

EMILY B. HOWARD
Attorney at Law
A REGISTERED LIMITED LIABILITY COMPANY

203 WEST MAIN STREET, SUITE F-2
LEXINGTON, SOUTH CAROLINA 29072

TELEPHONE: 803.957.5200
FACSIMILE: 803.957.5201
Emily@EBHowardlaw.com

June 18, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court for Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

JUN 20 2014

SC Court of Appeals

Re: The State vs. Margaret Marie Driggers
Appellate Case No. 2014-001050

Dear Ms. Kitchings:

Per the request of the Court, I have forwarded my explanation for appealing to Ms. Driggers along with the requested statement informing her of the Court's address and the requirement that she inform the Court in writing of any arguable basis that there are issues preserved for appeal within twenty (20) days from the transmittal of my letter.

Please find enclosed a copy of the original explanation submitted to the Court in May along with an updated version with the correct caption and the case number.

I am, by copy of this letter, serving a copy of this appeal explanation and the corresponding letter on David Shawn Graham, Robert M. Dudek, and Sally W. Elliott together with my Certificate of Service.

Thank you for your assistance in this matter. With kind regards, I am

Sincerely,



Emily B. Howard, Attorney for Defendant
SC Bar No. 74981
203 West Main St., Suite F-2
Lexington, SC 29072
Telephone: 803.957.5200
Facsimile: 803.957.5201
emily@ebhowardlaw.com

ENC

CC: David Shawn Graham, Deputy Solicitor
Lexington County Solicitor's Office
205 E. Main Street
Lexington, SC 29072

Robert M. Dudek, Esquire
Chief Appellate Defender
P.O. Box 11433
Columbia, SC 29211

Salley W. Elliott, Esquire
Senior Assistant Deputy Attorney General
P.O. Box 11549
Columbia, SC 29211

Margaret Marie Driggers
SCDC ID: 00359524
Graham Correctional Institution
4450 Broad River Road
Columbia, SC 29210

The Law Office of
EMILY B. HOWARD
Attorney at Law
A REGISTERED LIMITED LIABILITY COMPANY

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June 18, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

HONORABLE Thomas A. Russo, CIRCUIT COURT JUDGE

Appellate Case No. 2014-001050

The State,.....Respondent.
V.
Margaret Marie Driggers.....Appellant.

PROOF OF SERVICE

I certify that I have served the Explanation for Appeal and corresponding letter
on the following:

David Shawn Graham, Deputy Solicitor
Lexington County Solicitor's Office
205 E. Main Street
Lexington, SC 29072

Robert M. Dudek, Esquire
Chief Appellate Defender

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JUN 20 2014


SC Court of Appeals

P.O. Box 11433
Columbia, SC 29211

Salley W. Elliott, Esquire
Senior Assistant Deputy Attorney General
P.O. Box 11549
Columbia, SC 29211

Margaret Marie Driggers
SCDC ID: 00359524
Graham Correctional Institution
4450 Broad River Road
Columbia, SC 29210

by depositing a copy of it in the United States Mail, postage prepaid, on June 18, 2014, addressed to each of the above-listed recipients at the corresponding addresses.



Emily B. Howard, Attorney for Defendant
203 West Main Street, Suite F-2
Lexington, South Carolina 29072
Telephone: 803.957.5200
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June 18th, 2014
Lexington, South Carolina

The Law Office of
EMILY B. HOWARD
Attorney at Law
A REGISTERED LIMITED LIABILITY COMPANY

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LEXINGTON, SOUTH CAROLINA 29072

TELEPHONE: 803.957.5200
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Emily@EBHowardlaw.com

June 18, 2014

Ms. Margaret Marie Driggers
SCDC ID: 00359524
Graham Correctional Institution
4450 Broad River Road
Columbia, SC 29210

RECEIVED

JUN 20 2014

SC Court of Appeals

RE: The State v. Margaret Marie Driggers
Appellate Case No. 2014-001050

Dear Ms. Driggers:

Enclosed you will find the explanation for your appeal that I sent to you and to the Court of Appeals when I originally filed your Notice of Appeal in May. I have enclosed both the original explanation and an updated version with the Appellate Court case number and heading.

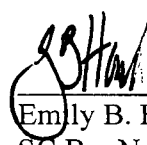
I need to inform you that you have twenty (20) days from the date of this letter to inform the Court of Appeals in writing of any arguable basis that there are issues preserved for appeal in your case.

This document should be sent to the Court at the following address:

South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Please remember to submit this document to the Court within twenty (20) days.

Sincerely,



Emily B. Howard, Attorney for Defendant
SC Bar Number: 74981
203 West Main Street, Suite F-2
Lexington, SC 29072
Telephone: 803.957.5200
Facsimile: 803.957.5201
emily@ebhowardlaw.com

cc: Jenny Abbott Kitchings, Clerk of Court
Salley W. Elliott, Esquire
Robert Michael Dudek, Esquire
David Shawn Graham, Esquire

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

HONRABLE Thomas A. Russo, CIRCUIT COURT JUDGE

Appellate Case No. 2014-001050

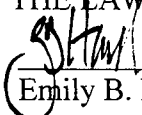
The State, Respondent,
V.
Margaret Marie Driggers, Appellant.

