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January 30, 2014

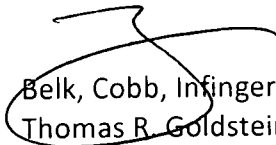
Hon. Daniel E. Shearhouse
Clerk of Court
Supreme Court of South Carolina
P. O. Box 11330
Columbia, S.C. 29211

Re: Tiffany Sanders adv. State of South Carolina
2011-CP-18-1497

Dear Mr. Shearhouse,

I enclose an original and 7 copies of the Petitioner's Return to the State's Motion to Strike in the above case. Will you please file the original and return a clocked in copy to me in the envelope provided? By copy of this letter, I am serving a copy on opposing counsel. I thank you in advance for your attention to this request. With kind regards, I am

Very truly yours,



Belk, Cobb, Infinger & Goldstein, P.A.
Thomas R. Goldstein

Enclosure: return to motion to strike, certificate of mailing, return envelope
cc: Salley W. Elliott, Esq.

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTER COUNTY
General Sessions
Common Pleas

Dianne Goodstein, General Sessions Judge
Deandrea G. Benjamin, Common Pleas Judge

RECEIVED

FEB 04 2014

S.C. Supreme Court

Case No. 2011-CP-18-1497

Tiffany Sanders, Appellant,

vs.

State of South Carolina Respondent,

PROOF OF SERVICE

I certify that I have served the Petitioner's Return to the State's Motion to Strike on the State of South Carolina by depositing a copy in the United States Mail, postage prepaid, on January 30, 2014, addressed to the State's attorneys of record, Sally W. Elliott, P. O. Box 11549, Columbia, S.C. 29211.

January 30, 2014



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(843) 554-4291; (843) 554-5566 fax
Attorneys for the Petitioner

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTER COUNTY
Court of General Sessions
Court of Common Pleas

Dianne S. Goodstein, Circuit Court Judge
Deandrea G. Benjamin, Circuit Court Judge

Case No. 2011-CP-18-1497

Tiffany Sanders, Appellant,

vs.

State of South Carolina Respondent,

PETITIONER'S RETURN TO STATE'S MOTION TO STRIKE

January 30, 2014

Dale T. Cobb #1291
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ATTORNEYS FOR APPELLANT

The State's January 21, 2014, Motion to Strike is a clear and cogent legal argument, and there is little with which Appellant disagrees. However, the Court should deny the State's Motion because it fails to address the salient point, and the State's failure is probably due to the Appellant's/Petitioner's failure to articulate the issue before the Court, thereby causing confusion for the State. The parties' main dispute arises under the State's argument contained on pages 3-4 of its Motion under the heading "III." The sole issue in the State's Motion to Strike is whether the Petitioner can or cannot make reference to the circuit court's May 2012 roster of P.C.R. cases to show that Sean Kammerer was scheduled for the same term as Tiffany Sanders and therefore physically available for the P.C.R. hearing.¹ However, the issue raised by the Petition has never been his physical proximity to the courtroom—and thus his physical availability—but rather that he refused to speak with Petitioner's counsel despite a diligent effort to interview him, which is further evidence of trial counsel's deficient performance.

The State misapprehends Petitioner's application for post-conviction relief, and this is due, in part, to Petitioner's failure to articulate clearly. The State is correct that an applicant seeking post-conviction relief must have her witnesses at the P.C.R. hearing. As the record demonstrates, the Petitioner called three live witnesses at the P.C.R. hearing: the Petitioner, her sister, an eyewitness, and her mother. The parties put Jessica Hans' testimony in by stipulation. (See Appendix at page 90.) It is undisputed—as evidenced by the November 19, 2012, Orders attached to the State's Motion to Strike—that Sean Kammerer was physically present for the same term, but not available to be called because he was on the same roster as Tiffany Sanders and

¹ For the Court's convenience, another copy of this roster is attached here.

