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OCT 06 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT
APPEAL FROM ORANGEBURG COUNTY
HONORABLE MAITÉ MURPHY, CIRCUIT COURT JUDGE
CASE No. 2013-CP-38-00432

S.C. SUPREME COURT

JEFFREY GRIMES,

Petitioner,

vs.

THE STATE OF SOUTH CAROLINA,

Respondent.

PETITION FOR BAIL

This matter comes before the Supreme / Appellate Court by motion of Jeffrey N. Grimes, who moves the Court to admit Mr. Grimes bail, pending the outcome of the State / Petitioner's appeal, in accordance with Rule 243 (K) of S.C.A.C.R. . In support of his motion, Petitioner will show unto the Court:

- 1.) Mr. Grimes (P.C.R.) was heard on May 27, 2014, by the Honorable Maité Murphy, and was denied. The Petitioner has filed an appeal within the (30) days and is now submitting a petition for bail. In accordance with Rule 243 (K), a post-conviction relief applicant may be admitted to bail after the service of the notice of appeal, by either the applicant, or the State. The Applicant has appealed this order to the Supreme Court by Notice of Appeal, dated Sept. 18, 2014, a copy of which is attached thereof.

Applicant clearly understand that if the sentence originally imposed did not exceed imprisonment for ten (10) years the petition for bail shall be made to the lower court. In all other cases, the petition for bail shall be made to the Supreme Court. The petition and any return or reply shall comply with the requirements of Rule (240).

Applicant also clearly understands that whether to admit an applicant to bail, the following factors will be considered:

- 1.) the probability the applicant will prevail on appellate review and the nature of the relief he will receive;
- 2.) the seriousness of the criminal offense committed;
- 3.) the danger the applicant may pose to the community if he is released;
- 4.) the likelihood that the applicant may flee if released;
- 5.) the character and circumstances of the applicant.

Applicant also understands that if bail is granted, the court may require the posting of a bond, and impose other conditions. Also attached to this petition is a letter from a lifelong member of the community in which I would be residing in, if given the opportunity to bail pending appellate review. Thank you for your time and consideration on this petition.

Sincerely,

s. Jeffrey N. Grimes

JEFFREY N. GRIMES

Dr. Bassey A. Eyo
243 Whippoorwill Rd.NW,
Orangeburg, S. C. 29118

May 6, 2014

Lieber Correctional Institution
P.O.Box 205,
Wando Unit D-186
Ridgeville, S.C. 29472

To Whom It May Concern:

I am writing in support of Jeffrey Grimes, a current inmate at the correctional institution listed above. I am a neighbor of Mr. Calvin and Mrs. Onetha Grimes, the parents of Jeffrey. We have lived next door to each other for several decades, and know each other's families relatively well.

I have known Jeffrey since he was a very young child, when the family moved into the house next to ours. Jeffrey played and mingled well with the other children in the neighborhood, including my three daughters. Jeffrey was a good kid; and I watched him grow into a loving, respectful and admirable young man. Though I did not interact with him that often after he graduated from high school, I did see him from time to time when he visited his parents. I also had the opportunity to get to know a different aspect of him when he enrolled in a biology class that I taught at Claflin College (now Claflin University); and found him to be a good hard working student. Throughout the many years of knowing him, Jeffrey has always impressed me as a quiet, kind and well-mannered individual.

I was unbelievably shocked when his father told me that Jeffrey had shot someone. It was so out of character for the young man that I knew, that I did not want to believe him until Jeffrey's mother confirmed the information. It was and has been difficult to comprehend. It is unfathomable that the peaceful, accommodating young man that I watch grow up would commit such an act. From what I have observed since this fateful incident, I do not believe that Jeffrey understands what happened either. I have found him to be remorseful and regretful for his actions; and grateful that he did not take the young lady's life. The Jeffrey Grimes that pulled the trigger in a moment that could only have been the outcome of him snapping is not the same young man I knew or that I have experienced since.

I do not condone Jeffrey's action, but I also do not believe that he would commit the act again. It is for that reason that I am writing this letter of support. I ask that you consider his modest up-bringing, his good temperament, his lack of a violent or criminal history, and all of his many redeeming qualities; that you forgive his poor judgment and thoughtless action; and that you grant him mercy. Please give Jeffrey Grimes an opportunity to show that he can still be a contributing member of the society.

Thank you for reading this letter.

Sincerely



Bassey A. Eyo

THE LAW OFFICE OF JONATHAN WALLER, LLC

1720 MAIN STREET, SUITE 104
COLUMBIA, SC 29201

August 26, 2014

Jeffrey N. Grimes
SCDC ID: 00353213
Lieber Correctional Institution
Stonò Dorm - B14
P.O. Box 205
Ridgeville, SC 29472

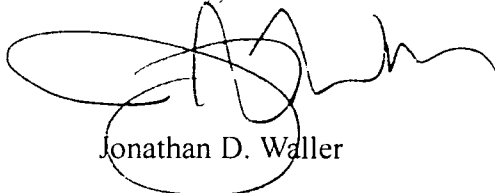
Re: Jeffrey N. Grimes vs. State of South Carolina
C/A No: 2013-CP-38-00432

Dear Mr. Grimes:

I have received your letter along with a "Petition for Bail" that you have asked me to file with the Court once your appeal is filed. I will forward that motion on to the Court once the Notice of Appeal has been filed. I also am aware of the issues that we discussed that will be a part of a potential 59(e) motion. You have asked me to provide you a copy of the 59(e) motion that I have filed, but I cannot file that, or any pleadings, regarding the Final Order until it has been signed and served on me. As soon as that occurs I will move forward and will forward you copies of both the Order and anything that I file in response to it, including a possible 59(e) motion and a notice of appeal.

