 193, 277 S.E.2d 140, 141 (1981). As noted above, the remark does not show personal bias or prejudice against the defendant; the remark notes the judge's reflection that even though not a crime ostensibly involving violence, the event would affect the victim.

With regard to the allegation that Counsel should have moved to have Judge Goode recused due to media scrutiny, I likewise find this assertion to be without merit. Judges, in the execution of their duties, are inherently subject to public scrutiny. To fail to move for recusal of a judge in one case due to scrutiny in a separate, unrelated case, without more, would not be outside the realm of competence.

I further decline to find prejudice in the length of Applicant's sentence. As noted above and by Judge Lee at hearing on Applicant's Motion to Reconsider (Motion Tr. p. 16, line 17 – p. 20, line 3.) Applicant's case presented several bases for the sentence imposed: seriousness of the offense,

Applicant's prior record (including a similar offense), his failure to complete probationary sentences without reoffending, the State's request for *at least* ten (10) years, and the facts of the case (including Applicant's knowledge of victim's age and warnings to stay away from her). There further appears no evidence that Judge Goode was actually aware of or influenced by any media scrutiny.

For these reasons, I find that Counsel was not deficient in failing to move for recusal of Judge Goode in this matter and find no evidence of prejudice from any alleged deficiency.

Competence

In his application and amended application, Applicant asserts that he was not competent to enter a guilty plea by virtue of his education level and lack of legal expertise. At the time of Applicant's plea, he had already had significant interaction in the legal system, having faced charges of CSC with a Minor 2nd Degree in 2004 (resulting in a plea to Assault and Battery of a High and Aggravated Nature) and Burglary 1st Degree in 2006 (resulting in a plea to Burglary 2nd Degree). The plea transcript also reflects that Applicant obtained a GED while incarcerated (Plea Tr. p. 11, line 22), and Applicant states in his application that he "barely had a high school education." Applicant made appropriate responses to all questions asked during his plea, and in this court's observation of Applicant during hearing, he was likewise appropriate and coherent. No additional evidence was presented which would cast doubt on Applicant's competence to enter his plea. Based on these facts, Applicant has failed to demonstrate that his plea was rendered involuntary due to any competence issue and has likewise failed to demonstrate any shortcoming by counsel.

Sentence Negotiation

Applicant presented no evidence regarding this allegation at hearing, but in his amended application states that there had been no efforts at negotiation of a favorable sentence

recommendation. Based on a review of the record, Applicant has failed to set forth sufficient evidence to demonstrate that Counsel's failure to secure a recommendation of a favorable sentence was deficient performance in this case.

Reference to Photo

Applicant presented no additional evidence regarding this allegation. The photograph of the act was mentioned during the plea by the victim's mother after Applicant's plea was accepted. (Plea Tr. p. 7, line 20 – p. 8, line 3; p. 8, lines 17-18.) Counsel stated that he had not seen a photograph in discovery, but it appears Counsel knew of its existence and noted that Applicant had no role in taking or disseminating the photo. (Plea Tr. p. 11, lines 4-12.) It appears that Applicant would have Counsel object to mention of the photograph. The Circuit Court may conduct broad inquiry to "assist it in determining the sentence to be imposed." Thomason v. State, 355 S.C. 278, 285, 584 S.E.2d 143, 147 (2003). It is also appropriate for victims to be heard during sentencing. Id. at 286. Therefore, I find no basis for Counsel to object. Based on the record, I find that Applicant has not carried his burden in this regard.

Other Allegations

No other allegations were raised at the PCR hearing. Therefore, any additional allegations are deemed waived because no evidence was presented.

CONCLUSION

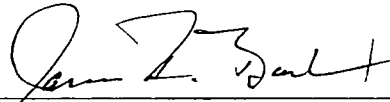
Based on all the foregoing, this Court finds and concludes that the Applicant has not established any constitutional violations or deprivations that would require this court to grant his application. Therefore, this application for post conviction relief must be denied and dismissed with prejudice.

This Court advises Applicant that he must file a notice of intent to appeal within thirty (30) days from the receipt of this Order to secure the appropriate appellate review. His attention is also directed to Rule 243, SCACR, for appropriate procedures after notice has been timely filed.

IT IS THEREFORE ORDERED:

1. That the Application for Post-Conviction Relief must be DENIED AND DISMISSED WITH PREJUDICE; and
2. The Applicant must be remanded to the custody of the Respondent.

AND IT IS SO ORDERED this 28 day of October, 2015.



JAMES R. BARBER, III
Presiding Judge
Fifth Judicial Circuit

Columbia, South Carolina.

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

Jaymes M. Woods, #315669)
 Plaintiff)

v.)

State Of South Carolina)
 Defendant.)