demanding new counsel. The Petitioner is grateful to the State for providing the circuit court's Orders because they bolster the Petitioner's position, especially when read in light of P.C.R. Counsel's letters of July 1, 2011 and August 3, 2011, attached hereto. The State misapprehends the basis for the Petitioner's request for post-conviction relief. The basis for relief is her assertion that her lawyer failed to provide effective assistance. This assertion is based on the undisputed fact that, among other things, **her trial counsel never attempted to interview Sean Kammerer**. In his testimony before the P.C.R. judge, trial counsel admitted that he never tried to interview Kammerer to find out what he would say and that this failure fell below the standard of care to neglect to interview such an important witness:

Q. And, what did you do to investigate the charges and any defenses?

A. Well, I went and looked at all the discovery material. I looked at all the statements. I spoke with my client. What I did not do, which I should have done, was I should have gone up and talked to Sean Kaminer [*sic.*] in prison.

Q. And why did you not do that?

A. The trial came up. I figured the government; the state was going to bring him to trial. I kind of was counting on that. I told my client that. We showed up for trial, he wasn't there, and I can just tell you right now that after the trial was over I realized that I should have gone to see him in jail. I should have found out what he was going to say, and I should have brought him down there.

Appendix pages 94-95

The Court of Appeals recently held that the failure to interview a crucial alibi witness is precisely the kind of deficient conduct that falls below the minimum standard of effectiveness as guaranteed by the VI Amendment right to counsel:

We agree with the PCR court's finding that trial counsel's failure to investigate Reed as an alibi witness was deficient performance. Counsel admits she watched the DVD of Walker's interview. Therefore, she was aware of Walker's claim that he was with Reed on the night of the crime. "[C]riminal defense attorneys have a duty to undertake a reasonable investigation, which at a minimum includes interviewing potential witnesses and making an independent investigation of the facts and circumstances of

the case.” *Edwards*, 392 S.C. at 456, 710 S.E.2d at 64. The duty to investigate a potential witness is even more critical when the witness might provide an alibi. Accordingly, the Sixth Amendment requires that criminal defense attorneys thoroughly investigate potential alibi witnesses.

Trial counsel did nothing personally to investigate Reed as a witness. Her claim that her investigator was exploring Reed’s role in the case also does not satisfy her obligations under the Sixth Amendment. The duty to represent the client belongs to the lawyer. While it may be reasonable to allow investigators and paralegals to do some or all of the investigatory work, trial counsel has a duty to supervise the investigation, make sure it is completed, and familiarize herself with the results. Trial counsel’s failure to adequately investigate Reed as an alibi witness under the circumstances presented in this case was unreasonable under prevailing professional norms, and therefore deficient performance under the Sixth Amendment.

Walker v. State, 397 S.C. 226, 723 S.E.2d 610 (Ct. App. 2012)

By contrast, Tiffany Sanders’ P.C.R. counsel **did** attempt to interview Sean Kammerer in June of 2011, but of course, by then he was a year in to a 30-year sentence on his murder conviction. At the interview, Sean Kammerer was clear that he did not have a lawyer and was not talking until he got one. Petitioner’s P.C.R. counsel wrote one letter to Kammerer on July 1, 2011, and then a second one on August 3, 2011, (copies attached hereto) requesting a follow up visit:

July 1, 2011

At our last visit you indicated that you were going to obtain new counsel in assisting you to file a PCR. I was wondering if that had been accomplished, and if so, who your new lawyer was.

When you get this letter, please contact either by letter, or you can call me collect to indicate whether or not I could come visit you again.

/s/ Dale T. Cobb, Jr.

August 3, 2011

... could you please let me know who your new lawyer is?

We have filed our PCR for Tiffany Sanders, and I was wondering if I might return to Lee Correctional to discuss the other information you said you had that might gain Ms. Sanders a new trial.

When you get this letter, please contact me by letter, or you may call me collect to indicate if you would be amenable to letting me come speak with you again.

/s/ Dale T. Cobb, Jr.

