

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
HONORABLE LETITIA H. VERDIN

Case No.: 2013-CP-23-6153

JOSEPH PAUGH,)
)
 PETITIONER,)
)
 vs.)
)
 STATE OF SOUTH CAROLINA)
)
 RESPONDENT.)

NOTICE OF APPEAL

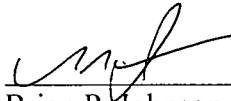
The Petitioner, Joseph Paugh, hereby appeals the Honorable Letitia H. Verdin's December 8, 2014, order denying post-conviction relief to the Petitioner. This order was received by the undersigned counsel on December 29, 2014. A copy of the order on appeal is attached to this notice.

RECEIVED

JAN 16 2015

S.C. SUPREME COURT

Respectfully submitted,



Brian P. Johnson, Esq.
522 North Church Street
Greenville, SC 29601
Attorney for Petitioner
SC Bar: 73996

Date: January 12, 2015

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
HONORABLE LETITIA H. VERDIN

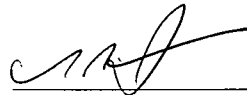
Case No.: 2013-CP-23-6153

JOSEPH PAUGH,)
)
 PETITIONER,)
)
 vs.)
)
 STATE OF SOUTH CAROLINA)
)
 RESPONDENT.)
)

PROOF OF SERVICE

I, Brian P. Johnson, Esq., certify that I have today served the within notice of appeal upon the Respondent by depositing a copy in the United States Mail, postage prepaid, addressed to the attorney of record, Karen Ratigan, at P.O. Box 11549 Columbia, SC 29211.

Respectfully submitted,



Brian P. Johnson, Esq.
522 North Church Street
Greenville, SC 29601
Attorney for Petitioner
SC BAR: 73996

Greenville, SC
January 12, 2015

JUDGMENT IN A CIVIL CASE

CASE NO: 2013CP2306153

FILED-CLERK OF COURT
GREENVILLE, S.C.
PAUL B. WICKENS
2014 DEC 19 PM 4:38

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE
IN THE COURT OF COMMON PLEAS

Joseph Paugh vs. South Carolina State Of

CHECK ONE:

JURY VERDICT.

This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.

DECISION BY THE COURT.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

ACTION DISMISSED (CHECK REASON):

SCRCP (Vol. Nonsuit);

Rule 43(k), SCRCP (Settled);

Rule 12(b), SCRCP;

Rule 41(a),

Other: _____

ACTION STRICKEN (CHECK REASON):

Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other: _____

Rule 40(j) SCRCP;

Bankruptcy;

DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):

Affirmed;

Reversed;

Remanded;

Other: _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:

See attached order;

Statement of Judgment by the Court;

Dated at Greenville, South Carolina, this .

Court Reporter:

PRESIDING JUDGE - Letitia H Verdin

This judgment was entered on the , and a copy mailed first class this , to attorneys of record or to parties (when appearing pro se) as follows:

Brian P. Johnson 522 North Church Street
Greenville, SC 29601

ATTORNEY(S) FOR THE PLAINTIFF(S)

Karen Christine Ratigan PO Box 11549 Columbia, SC 29211

ATTORNEY(S) FOR THE DEFENDANT(S)

Paul B. Wickens
Clerk of Court

Greenville County
Clerk of Court

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO: 2013CP2306153

FILED-CLERK OF COURT
GREENVILLE CO. SC.
PAUL B. WICKENSIMER
2014 DEC 19 PM 4:38

Joseph Paugh vs. South Carolina State Of

CHECK ONE:

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**
 - Rule 12(b), SCRPC;
 - Rule 41(a), SCRPC (Vol. Nonsuit);
 - Rule 43(k), SCRPC (Settled);
 - Other: _____
- ACTION STRICKEN (CHECK REASON):**
 - Rule 40(j) SCRPC;
 - Bankruptcy;
 - Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 - Other: _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 - Affirmed;
 - Reversed;
 - Remanded;
 - Other: _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order; Statement of Judgment by the Court:
Dated at Greenville, South Carolina, this .

