

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
William P. Keesley, Circuit Court Judge

Appellate Case No. 2014-002208

RECEIVED
NOV 03 2014
SC Court of Appeals

EX PARTE

Quentin Raymar Price, Appellant

IN RE.

The State of South Carolina, Respondent,

v.

Quentin Raymar Price, Appellant.

MOTION TO ASSOCIATE COUNSEL

Appellant Quentin Raymar Price moves for an order from the Court associating the Appellate Division of the South Carolina Commission on Indigent Defense for the purpose of the costs and printing necessary to defend this appeal. He would show the Court:

1. He was found guilty of contempt of court in the Central Criminal Domestic Violence Magistrate Court in Lexington County and appealed his conviction to the Court of Common Pleas in Lexington County.
2. The Honorable William P. Keesley reversed his conviction on other grounds but found that the Magistrate had subject matter jurisdiction to punish for contempt where

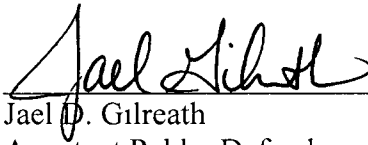
the conduct forming the basis for the contempt proceeding is an alleged violation of bond conditions Appellant has appealed this ruling

3. The undersigned counsel is employed by the Eleventh Circuit Public Defender's Office. She was appointed to represent respondent Price on his substantive criminal charges in the Magistrate Court for Lexington County. She also represented him in his appeal to the Court of Common Pleas before Judge Keesley.
4. Counsel is willing to continue her representation of Appellant Price. However, the circuit defender offices were established to represent persons charged in the trial courts Counsel's office does not have the equipment or experienced staff to efficiently process the materials necessary to proceed with this appeal. Moreover, the Eleventh Circuit Public Defender's Office does not have money budgeted for obtaining transcripts or document copying and binding. The office would need to seek reimbursement for the costs of defending this appeal from the South Carolina Commission on Indigent Defense
5. The Appellate Division of the South Carolina Commission on Indigent Defense has the staff and expertise to process the paperwork in this case in an efficient and cost-effective manner
6. This case is before the Court in a unique procedural posture. The subject matter is outside the scope of representation of both the Eleventh Circuit Public Defender's Office and the Appellate Division of the South Carolina Commission on Indigent Defense Nevertheless, as stated before, counsel is willing to continue her representation by writing the briefs and arguing the case before the Court She

merely seeks to have the Appellate Division joined as counsel for the purpose of costs and printing.

THEREFORE, having fully set forth his motion, Appellant Price asks the Court to appoint the Appellate Division of the South Carolina Commission on Indigent Defense as counsel for the purpose of costs and printing.

Respectfully submitted,



Jael D. Gilreath
Assistant Public Defender
Eleventh Circuit Public Defender's Office
407 1/2 West Main Street
Lexington SC 29072
(803) 785-8873
Counsel for Appellant Quentin Raymar Price

Dated: October 30, 2014

Other Counsel of Record

Nicole Howland
Criminal Domestic Violence Prosecutor
Lexington County Sheriff's Department
521 Gibson Road
Lexington, SC 29072

Counsel for Respondent State of South Carolina

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IN RE:


The State of South Carolina, Respondent,

v.

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PROOF OF SERVICE

I certify that I have served the Motion to Associate Counsel on Nicole Howland, by depositing a copy of it in the United States Mail, postage prepaid, on October 30, 2014, addressed to Nicole Howland, Criminal Domestic Violence Prosecutor, Lexington County Sheriff's Department, 521 Gibson Road, Lexington, SC 29072.



Jael D. Gilreath
Assistant Public Defender
407 1/2 W. Main Street
Lexington, SC 29072

Date: 10/30/2014

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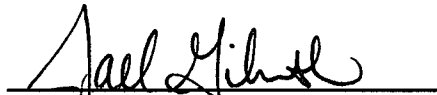
The State of South Carolina, Respondent,

v.

Quentin Raymar Price, Appellant

PROOF OF SERVICE

I certify that I have served the Motion to Associate Counsel on Robert Dudek, by depositing a copy of it in the United States Mail, postage prepaid, on October 30, 2014, addressed to Robert Dudek, Chief Appellate Defender, South Carolina Commission on Indigent Defense, Appellate Division, P O Box 11589, Columbia, SC 29211



Jael D. Gilreath
Assistant Public Defender
407 ½ W. Main Street
Lexington, SC 29072

Date: 10/30/2014

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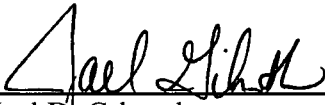
The State of South Carolina, Respondent,

v

Quentin Raymar Price, Appellant.

PROOF OF SERVICE

I certify that I have served the Motion to Associate Counsel on J. Hugh Ryan, III, by depositing a copy of it in the United States Mail, postage prepaid, on October 30, 2014, addressed to J Hugh Ryan, III, Deputy Director, South Carolina Commission on Indigent Defense, P.O. Box 11433, Columbia, SC 29211



Jael D. Gilreath
Assistant Public Defender
407 1/2 W Main Street
Lexington, SC 29072

Date 10/30/2014

OFFICE OF THE PUBLIC DEFENDER

ELIZABETH FULLWOOD
Lexington Public Defender
407½ W Main St
Lexington, SC 29072
Telephone (803) 957-8873
Fax (803) 957-1443

Eleventh Judicial Circuit
Lexington, Saluda, Edgefield,
and McCormick Counties

ROBERT M. MADSEN
Circuit Public Defender

BENNETT CASTO
Tri-County Public Defender
Post Office Box 1852
McCormick, SC 29835
Telephone (864) 852-9555
Fax (864) 852-9554

October 30, 2014

The Honorable Jenny Kitchings
Clerk of Court for Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Re: **The State vs. Quentin Price (Motion to Associate Counsel)**

Dear Ms. Kitchings:

I have enclosed an original and one copy of the Appellant's Motion to Associate Counsel in the above matter for filing in your office. Please file the original and return the date/time stamped copy to me in the envelope provided.

I am, by copy of this letter, serving a copy of this Notice to Appeal on Criminal Domestic Violence Prosecutor Nicole Howland, Chief Appellate Defender Robert Dudek, and Deputy Director of the South Carolina Commission on Indigent Defense J. Hugh Ryan, III, together with my Certificates of Service

Thank you for your assistance in this matter

Sincerely,



Jael D Gilreath
Assistant Public Defender
407 ½ West Main Street
Lexington, SC 29072
(803) 785-8873

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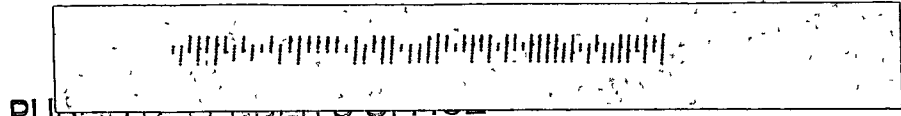
SC Court of Appeals

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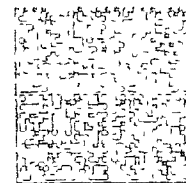
cc Nicole Howland, Criminal Domestic Violence Prosecutor
Lexington County Sheriff's Department
521 Gibson Road
Lexington, SC 29072

Robert M. Dudek, Chief Appellate Defender
South Carolina Commission on Indigent Defense
Appellate Division
P.O. Box 11589
Columbia, SC 29211

J. Hugh Ryan, III, Deputy Director
South Carolina Commission on Indigent Defense
P.O. Box 11433
Columbia, SC 29211



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LEXINGTON, SC 29072



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