This difference is crucial and demonstrates how Petitioner's trial counsel's failure prejudiced her: Trial counsel did not attempt to talk to Kammerer; P.C.R. counsel tried and failed. The longer Kammerer gets into a 30-year sentence, the less likely he is to assist anyone about anything. DeJuan Jenkins who drove Kammerer to the scene, waited with him for the victim, and then drove Kammerer away from the murder got 13 **months** in a youthful offender's facility. The disparity of these sentences surely burns in Sean Kammerer's consciousness. Thus, the issue of having Sean Kammerer testify at the P.C.R. hearing becomes more and more irrelevant as more and more time passes because the point is not what he would have said at the P.C.R. hearing, but rather that Petitioner's trial counsel never made the effort in 2010, before Kammerer was feeling the full weight of a 30-year sentence, and thereby forfeited an opportunity to get truthful information from him. Such an opportunity is now probably forever lost, a critical—and prejudicial—blow to making an informed decision about Tiffany Sanders' defense in 2010. Thus, it is in the State's strategic interest in preserving an unjust sentence to shift the inquiry to P.C.R. counsel's failure to call Sean Kammerer as a P.C.R. witness because in doing so, it diverts the Court's attention from what is an established fact—that Kammerer was there in May 2012, and physically available, but would not talk to P.C.R. counsel. The P.C.R. roster proves only that he was there at the

same time as Tiffany Sanders, a fact of which the Court can take judicial knowledge. (See *South Carolina Rules of Evidence*, Rule 201, “Judicial Notice of Adjudicative Facts”: “A judicially noticed fact must be one not subject to reasonable dispute in that it is either (1) generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.” A court roster meets both of these tests. Of course, P.C.R. counsel explained why he could not call Sean Kammerer to the P.C.R. judge as may be seen on page 88 of the Appendix:

MS. ELLIOTT: Your Honor, I object. This is going to be based on hearsay. He’s [Kammerer] not here. He could have been brought into court to testify. We do not have the opportunity to cross-examine him and tremendously object to anything related to Mr. Kaminer [sic.] from this witness.

MR. COBB: Well, unfortunately, your Honor, he is pending a post-conviction relief, and is waiting to have counsel appointed and obviously could not be summons [sic.] as a witness.

(Appendix, Vol. I, page 88)

The fact is that Sean Kammerer is scheduled to spend most of the rest of life in prison for shooting an unarmed acquaintance to death. What he will or will not say now probably deteriorates each minute as a result of his being confined to prison for at least 25.5 years.² The point is that the Petitioner’s trial counsel missed a crucial opportunity,

² “... I could be bounded in a nutshell, and count myself a king of infinite space—were it not that I have bad dreams. *Hamlet*, Act II, Sc. ii, line 254.

which is now forever lost, and such a failure is the quintessential failure to provide effective assistance of counsel. See *Walker v. State*, 397 S.C. 226, 723 S.E.2d 610 (Ct. App. 2012, quoted above on pps. 3-4). This Court recently repeated the constitutional requirement for effective assistance of counsel as:

"A defendant has the right to the effective assistance of counsel under the Sixth Amendment to the United States Constitution." *Lomax*, 379 S.C. at 100, 665 S.E.2d at 167, citing *Strickland v. Washington*, 466 U.S. 668, 684 (1984)). *Jordan v. State*, ____ S.C. ____, ____ S.E.2d ____ (2013) (Opinion No. 27337, filed December 11, 2013)

By any standard of effectiveness, the Petitioner's trial counsel failed in not making an effort to interview Kammerer prior to the time of trial and prior to Kammerer feeling the bounds of his confinement.

