

STATE OF SOUTH CAROLINA

In The Court of Appeals

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OCT 13 2014

**SC Court of Appeals**

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APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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Case No. 2013-002379

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Ronald Coulter, #300410,

Appellant,

v.

State of South Carolina,

Respondent.

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APPELLANT'S REPLY MEMORANDUM

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The Respondent, in its opposing brief in No. 2013-002379, has attempted to diminish the nature of the questions presented in the Appellant's petition for state habeas corpus by truncated quotations from the Appellant's supporting arguments, to the questions presented, in an attempt to establish support for the lower court's dismissal of the Appellant's habeas petition.

The Appellant, in his habeas petition, raised the question of whether his 14th Amendment protection against arbitrary state action was violated by the state PCR court's adjudication of his 6th Amendment claims. The Appellant did not merely ask whether

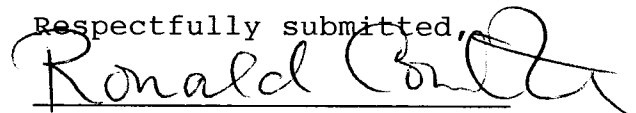
the state PCR court improperly adjudicated his claims, as asserted by the Respondent.

In addition, the Appellant also raised the question of whether the Due Process Clause of the 14th Amendment affords a criminal defendant, as an equitable matter, the effective assistance of counsel in a first-tier collateral review as of right to a Sixth Amendment right to counsel claim. The Appellant did not merely ask whether his PCR counsel rendered adequate representation, as asserted by both the lower court and the Respondent.

Consequently, the arguments submitted by the Respondent are insufficient to face: 1) the questions presented in the petition for state habeas corpus; and, 2) the statement of issues as presented in the brief on appeal.

For the reasons advanced in the initial brief of appellant, it is respectfully submitted that this Court should reverse the dismissal of the Appellant's petition for writ of state habeas corpus.

October 10, 2014

Respectfully submitted,  


Ronald Coulter, #300410  
BRCI Wateree 195  
4460 Broad River Road  
Columbia, SC 29210

Appellant, Pro Se

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Appeal From Charleston County  
R. Markley Dennis, Circuit Court Judge

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**SC Court of Appeals**

Ronald Coulter, Appellant

v.

State of South Carolina, Respondent

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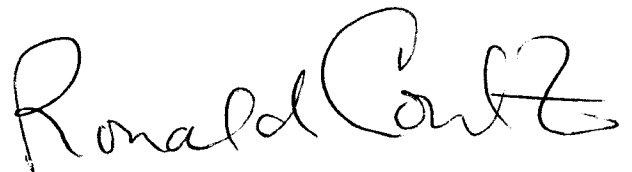
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I, Ronald Coulter, certify that I have served the within Appellant's Reply Memorandum on Respondent by depositing of the same in the U.S. Mail, postage prepaid, addressed to:

Ashleigh R. Wilson  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

I further certify that all parties required by Rule to be served have been served.

October 10, 2014



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Ronald Coulter, #300410

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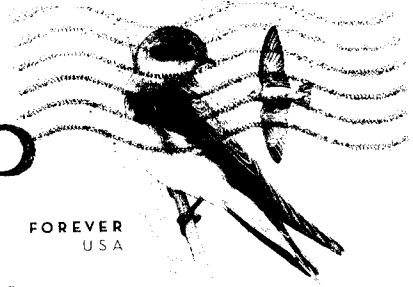
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**SC Court of Appeals**

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