Court Reporter:

PRESIDING JUDGE - Letitia H Verdin

This judgment was entered on the , and a copy mailed first class this , to attorneys of record or to parties (when appearing pro se) as follows:

Brian P. Johnson 522 North Church Street
Greenville, SC 29601

Karen Christine Ratigan PO Box 11549 Columbia,
SC 29211

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Paul B. Wickensimer Greenville County Clerk Of Court
- Clerk of Court

STATE OF SOUTH CAROLINA)
)
 COUNTY OF GREENVILLE)
)
 Joseph Paugh, S.C.D.C. No. 343216,)
 Applicant,)
)
 v.)
)
 State of South Carolina,)
 Respondent.)
 _____)

IN THE COURT OF COMMON PLEAS

C.A. No. 2013-CP-23-6153

ORDER OF DISMISSAL

FILED-CLERK OF COURT
 GREENVILLE CO. S.C.
 PAUL B. WICKENSIMMER
 2014 DEC 19 PM 4 38

This matter comes before the Court by way of an application for post-conviction relief (PCR) filed November 19, 2013. The Respondent made its return on May 28, 2014. A hearing into the matter was held on October 22, 2014 before Judge Letitia H. Verdin at the Greenville County Courthouse. The Applicant was present and represented by Brian P. Johnson, Esquire. Karen C. Ratigan, Esquire of the South Carolina Office of the Attorney General represented the Respondent.

The Applicant testified on his own behalf at the PCR hearing. Also testifying was the Applicant's trial counsel, Christopher D. Scalzo, Esquire. The Court had before it the trial transcript; the Greenville County Clerk of Court records, including the arrest warrant, indictment and sentencing sheet; the Applicant's South Carolina Department of Corrections Records; the PCR Application, and the Return.

PROCEDURAL HISTORY

The Applicant is confined in the South Carolina Department of Corrections pursuant to orders of commitment from the Greenville County Clerk of Court. The Greenville County Grand Jury indicted the Applicant in its June 2010 term for criminal sexual conduct with a minor in the first degree (2009-GS-23-8144).

After the State called the case to trial, the Applicant was found guilty. On October 14, 2010, the Honorable D. Garrison Hill sentenced the Applicant to thirty years imprisonment.

A notice of appeal was filed at the South Carolina Court of Appeals. Dayne C. Phillips, Esquire, of the South Carolina Commission on Indigent Defense, Division of Appellate Defense, perfected the appeal. The Court of Appeals affirmed the Applicant's conviction and sentence. State v. Paugh, Op. No. 2012-UP-659 (S.C. Ct. App. Dec. 19, 2012). The Remittitur was sent on January 11, 2013.

ALLEGATIONS

The Applicant argues that he is entitled to post-conviction relief because he received ineffective assistance of trial counsel; received ineffective assistance of appellate counsel; and experienced a violation of the Due Process Clause. The Applicant's ineffective assistance claim was the only argument presented at the PCR hearing.

Regarding the claim for ineffective assistance of trial counsel, the Applicant asserts:

- a. Counsel failed to investigate to pinpoint the date(s) of the alleged incident(s);
- b. Counsel failed to seek an expert witness;
- c. Counsel failed to object to the Assistant Solicitor's improper comment and failed to request a mistrial thereafter;
- d. Counsel failed to argue that the State violated Rule 403 of the South Carolina Rules of Evidence;
- e. Counsel failed to object to or strike a juror who was seated, where the juror's information was not properly included in the juror information packet; and
- f. Counsel failed to advise the Applicant to testify in his own defense.

Regarding the claim for ineffective assistance of appellate counsel, the Applicant asserts that counsel failed to properly file his appeal with the South Carolina Court of Appeals. Regarding the Due Process violation, the Applicant argues that the South Carolina Court of Appeals violated his constitutional rights by issuing an unpublished opinion without oral argument.



FINDINGS OF FACT AND CONCLUSIONS OF LAW

This Court has had the opportunity to review the record in its entirety and has heard the testimony and arguments presented at the PCR hearing. This Court has further had the opportunity to observe each witness who testified at the hearing, and to closely pass upon their credibility. This Court has weighed the testimony accordingly.