The State contends it is improper to prove Sean Kammerer's **legal** unavailability at the P.C.R. hearing by including the record a copy of the May, 2012, P.C.R. roster as a supplement to the Appendix even though the Court's rosters are facts about which the Court can take judicial knowledge. The roster proves that he was **physically** available, but counsel's statement to the Court on page 88 in combination with the court Orders attached to the State's motion and the two letters attached here show that he was **legally** unavailable. The State has undoubtedly waived any objection to supplementing the record by inclusion of the P.C.R. roster by presenting to this Court more compelling evidence of the same fact by filing of Judge Mullen's November 19, 2012, Order. This document is more compelling evidence than the docket sheet of the same fact of Kammerer's legal unavailability that Petitioner asserts through the docket sheet for the

May, 2012, P.C.R. term.³ Judge Mullen's November, 2012, Order granted Sean Kammerer's application for substitution of counsel and continued the case to May 20, 2013. This confirms that when Petitioner's P.C.R. counsel attempted to interview Kammerer in June 2011, he **refused** to talk on the ground that he was still awaiting appointment of counsel. (See P.C.R. counsel's correspondence to Kammerer dated July 1, 2011, and August 3, 2011, trying to get him to agree to talk—attached hereto. As the State points out through its attachments, the Clerk of Court appointed Scott McNeish to represent Kammerer on December 4, 2012, but when Petitioner's current counsel interviewed him at Leesville Correctional Institute in June 2011, he claimed he did not have a lawyer and refused to talk as set forth in the two letters attached here.)

The important point, lost in the current disagreement, is that P.C.R. counsel made a diligent attempt to interview the witness to determine what he would say. It is not disputed that trial counsel never made any effort to interview Kammerer in the crucial window of time before the State tried Tiffany Sanders. No matter how the State parses the duty imposed upon a defense counsel, any standard of effective representation includes interviewing the material witnesses. What is important in this case is that Tiffany Sanders is serving a 30-year sentence for murder, the same sentence imposed upon the murderer who laid in wait for the victim with a loaded pistol. Even Kammerer's constant companion during the day of the murder, DeJuan Jenkins, who drove the getaway vehicle, testified he knew nothing about a gun. Jenkins received a 13-month youthful offenders sentence, and it is impossible to look at this

³ The State also criticizes Petitioner for overstating her case by saying Petitioner and Kammerer were in court on the same "day." The State is correct that Kammerer was scheduled for Monday and the Petitioner Thursday. Thus, Petitioner should have said same "term" instead of same "day." See docket sheet attached to Petitioner's original motion to supplement the record. An extra copy is attached here to relieve the reader of having to retrieve it.

record and fail to appreciate just how little of a defense Tiffany Sanders received. The eyewitness to the shooting, who is now a North Charleston Police Officer, testified that there were two persons present with the victim at the time of the murder: DeJuan Jenkins and Sean Kammerer. Not one witness offered even a hint of evidence that Tiffany Sanders knew Sean Kammerer was lying in wait with a loaded handgun, yet she is currently serving a 30-year sentence for murder. The trial record demonstrates that her counsel offered nothing in the way of defense other than cursory cross examination, even declining to examine Jessica Hans. The result in the case is nothing short of astonishing and unjust, and had someone provided Tiffany Sanders any defense, she would not have been convicted of murder as a principal when there is no evidence in the record to support a verdict. Tiffany received a 30-year sentence when DeJuan Jenkins who drove the murderer to and from the scene received a 13-month sentence is the stuff of fiction. Thus, the issue should be whether Tiffany Sanders did or did not receive effective counsel, and the Court has been liberal in this case and others to insure that its review of an unjust conviction is thorough and fair. The rules⁴ governing the conduct of lawyers place "special responsibilities" on prosecutors in recognition of the fact that criminal prosecutions are different from ordinary cases. Citation to the rule does not imply a violation by the Solicitor or the Attorney General. Petitioner cites the rule solely to demonstrate that criminal prosecutions require additional protections for the accused, and the State should not object to the Court having the May 2012, P.C.R. roster before it to demonstrate Sean Kammerer was physically present.

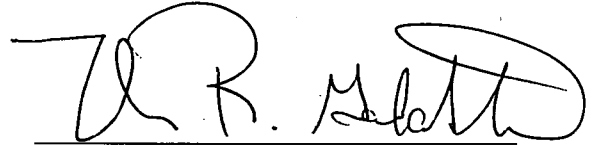
⁴ Rule 407 *South Carolina Appellate Court Rules*, Rule 3.8 "Special Responsibilities of a Prosecutor."

