

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

172702

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early III, Circuit Court Judge

**RECEIVED**

JUL 03 2014

**SC Court of Appeals**

Appellate Case No. 2014-000258

The State of South Carolina,.....Respondent,  
v.  
Willie H. Council; Tommy Parrish Representing Metro Bail Bonds, Surety; and Lexon  
Insurance Company, Defendants,  
Of whom Metro Bail Bonds is,.....Appellant.

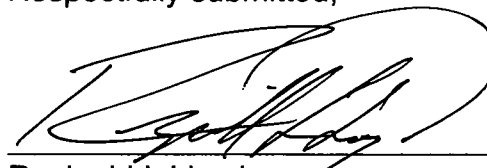
PETITION FOR REINSTATEMENT OF APPEAL AND NOTICE OF ATTORNEY  
APPEARANCE

On or before April 7, 2014, Mr. Joseph Lowe filed a Notice of Appeal in the above-captioned matter, on behalf of Metro Bail Bonds, LLC. On April 7, 2014, the Clerk of Court for the South Carolina filed and mailed an Order advising Lowe that he must notify the Court, within ten days of that date, of the name of an attorney who would handle the appeal on behalf of Metro Bail Bonds. Lowe failed to file notice, with the Court, of an attorney representing Metro Bail Bonds, and, by Order dated June 18, 2014, the Court dismissed the appeal, pursuant to Renaissance Enters v. Summit Teleservices, Inc., 224 S.C. 649, 651, 515 S.E.2d 257, 258 (1999) (holding that a non-lawyer is prohibited from representing a corporate entity in the appellate courts).

Metro Bail Bonds is respectfully requesting reconsideration of the Order dismissing the appeal, in this matter, and is petitioning the Court for reinstatement of the appeal. Mr. Lowe was mistaken in his belief that, as owner of Metro Bail Bonds, he was representing "himself" in a *pro se* capacity. Mr. Lowe was also mistaken in believing that the manner in which Metro Bail Bonds is taxed also affected whether or not he could act in a *pro se* capacity in this matter.

Mr. Lowe now understands that he may not represent Metro Bail Bonds, as a corporate entity, even if he is the owner of that business. I am familiar with the issues Mr. Lowe wanted to appeal to this Court and am prepared to appear on behalf of Metro Bail Bonds in the event that the Court is gracious enough to reinstate this appeal.

Respectfully submitted,



Reginald I. Lloyd  
SCBar No. 065024  
715 West DeKalb Street  
Post Office Box 1555  
Columbia, South Carolina 29021  
(803) 432-0004  
(844) 270-4813

Attorney for Appellant

July 2, 2014

Other Counsel of Record:

Hon. James Strom Thurmond, Jr.  
Solicitor, Second Judicial Circuit  
109 Park Avenue, S.E.

P.O. Drawer 3368  
Aiken, South Carolina 29802  
(803) 642-1557

Attorney for Respondent.

THE STATE OF SOUTH CAROLINA  
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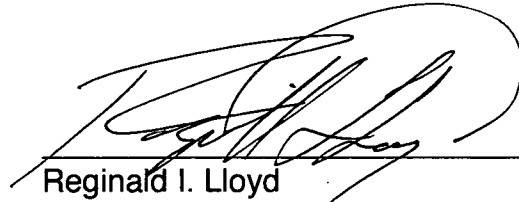
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PROOF OF SERVICE

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I certify that I have served the Petition for Reinstatement of Appeal and Notice of Attorney Appearance on the State of South Carolina by depositing a copy of the same in the United States Mail, postage prepaid, on July 2, 2014, addressed to the Hon. James Strom Thurmond, Jr., Second Judicial Circuit Solicitor, 109 Park Avenue, S.E., P.O. Drawer 3368, Aiken, South Carolina 29802.

July 2, 2014



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Attorney for Appellant

# THE LLOYD LAW FIRM, LLC

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803-432-0004 (p)  
844-270-4813 (f)

July 2, 2014

Hon. Jenny A. Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: State v. Willie H. Council, Appellate Case No. 2014-000258.

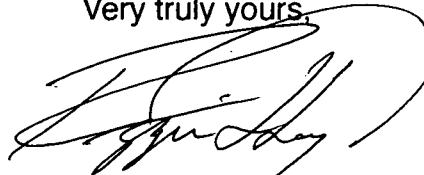
Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Appellant's Petition for Reinstatement of Appeal and Appearance of Counsel in the above referenced matter. Also enclosed please find a check in the amount of \$25.00 for the motion/petition filing fee. Please file the original and six (6) copies and return a clocked in copy to me in the enclosed stamped self addressed envelope.

If you should have any questions, please do not hesitate to call me.

With kind regards, I am

Very truly yours,



Reginald I. Lloyd

Enclosures