

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

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Case No.: 2011GS4206214-5

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The State ..... Respondent.  
vs.  
Samuel Owens..... Appellant.

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**MOTION TO BE RELIEVED AS COUNSEL**

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YOU WILL PLEASE TAKE NOTICE, that Appellant's counsel, John G. Reckenbeil, will move to be relieved as counsel on the tenth (10) day following service hereof or soon thereafter as counsel may be heard. You will please take notice that John G. Reckenbeil moves before this honorable court for an Order to be relieved as counsel on behalf of Samuel Owens. This motion is based upon Mr. Owens is indigent and cannot afford the legal fees for the appeal. (The Affidavit of Indigency has been sent to Appellant for completion).

RESPECTFULLY SUBMITTED:

*John G. Reckenbeil*

John G. Reckenbeil, Esq.  
Post Office Box 1633  
Spartanburg, SC 29304-1633  
(864) 582-5472  
Fax (864) 582-7280  
[john@johnreckenbeillaw.com](mailto:john@johnreckenbeillaw.com)

Dated: January 2, 2014  
Spartanburg, SC

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FEB 21 2014  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

Appellate Case No.: 2014-000039

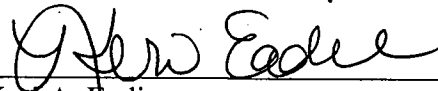
The State ..... Respondent.  
vs.  
Samuel Owens ..... Appellant.

**CERTIFICATE OF SERVICE**

I, Keri A. Eadie, the undersigned paralegal to John G. Reckenbeil, certify that I have mailed a copy of the herein below listed pleading to the person in this matter, on this 14<sup>th</sup> day of February 2014, as follows:

**PLEADINGS:**                      **Motion to be Relieved as Counsel**

**PERSON SERVED:**              **Samuel Owens, SCDC #00358263**  
**Kirkland Reception and Evaluation Center F3-B151**  
**4344 Broad River Road**  
**Columbia, SC 29210**



Keri A. Eadie  
Paralegal to John G. Reckenbeil, Esq.  
P.O. Box 1633  
Spartanburg, SC 29304  
(864) 582-5472  
Fax (864) 582-7280

Dated: February 14, 2014  
Spartanburg, South Carolina

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John G. Reckenbeil  
john@johnreckenbeillaw.com

# Law Office of John G. Reckenbeil

Lawrence E. McNair, III  
lee@johnreckenbeillaw.com

February 14, 2014

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

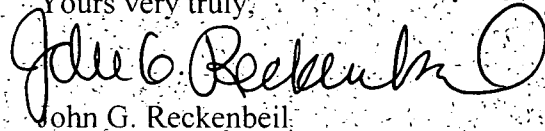
**RE: The State vs. Samuel Owens  
Appellate Case No.: 2014-000039**

Dear Clerk of Court:

You will find enclosed a copy of the letter and motion to be relieved as counsel that my office mailed to Mr. Owens along with a certificate of service for the same.

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

Yours very truly,



John G. Reckenbeil

JGR/kae

Enclosure

CC: Salley W. Elliot, Esquire

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SC Court of Appeals

215 Magnolia St. • PO Box 1633 • Spartanburg, SC 29304

Phone: (864) 582-5472 • Fax: (864) 582-7280

Keri A. Eadie, Legal Assistant

keri@johnreckenbeillaw.com

February 14, 2014

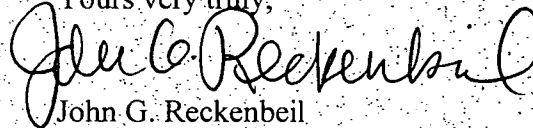
Samuel Owens, SCDC #00358263  
Kirkland Reception and Evaluation Center F3-B151  
4344 Broad River Road  
Columbia, SC 29210

**RE: State v. Samuel Owens**  
**Appellate Case No.: 2014-000039**

Dear Sam:

You will find enclosed a copy of the Motion to be Relieved as Counsel that my office filed with the South Carolina Court of Appeals in regards to the above referenced case along with a Certificate of Service for the same.

Yours very truly,



John G. Reckenbeil

JGR/kae

Enclosure

CC: Jenny Abbott Kitchings, Clerk of Court ✓  
S.C. Court of Appeals

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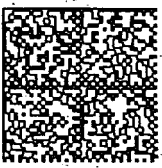
FEB 21 2014


**SC Court of Appeals**

*Law Office of*  
**John G. Redkenbell**

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PO Box 1633  
Spartanburg, SC 29304

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Clerk of Court  
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