Conclusion

In conclusion, the purpose of supplementing the record is to demonstrate that Sean Kammerer was available physically at the May, 2012, P.C.R. term of court, but Kammerer rebuffed Petitioner's P.C.R. lawyer's efforts to interview him, a point highlighted by the Orders the Attorney General attaches to her Motion to Strike. The issue raised by the current petition is that Petitioner's trial counsel made no effort to interview perhaps the most critical witness in the entire case, which alone rises to the level of ineffective assistance of counsel. However, when the Court views this omission as a piece of a puzzle that also includes failing to call an eyewitness who was in the courtroom, Amanda Fender, who could prove Petitioner was not at the scene at the time of the murder and failing to ask a single question of the eyewitness, Jessica Hans, to reinforce the undisputed fact that at the time of the shooting, Tiffany Sanders, was not present, the evidence of ineffective assistance is overwhelming. It is astonishing that the trial judge did not direct a verdict on the murder charge, but that issue is before the court in the direct appeal. The State's present motion arises only because the Petitioner sought nothing more than to present the roster of cases for the May 2012 P.C.R. term to demonstrate that Sean Kammerer was physically present as additional support for the proposition that his value to the Petitioner was sacrificed by her trial counsel's inattentiveness to preparation of the case. Therefore, the State's motion should be denied.

Respectfully submitted,

January 30, 2014

A handwritten signature in black ink, appearing to read "Dale T. Cobb, Jr. and Thomas R. Goldstein". The signature is written in a cursive style with large, sweeping letters.

Dale T. Cobb, Jr., #
Thomas R. Goldstein, #2186
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dtcobb@hotmail.com
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POST-CONVICTION RELIEF HEARINGS
 FIRST JUDICIAL CIRCUIT
 HONORABLE DEANDREA G. BENJAMIN, JUDGE
ORANGEBURG COUNTY COURTHOUSE

Updated May 1, 2012

MONDAY, MAY 21, 2012

TIME	APPLICANT'S NAME	COUNTY/ DOCKET NUMBER	ATTORNEY REPRESENTING APPLICANT	ATTORNEY REPRESENTING STATE	WITNESS
9:30	Sean Kammerer 326986	Dorchester 2009-CP-18-0203	Barbara Stroud	David Spencer	Nicholas Clekis Guy Viterra
9:30	Dennis Jamroz Not Incarcerated	Dorchester 2009-CP-18-0466	Lawrence Kasen	David Spencer	Ken Cooper
9:30	William Cokely 276038	Dorchester 2009-CP-18-1339	Carl Grant	David Spencer	
9:30	Anwan Garrett 333338	Dorchester 2010-CP-18-0603	Christopher Skipper	David Spencer	Mark Peper
9:30	Jonathan Lisle 309262	Dorchester 2010-CP-18-0837	Ashley Ameika	David Spencer	Mark Redmond
9:30	Johnny White 243047	Orangeburg 2010-CP-38-0086	Thomas Sims	David Spencer	Jillian Ullman
9:30	Ken Lucero Not Incarcerated	Dorchester 2011-CP-18-0778	Eleanor Duffy Cleary	David Spencer	Marva Hardee-Thomas
9:30	Jonathan James 185547	Orangeburg 2011-CP-38-0487	Jeremy Thompson	David Spencer	Michael Culler
9:30	Lavon Mintz 303362	Orangeburg 2010-CP-38-1698	Jeremy Thompson	David Spencer	
9:30	Cedric Kearse 330288	Orangeburg 2011-CP-38-0058	Nicole Singletary	David Spencer	Margaret Hinds
9:30	Phillip Spears 297965	Galthoun 2011-CP-09-0197	Nicole Singletary	David Spencer	Charlie J. Johnson

POST-CONVICTION RELIEF HEARINGS
 FIRST JUDICIAL CIRCUIT
 HONORABLE DEANDREA G. BENJAMIN, JUDGE
ORANGEBURG COUNTY COURTHOUSE

