

STATE OF SOUTH CAROLINA  
In the Supreme Court

---

**RECEIVED**

AUG 22 2014

APPEAL FROM Horry COUNTY  
Court of General Sessions

**S.C. SUPREME COURT**

Steven H. John, Circuit Court Judge

---

Appellate Case No. 2012-212800  
Circuit Court Case No. 2006-GS-26-2998

---

STATE OF SOUTH CAROLINA,

RESPONDENT,

v.

LARRY CHESNUT,

APPELLANT.

---

**MOTION TO ARGUE AGAINST PRECEDENT**

---

NOW COMES the Appellant in the above-captioned action, acting by and through undersigned counsel, hereby respectfully requesting permission, pursuant to Rule 217, SCACR, to argue against precedent during oral argument. In support of this motion, the Appellant would show unto this Honorable Court the following:

This matter is scheduled for oral argument on September 24, 2014. In this appeal generally and in his Brief of Appellant specifically, the Appellant has challenged this Court's ruling in State v. Huckie, 22 S.C. 298 (1885), and has requested that this Court abandon Huckie's holding that all co-defendants lose the right to have the final closing argument in a joint trial when any co-defendant introduces evidence at that trial. The Appellant would respectfully

request that this Court permit him to argue that Huckie should be overturned during the oral argument that will be held in this matter on September 24, 2014. The Appellant would also request that he be permitted to make a similar argument regarding any case that has upheld or applied Huckie since Huckie was decided, including State v. Crowe, 258 S.C. 258, 188 S.E.2d 379 (1972). Finally, the Appellant has also argued that this Court's decision in State v. Sims, 16 S.C. 487 (1884), was wrongfully decided as well. Accordingly, the Appellant would request permission to argue against Sims and its progeny during oral argument.

WHEREFORE, having set forth his grounds, the Appellant respectfully requests that this Court permit him to argue against precedent before this Court on September 24, 2014.

Respectfully submitted,



---

**JEREMY A. THOMPSON**  
Attorney and Counselor at Law

Law Office of Jeremy A. Thompson, LLC  
P.O. Box 12891  
Columbia, SC 29211  
803-779-2555  
803-779-2556 FAX  
[jeremyatlaw@yahoo.com](mailto:jeremyatlaw@yahoo.com)

**ATTORNEY FOR APPELLANT.**

This 21<sup>st</sup> day of August, 2014.

STATE OF SOUTH CAROLINA  
In the Supreme Court

---

APPEAL FROM HORRY COUNTY  
Court of General Sessions

Steven H. John, Circuit Court Judge

---

Appellate Case No. 2012-212800  
Circuit Court Case No. 2006-GS-26-2998

---

STATE OF SOUTH CAROLINA,

RESPONDENT,

v.

LARRY CHESNUT,

APPELLANT.

---

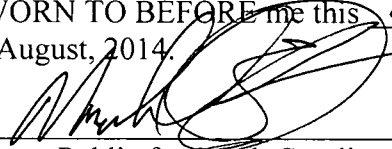
**CERTIFICATE OF SERVICE**

---

The undersigned hereby certifies that one copy of the Motion to Argue Against Precedent in the above-entitled case has been served upon opposing counsel, Deborah R.J. Shupe, Senior Assistant Deputy Attorney General, Office of the Attorney General, P.O. Box 11549, Columbia, SC 29211, by depositing in the U.S. mail with proper postage, this 21<sup>st</sup> day of August, 2014.

  
\_\_\_\_\_  
**JEREMY A. THOMPSON**  
ATTORNEY FOR THE APPELLANT

SWORN TO BEFORE me this 21<sup>st</sup> day  
of August, 2014.

  
\_\_\_\_\_  
(L.S.)  
Notary Public for South Carolina

My Commission Expires: 7/10/2022