

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of General Sessions

Honorable D. Craig Brown, Circuit Court Judge

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SC Court of Appeals

The State of South Carolina,)
Respondent,)

Case No. 2012-GS-21-1483

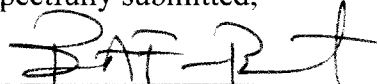
vs.)

WILLIAM JAMELL THOMAS,)
Appellant.)

**REPLY TO AG'S RESPONSE TO APPELLANT'S
MOTION TO CERTIFY APPELLANT'S CASE FOR
REVIEW BY THE SOUTH CAROLINA SUPREME COURT**

The Attorney General, while conceding that the issue in this case is "significant," nevertheless asks this Court to deny Appellant's motion because, it contends, the issue is not preserved. While it is true that no party specifically objected to the jury instruction, trial counsel did make a motion for a directed verdict at the appropriate time, and argued that the State did not provide sufficient evidence to convict the Appellant of attempted murder. Appellant contends this is sufficient for Court to address this issue.

Respectfully submitted,



ELIZABETH A. FRANKLIN-BEST, #72555

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cc: Christina Catoe

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of General Sessions

The Honorable D. Craig Brown, Circuit Court Judge

Trial Court Case No. 2012GS2101483

William Jamell Thomas, Jr.

Appellant,

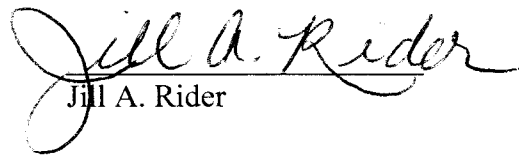
The State of South Carolina

Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Appellant's Reply to Appellant's Motion to Certify Appellant's Case for Review by the South Carolina Supreme Court was served by first class United States mail, postage prepaid, this 7th day of July, 2014, upon the following:

Christina Catoe
Assistant Attorney General
P.O. Box 11549
Columbia, SC 29211


Jill A. Rider

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BLUME NORRIS & FRANKLIN-BEST, LLC

ATTORNEYS AT LAW

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SC Court of Appeals

July 7, 2014

The Honorable Daniel E. Shearouse
Clerk
South Carolina Supreme Court
P.O. Box 11330
Columbia, S.C. 29211

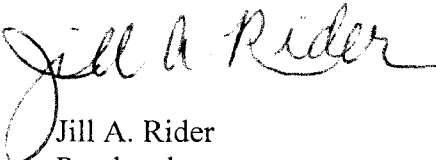
RE: *State v. William Jamell Thomas*

Dear Mr. Shearouse:

Please find enclosed for filing, along with certificate of service, the original and seven copies of Appellant's Reply to AG's Response to Appellant's Motion to Certify Appellant's Case for Review by the South Carolina Supreme Court. If you could please clock in the extra copy and return it to me in the enclosed self-addressed stamped envelope.

If you should have any questions, please do not hesitate to contact our office.

Sincerely,


Jill A. Rider
Paralegal

Enclosure

cc: Christina Catoe, Esq.
Jenny Kitchings, Clerk

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SC Court of Appeals

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