RULE 203(B) EXPLANATION

Pursuant to Rule 203(B)(iv), the undersigned asserts that she does not have a good faith basis to believe that any issues are properly before the Court of Appeals, and the undersigned did file a motion to reconsider the sentence which was heard and denied on May 6, 2014. Nevertheless, the undersigned consulted with the Appellant about her right to appeal, and after consultation, the undersigned has filed the instant appeal at the request of the Appellant because the Sixth Amendment requires counsel to follow the Appellant's request. *See Frazer v. South Carolina*, 430 F.3d 696, 706 (4th Cir. 2005) ("A defendant has a right to pursue a direct appeal, even if frivolous, which counsel must assist as 'an active advocate on behalf of his client.'") (quoting *Anders v. California*, 386 U.S. 738, 744 (1967)).

Respectfully submitted,

THE LAW OFFICE OF EMILY B. HOWARD, LLC



Emily B. Howard, Attorney for Defendant

S.C. Bar Number 74981
203 West Main Street, Suite F-2
Lexington, South Carolina 29072
Telephone: 803.957.5200

June 19, 2014
Lexington, South Carolina

STATE OF SOUTH CAROLINA

vs.

Margaret Marie Driggers,

Defendant.

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

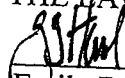
Indictment Nos.: 2014-GS-32-00897
2014-GS-32-00898
2014-GS-32-00899

RULE 203(B) EXPLANATION

Pursuant to Rule 203(B)(iv), the undersigned asserts that she does not have a good faith basis to believe that any issues are properly before the Court of Appeals, and the undersigned did file a motion to reconsider the sentence which was heard and denied on May 6, 2014. Nevertheless, the undersigned consulted with the Appellant about her right to appeal, and after consultation, the undersigned has filed the instant appeal at the request of the Appellant because the Sixth Amendment requires counsel to follow the Appellant's request. *See Frazer v. South Carolina*, 430 F.3d 696, 706 (4th Cir. 2005) ("A defendant has a right to pursue a direct appeal, even if frivolous, which counsel must assist as 'an active advocate on behalf of his client.'" (quoting *Anders v. California*, 386 U.S. 738, 744 (1967))).

Respectfully submitted,

THE LAW OFFICE OF EMILY B. HOWARD, LLC



Emily B. Howard, Attorney for Defendant
S.C. Bar Number 74981
203 West Main Street, Suite F-2
Lexington, South Carolina 29072
Telephone: 803.957.5200

May 14, 2014
Lexington, South Carolina

EMILY B. HOWARD
Attorney at Law
A REGISTERED LIMITED LIABILITY COMPANY

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LEXINGTON, SOUTH CAROLINA 29072

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May 14, 2014

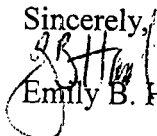
Margaret Marie Driggers SCDC ID: 359524
Graham Correctional Institution
4450 Broad River Road
Columbia, SC 29210

Dear Margaret:

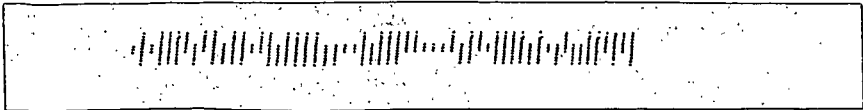
I am required to provide you with a copy of my filing under Rule 203(B) indicating that I am not aware of an arguable basis for your appeal. Please note, you have twenty (20) days from the transmittal of the enclosed in which to provide the Court of Appeals an arguable basis for your appeal. The Court's address is:

South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

With my warm personal regards, I remain,

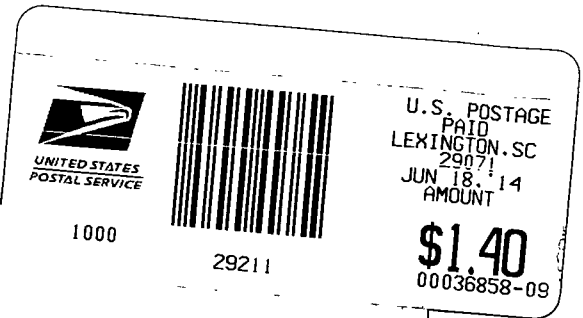
Sincerely,

Emily B. Howard

Enclosures
cc: Court of Appeals



Law Office of Emily B. Howard, LLC
203 West Main Street, Suite F-2
Lexington, South Carolina 29072

The Honorable Jenny Abbott Kitchings
Clerk of Court for Court of Appeals
P.O. Box 11629
Columbia, SC 29211



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JUN 20 2014
SC Court of Appeals