Updated May 1, 2012

TUESDAY, MAY 22, 2012

TIME	APPLICANT'S NAME	COUNTY/ DOCKET NUMBER	ATTORNEY REPRESENTING APPLICANT	ATTORNEY REPRESENTING STATE	WITNESS
9:30	Jimmy Taylor 321636	Orangenburg 2011-CP-38-0766	W. Scott Palmer	David Spencer	Everett Chandler
9:30	Patrick Spigner 340898	Orangenburg 2010-CP-38-1611	W. Scott Palmer	David Spencer	Sara Ford
9:30	Bryan Mulligan 344736	Dorchester 2011-CP-18-1416	Tara Shurling	David Spencer	Andrew Savage, III
9:30	Norma Hall 283470	Dorchester 2011-CP-18-0533	Tara Shurling	David Spencer	Laura Knobloch
9:30	Willie Pelzer 338263	Calhoun 2010-CP-09-0189	Tara Shurling	David Spencer	Mark Leidecker
9:30	Delronezy Washington 337975	Dorchester 2010-CP-18-1718	Christopher Lizzi	David Spencer	Mark Leidecker Walter Bailey
9:30	Anthony Sanders 339645	Dorchester 2011-CP-18-0027	Jessica Cassick	David Spencer	Mark Leidecker Mitch Farley
9:30	Conrad Lirtle 341316	Dorchester 2011-CP-18-1610	Jason Green	David Spencer	Steve Davis
9:30	Lindy Jones 335250	Orangenburg 2011-CP-38-1240	C. Bradley Hutto MOVED FROM FRIDAY	David Spencer	Doug Mellard Sara Ford
9:30	Anthony Britt 317524	Orangenburg 2010-CP-38-1105	Victor Li MOVED FROM FRIDAY	David Spencer	C. Bradley Hutto
9:30	Cecil Jamison 277460	Orangenburg 2011-CP-38-0847	David R. Williams MOVED FROM FRIDAY	David Spencer	Mark Wise

POST-CONVICTION RELIEF HEARINGS
 FIRST JUDICIAL CIRCUIT
 HONORABLE DEANDREA G. BENJAMIN, JUDGE
 ORANGEBURG COUNTY COURTHOUSE

Updated May 1, 2012

WEDNESDAY, MAY 23, 2012

TIME	APPLICANT'S NAME	COUNTY/ DOCKET NUMBER	ATTORNEY REPRESENTING APPLICANT	ATTORNEY REPRESENTING STATE	WITNESS
9:30	Willie Bell 254817	Orangeburg 2009-CP-38-1261	Robert E. Hood	Tyson Andrew Johnson, Sr.	Margaret Hinds Doug Mellard
9:30	Christopher Aiken 258795	Orangeburg 2009-CP-38-1480	Joshua Koger	Tyson Andrew Johnson, Sr.	Jillan Ullman
9:30	Justin Kennerlin 338563	Orangeburg 2010-CP-38-1371	Robert E. Hood	Tyson Andrew Johnson, Sr.	Doug Mellard
9:30	Antonio Hair 248402	Orangeburg 2011-CP-38-0059	Robert E. Hood	Tyson Andrew Johnson, Sr.	Doug Mellard
9:30	Mark Zachary 281890	Orangeburg 2011-CP-38-0662	Robert E. Hood	Tyson Andrew Johnson, Sr.	Jillan Ullman Ashley Chisholm
9:30	Dwayne Sumpter 342439	Orangeburg 2011-CP-38-0269	James Jackson	Tyson Andrew Johnson, Sr.	Ashley Chisholm
9:30	DeAndre Sumpter 342438	Orangeburg 2011-CP-38-0125	Earnest Deon O'Neil	Tyson Andrew Johnson, Sr.	Margaret Hinds
9:30	Donald Miles 313832	Orangeburg 2009-CP-38-1698	Andrew J. Brown	Tyson Andrew Johnson, Sr.	Virgin Johnson Glenn Walters
9:30	Donald Lee 156514	Orangeburg 2010-CP-38-0431	Russell Blanchard MOVED FROM FRIDAY	Tyson Andrew Johnson, Sr.	Larry Knox
9:30	John Stanford Johnson 250659	Orangeburg 2011-CP-38-1239	Michael Culler MOVED FROM FRIDAY	Tyson Andrew Johnson, Sr.	Melissa Gay Charles Williams