Set forth below are the relevant findings of fact and conclusions of law as required by S.C. Code Ann. § 17-27-80 (2013).

Ineffective Assistance of Counsel

The Applicant alleges he received ineffective assistance of counsel. In a PCR action, “[t]he burden of proof is on the applicant to prove his allegations by a preponderance of the evidence.” Frasier v. State, 351 S.C. 385, 389, 570 S.E.2d 172, 174 (2002).

For an applicant to be granted PCR as a result of ineffective assistance of counsel, he must show both: (1) that his counsel failed to render reasonably effective assistance under prevailing professional norms, and (2) that he was prejudiced by his counsel's ineffective performance. See Strickland v. Washington, 466 U.S. 668, 686 (1984); Porter v. State, 368 S.C. 378, 629 S.E.2d 353, 356 (2006). Regarding the first prong, the Applicant must in essence show that counsel's advice was not “within the range of competence demanded of attorneys in criminal cases.” Hill v. Lockhart, 474 U.S. 52, 56 (1985). In order to prove prejudice, an applicant must show “there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different.” Cherry v. State, 300 S.C. 115, 117–18, 386 S.E.2d 624, 625 (1989). A reasonable probability is “a probability sufficient to undermine confidence in the outcome of trial.” Johnson v. State, 325 S.C. 182, 186, 480 S.E.2d 733, 735 (1997) (citing Strickland, 466 U.S. at 686).



Furthermore, the decisions and advice of trial counsel should be assessed for reasonableness under all the circumstances, with heavy deference given to counsel's judgment. Simpson v. Moore, 367 S.C. 587, 597, 627 S.E.2d 701, 706 (2006). A criminal defense attorney has a duty to conduct a reasonable investigation so that he may discover all reasonably available mitigation evidence, as well as any reasonably available evidence tending to rebut evidence produced by the state. McKnight v. State, 378 S.C. 33, 46, 661 S.E.2d 354, 361 (2008). There is a strong presumption that adequate assistance of counsel was rendered, and that reasonable care was exercised—particularly in the arena of professional judgments. Ard v. Catoe, 372 S.C. 318, 331, 642 S.E.2d 590, 597 (2007).

a. Trial counsel's failure to investigate the date(s) of the incident(s).

The Applicant asserts that trial counsel was ineffective because he did not pinpoint the date(s) of the alleged incident(s) of abuse. This particular argument was raised at the PCR hearing, while the application for relief merely raises a claim of failure to investigate.

The Applicant testified at the PCR hearing that the incidents giving rise to the charge allegedly occurred over a span of six years, from 1998 to 2004. He argues that this broad range of time prevented him from preparing a proper defense and consequently deprived him of the effective assistance of counsel.

The Applicant's trial counsel testified that the range of years was included in the original indictment that was presented to the Grand Jury. He further testified that, while he did not specifically recall this case, it is his standard practice to narrow the timeframe of the alleged incident(s) through communication with the Solicitor's Office, as well as witnesses.

This Court finds that the Applicant has failed to meet his burden of proving counsel was ineffective for failing to narrow down this timeframe. The evidence presented at the PCR

hearing demonstrates that trial counsel conducted a reasonable investigation into the facts of the Applicant's case, as required by McKnight v. State, 378 S.C. at 46, 661 S.E.2d at 361. There was further no evidence that the result of the case would have been different had a different course of action been taken. This Court finds that trial counsel's investigation of the case and preparation for trial were reasonably effective under the prevailing professional norms of the legal community. Furthermore, the Applicant demonstrated no prejudice as a result of the date range use at trial.

b. Trial counsel's failure to seek an expert witness.

The Applicant argues that trial counsel was ineffective because he failed to seek and present an expert witness on the Applicant's behalf. No testimony or other evidence was presented on this subject at the PCR hearing. The Applicant further has not demonstrated that, had an expert been called, the outcome of his trial would have been different. Therefore, this Court finds that the Applicant has not met his burden of proving that counsel was ineffective in this manner.

c. Trial counsel's failure to object to the Assistant Solicitor's improper comment and failed to request a mistrial thereafter.

