

SAMUEL S. OWENS
VS.
The STATE OF SOUTH
Carolina County
of Spartanburg

DECEMBER 22, 2013

MOTION to APPEAL:

Now Comes the defendant Samuel Stevenson
owens. Move this Honorable Court to Appeal His
Conviction of (17) seventeen years for the Crime of
Criminal Sexual Conduct. Defendant was
represented by Attorney John Reckenbeil and
took and unwanted plea. Defendant ask
this Honorable Clerk to file and Clerk
Stamp this motion and pass it to the
proper office of Courts and with a
return copy back to him.

FILED
CLERK OF COURT
2013 DEC 30 AM 11:03
M. HOPE BLACKLEY

December 22, 2013^{PM}

Samuel S. Owens SCDC# 358263
Kirkland Reception and Evaluation Center F3-B15/1
4344 Broad River Rd.
Columbia, SC 29210

Clerk of Court
180 Magnolia St
Spartanburg, SC 29303

FILED
CLERK OF COURT
2013 DEC 30 AM 11:03
M. HOPE BLACKLEY

I thank this Honorable Clerk for
all the help that it can give in helping
me in this matter.

Sincerely
Samuel Owens

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JAN 06 2014

SC Court of Appeals

M1754074
2011-0214

Arrival Slips - Box # 358263

Kirkland Reception and Evaluation Center F3-B15
4344 Broad River Rd,
Columbia SC 29210



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Spartanburg, SC 29303

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**LEGAL
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ONLY**

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions
R. Keith Kelly, Circuit Court Judge

Case No.: 2011GS4206214-5

The StateRespondent.
vs.
Samuel OwensAppellant.

CERTIFICATE OF SERVICE

I, Keri A. Eadie, the undersigned paralegal to John G. Reckenbeil, certify that I have hand delivered and/or mailed a copy of the herein below listed pleading to person in this matter, on this 2nd day of January 2014, as follows:

PLEADING: Notice of Appeal, Motion to Extend Deadline, and Motion to be Relieved as Counsel

PERSON SERVED: Amy Goulding
Assistant Solicitor
180 Magnolia Street
Spartanburg, SC 29306

Hope Blackley
Clerk of Court
180 Magnolia Street
Spartanburg, SC 29306

Jenny Kitchings
Clerk of Court
Post Office Box 11629
Columbia, SC 29211

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JAN 06 2014

SC Court of Appeals

A handwritten signature in cursive script that reads "Keri Eadie". The signature is written in black ink and is positioned above a horizontal line.

Keri A. Eadie

Paralegal to John G. Reckenbeil, Esq.

P.O. Box 1633

Spartanburg, SC 29304

(864) 582-5472

Fax (864) 582-7280

Dated: January 2, 2014
Spartanburg, South Carolina

January 2, 2014

Jenny Abbott Kitchings
Clerk of Court
Post Office Box 11629
Columbia, SC 29211

RE: The State vs. Samuel Owens
Case No.: 2011GS4206214-5

Dear Clerk of Court:

You will find enclosed three (3) copies of Appellant's Notice of Appeal, an original and six (6) copies of a Motion to be Relieved as Counsel and a Motion to Extend Deadline in regards to the above-referenced case along with a Certificate of Service for the same. I ask that you please file this in accordance with the Rules of Appellate Procedure and return the copies to me in the self-addressed, stamped envelope provided for your convenience.

Please be advised my client previously instructed me not to file an appeal but has now filed one pro se. I will not have any responsibility, nor will I take part in Mr. Owens' appeal for Mr. Owens is indigent.

Should you have any questions or concerns, please feel free to contact my office.

Yours very truly,


John G. Reckenbeil

JGR/kae

Enclosure

CC: Samuel Owens, SCDC # 358263
Kirkland Reception and Evaluation Center E3-B151
4344 Broad River Road
Columbia, SC 29210

Amy Goulding, Assistant Solicitor [via hand delivery only]

RECEIVED

JAN 06 2014

SC Court of Appeals