My last letter to you explained that I have not received any emails from you since a day or two after the hearing. I am unsure of what the issue is, but I am not receiving them as I was before. Nothing has changed with my system so there must be some sort of change with the SCDC system.

Sincerely,



Jonathan D. Waller

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM ORANGEBURG COUNTY
Maité Murphy, Circuit Court Judge

2013-CP-38-00432

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SEP 18 2014

S.C. Supreme Court

Jeffrey N. Grimes, #353213,

Appellant,

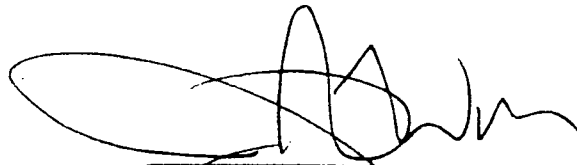
v.

STATE OF SOUTH CAROLINA,

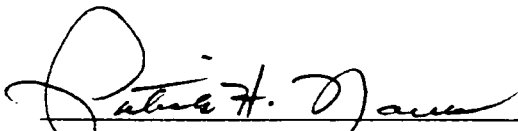
Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that one copy of the Appellant's Notice of Appeal in the above-entitled case has been served upon opposing counsel, Megan Harrigan, Assistant Attorney General, by mailing in an envelope properly addressed with postage prepaid on this 15th day of September 2014.


Jonathan D. Waller

SWORN TO BEFORE me this 15th day
of September, 2014.


Notary Public for South Carolina
My Commission Expires: 08/17/2015

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In The Supreme Court

APPEAL FROM ORANGEBURG COUNTY
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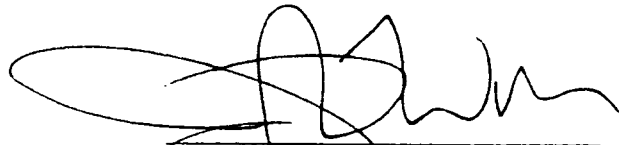
v.

STATE OF SOUTH CAROLINA,

Respondent.

NOTICE OF APPEAL

Jeffrey N. Grimes, #353213, appeals the Order of Dismissal denying his Application for Post-Conviction Relief filed August 22, 2014 and served on counsel by letter dated September 3, 2014 and received by counsel September 4, 2014, issued by the Honorable Maité Murphy, Presiding Judge, First Judicial Circuit.



Jonathan D. Waller

The Law Office of Jonathan Waller, LLC
SC Bar No.: 76290
1720 Main Street, Suite 104
Columbia, SC 29201
803-256-0011 (phone)
866-213-8870 (fax)
jonathanwallerlaw@gmail.com
ATTORNEY FOR PETITIONER

This 15th day of September, 2014.

Other Counsel of Record:

Megan Harrigan, Assistant Attorney General

Post Office Box 11549

Columbia, SC 29211

(803) 734-3319

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM ORANGEBURG COUNTY
Maité Murphy, Circuit Court Judge

2013-CP-38-00432

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Jeffrey N. Grimes, #353213,

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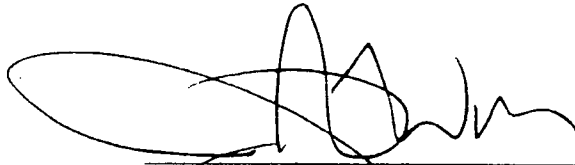
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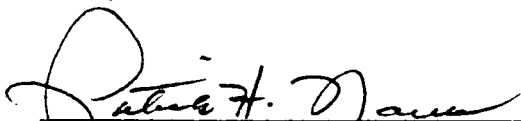
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The undersigned hereby certifies that one copy of the Appellant's Notice of Appeal in the above-entitled case has been served upon opposing counsel, Megan Harrigan, Assistant Attorney General, by mailing in an envelope properly addressed with postage prepaid on this 15th day of September 2014.

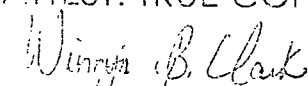


Jonathan D. Waller

SWORN TO BEFORE me this 15th day
of September, 2014.



Notary Public for South Carolina
My Commission Expires: 08/17/2015

ATTEST: TRUE COPY

CLERK OF COURT
ORANGEBURG COUNTY, SC

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM ORANGEBURG COUNTY
Maité Murphy, Circuit Court Judge

2013-CP-38-00432

Jeffrey N. Grimes, #353213,

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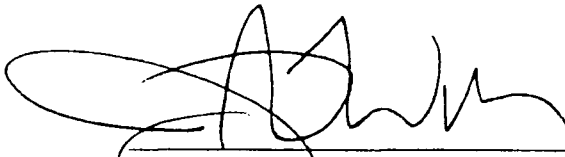
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803-256-0011 (phone)
866-213-8870 (fax)

jonathanwallerlaw@gmail.com
ATTORNEY FOR PETITIONER

TEST: TRUE COPY



CLERK OF COURT
ORANGEBURG COUNTY, SC

This 15th day of September, 2014.

Other Counsel of Record:
Megan Harrigan, Assistant Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3319

JEFFREY N. GRIMES-353213

LETT-STONO-B14

P.O. Box 205

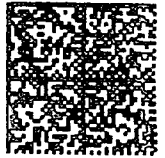
Ridgelyville, S.C. 29472

THE HONORABLE DANIEL E. SHEAROUSE,
CLERK OF COURT, S.C. SUPREME COURT

Post Office Box 11330

Columbia, S.C. 29211

FIRST CLASS



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