IN THE COURT OF COMMON PLEAS

CASE NO.
2012-CP-40-7145

MOTION AND ORDER INFORMATION
FORM AND COVER SHEET

RICHLAND COUNTY
FILED
2013 NOV -5 PM 2:30
JEANETTE W. HODGSON
C.C.P. & S.

Plaintiff's Attorney: Paul B. Rodgers, III, Bar No. Address: Post Office Box 5825 Columbia, SC 29250 phone: fax: e-mail: other:	Defendant's Attorney: Mary S. Williams, Bar No. Address: P.O. Box 11549 Columbia, SC 29211 phone: (803) 734-3737 fax: (803) 734-4113 e-mail: other:
---	---

MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion:
 Estimated Time Needed: Court Reporter Needed: YES / NO

SECTION II: Motion/Order Type

Written motion attached
 Form Motion/Order
 I hereby move for relief or action by the court as set forth in the attached proposed order.

Mary S. Williams
 Signature of Attorney for Plaintiff / Defendant

October 21, 2013
Date submitted

SECTION III: Motion Fee

PAID - AMOUNT:
 EXEMPT: Rule to Show Cause in Child or Spousal Support
 (check reason) Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRPC)
 Proposed order submitted at request of the court; or,
 reduced to writing from motion made in open court per judge's instructions
 Name of Court Reporter:
 Other:

JUDGE'S SECTION

Motion Fee to be paid upon filing of the attached order.
 Other:

JUDGE

CODE: _____ Date: _____

CLERK'S VERIFICATION

Collected by: _____ Date Filed: _____

MOTION FEE COLLECTED: _____
 CONTESTED - AMOUNT DUE: _____

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Post Conviction Relief

The Honorable James R. Barber, III, Circuit Court Judge

Case No. 2012-CP-40-07145

Jaymes M. Woods, #315669 Petitioner,

vs.

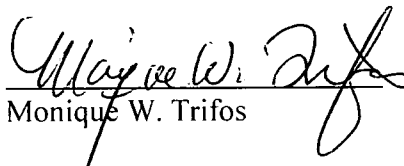
State of South Carolina, Respondent.

CERTIFICATE OF SERVICE

This is to certify that I, Monique W. Trifos, an employee in the law firm of Paul B. Rodgers, III, Attorney at Law, attorney for Petitioner, Jaymes M. Woods, # 315668, have this day caused to be served upon the persons named below the Petitioner's Notice of Appeal in the above captioned matter by placing a copy of same in the United States mail, first class, postage pre-paid, addressed as follows:

Mary S. Williams, Esquire
Assistant Attorney General
Post-Conviction Relief Section
South Carolina Office of the Attorney General
Rembert Dennis Building
1000 Assembly Street, Room 519
Columbia, S.C. 29201

SC Commission of Indigent Defense
Appellate Defense
P.O. Box 11589
Columbia, SC 29211


Monique W. Trifos

Columbia, South Carolina
27th day of November, 2013.

PAUL B. RODGERS, III
ATTORNEY AT LAW

P.O. BOX 5825
COLUMBIA, SOUTH CAROLINA 29250-5825

TELEPHONE (803) 783-3577

TELECOPIER (803) 783-3577

November 27, 2013

The Honorable Daniel E. Shearouse
Court, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RECEIVED

DEC 02 2013

S.C. SUPREME COURT

Re: Jaymes M. Woods, #315669 v. State of South Carolina.
Civil Action No: 2012-CP-40-07145

Dear Mr. Shearouse:

Enclosed for filing is the original and one (1) copy of the Plaintiff's Notice of Intent to appeal with Certificate of Service as well as a copy of the Order of Dismissal that is being appealed. We would appreciate your filing the original, stamping a clocked copy of the enclosed for our files, and returning the same to us in the stamped, self-addressed envelope provided.

I am sending a copy of this letter and the attached documents to the Office of Appellate Defense. I will forward to the Plaintiff an Affidavit of Indigency, and I will send that Affidavit to the Office of Appellate Defense upon receipt.

By copy of this correspondence to Mary Williams, Assistant Attorney General, I am serving a copy of the enclosed on her.

Thank you for your attention to the above.

Sincerely,



Paul B. Rodgers, III

PBR/mwt

Enclosures

cc: Mary S. Williams, Esquire, (w/enclosures and regular mail, via e-mail, mwilliams@scag.gov)
Office of Appellate Defense (w/enclosures)
Jaymes M. Woods (w/enclosures)

Paul B. Rodgers
Attorney at Law
P.O. Box 5825
Columbia, SC
29250

\$1.920
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|||||
The Honorable Daniel E. Shearouse
Court, Supreme Court of South Carolina
P.O. Box 11330
Columbia SC 29211-1330