POST-CONVICTION RELIEF HEARINGS
 FIRST JUDICIAL CIRCUIT
 HONORABLE DEANDREA G. BENJAMIN, JUDGE
 ORANGEBURG COUNTY COURTHOUSE

Updated May 1, 2012

THURSDAY, MAY 24, 2012

TIME	APPLICANT'S NAME	COUNTY/ DOCKET NUMBER	ATTORNEY REPRESENTING APPLICANT	ATTORNEY REPRESENTING STATE	WITNESS
9:30	Steven Briscoe 312254	Dorchester 2009-CP-18-0305	Charles T. Brooks, III	Salley Elliott	Kevin Kenrose
9:30	John Drayton 137499	Orangeburg 2010-CP-38-0632	Charles T. Brooks, III	Salley Elliott	Doug Mellard
9:30	James West 339200	Dorchester 2010-CP-18-2806	Charles T. Brooks, III	Salley Elliott	J. Scott Bischoff John Loy
9:30	Eric Eugene Mizze Not Incarcerated	Dorchester 2010-CP-18-2944	Henry Fulmer, III	Salley Elliott	George Gartounis
9:30	Tomnie Moore 136242	Dorchester 2011-CP-18-0641	Frederick Newton	Salley Elliott	J. Scott Bischoff
9:30	Kenneth Noble 161103	Dorchester 2011-CP-18-0779	Roger Dixon	Salley Elliott	J. Joseph Condon, Jr.
9:30	Tiffany Sanders 342130	Dorchester 2011-CP-18-1497	Dale T. Cobb, Jr.	Salley Elliott	Michael S. O'Neal
9:30	Abdullah Holmes 345105	Dorchester 2011-CP-18-1565	William B. Jung	Salley Elliott	Mary LeMarty
9:30	Harold Williams 343369	Dorchester 2011-CP-18-1609	Charles T. Brooks, III	Salley Elliott	Katherine Dahlheim
9:30	Gregory Taft Bennett Not Incarcerated	Dorchester 2009-CP-18-2309	Scott McNeish	Salley Elliott	Katherine Dahlheim

August 3, 2011

LEGAL MAIL

Sean Kammerer
SCDC# 002396986
Lee Correctional Institution
1204 East Church St.
Bishopville, SC 29010

RECEIVED

AUG 3 2011

TRUOD BUREAU

Dear Mr. Kammerer,

At our last visit, you indicated that you were applying for a change of counsel, and I was wondering if you had accomplished that. If so, could you please let me know who your new lawyer is?

We have filed our PCR for Tiffany Sanders, and I was wondering if I might return to Lee Correctional to discuss the other information you said you had that might gain Ms. Sanders a new trial.

When you get this letter, please contact me by letter, or you may call me collect to indicate if you would be amenable to letting me come speak with you again.

Sincerely,

Dale T. Cobb, Jr.
Attorney for Tiffany Sanders

RECEIVED

FEB 03 2014

S.C. SUPREME COURT

July 1, 2011

LEGAL MAIL

Sean Kammerer
SCDC # 003296986
Lee Correctional Institution
1204 East Church St
Bishopville, SC 29010

Dear Mr. Kammerer,

At our last visit you indicated that you were going to obtain new counsel in assisting you to file a PCR. I was wondering if that had been accomplished, and if so, who your new lawyer was.

We will be filing a PCR for Ms. Sanders shortly and I was wondering if I could come back to visit you about the other information you indicated that you had that might help Ms. Sanders in her bid for a new trial.

When you get this letter, please contact either by letter, or you can call me collect to indicate whether or not I could come visit you again.

Sincerely,,

Dale T. Cobb, Jr
Attorney for Tiffany Sanders