The Applicant asserts that trial counsel was ineffective because he failed to object and request a mistrial after the Assistant Solicitor asked the Applicant, "How do you look at yourself in the mirror, every day after what you did to your daughter?" (Trial Tr. 220.)

The Applicant testified that he believed this comment to be highly inflammatory and prejudicial. He argues that trial counsel's failure to object to this comment, to ask for a curative instruction to the jury, or to move for a mistrial constitutes ineffective assistance of counsel.

The Applicant's trial counsel testified that he recalled the comment and objected to it as soon as it was made. (See Trial Tr. 220.) Upon his objection the Assistant Solicitor withdrew the



question and sat down. (Id.) Based on the Assistant Solicitor's actions, trial counsel did not in his judgment believe any further action was required.

This Court finds that in this instance it is appropriate to defer to trial counsel's professional judgment under Simpson v. Moore, 367 S.C. at 587, 627 S.E.2d at 706. As discussed in Simpson, an attorney's decisions relating trial strategy are entitled to a high level of deference by reviewing courts. Furthermore, as noted in Ard v. Catoe, there is a strong presumption that reasonably effective assistance was given, particularly where a professional judgment is under scrutiny. 372 S.C. at 331, 642 S.E.2s at 597. This Court finds that the Applicant has not overcome this presumption here. Trial counsel's decision not to draw further attention to the Assistant Solicitor's comment is, as a matter of trial strategy, reasonably effective. Therefore, the Applicant is not entitled to post-conviction relief on this basis.

d. Trial counsel's failure to argue that the State violated Rule 403 of the South Carolina Rules of Evidence.

The Applicant has not offered any evidence or argument on this subject. Therefore, this Court finds that the Applicant has not met his burden of proving either prong of Strickland's ineffective assistance standard in this respect.

e. Trial counsel's failure to object to the seating of a juror.

The Applicant claims that trial counsel was ineffective because he permitted a juror to be seated without knowing sufficient information about her.


Criminal defendants have a constitutional right to a fair and impartial jury. U.S. Const. amends. VI and XIV; S.C. Const. art I, § 14; State v. Woods, 345 S.C. 583, 587, 550 S.E.2d 282, 284 (2001). While the Sixth and Fourteenth Amendments provide a defendant with the constitutional right to a fair and impartial jury of his peers, this right does not entitle a defendant to handpick a jury. State v. Stanko, 376 S.C. 571, 576, 658 S.E.2d 94, 97 (2008).



The trial judge has a duty to ensure that a jury of fair, impartial, and unbiased jurors is impaneled. S.C. Code Ann. §§ 14-7-1010 –1020 (2014); State v. Powers, 331 S.C. 37, 43, 501 S.E.2d 116, 119 (1998). In order to identify any potential sources of bias, the trial judge must ask potential jurors whether they are aware of any bias or prejudice against a party—a process commonly known as *voir dire*. State v. Woode, 345 S.C. 583, 588, 550 S.E.2d 282, 284 (2001). A trial judge acts with discretion when he evaluates a prospective juror's competence. State v. Simpson, 325 S.C. 37, 41, 479 S.E.2d 57, 59 (1996). The trial judge's determination of the ability of a prospective juror to be neutral will not be disturbed on appeal in the absence of manifest error. DeLee v Knight, 266 S.C. 103, 111–12, 221 S.E.2d 822, 847 (1975).

The scope of *voir dire* and the manner in which it is conducted are within the sound discretion of the trial court. Stanko, 376 S.C. at 575, 658 S.E.2d at 96. Where the parties wish to ask potential qualified jurors about their specific views of a topic, they may do so only with the express permission of the trial court. Cf. id. “The Constitution, after all, does not dictate a catechism for *voir dire*, but only that the defendant be afforded an impartial jury.” Id. at 576, 658 S.E.2d at 97. To overturn a conviction due to a *voir dire* error, the Applicant must show that the court's failure to ask or allow a certain examination rendered the defendant's trial fundamentally unfair. State v. Wise, 359 S.C. 14, 23, 596 S.E.2d 475, 479 (2004).

The Applicant testified at the PCR hearing that he did not know anything about a Juror 86, who was seated for his trial, because this juror had not properly turned in her juror information sheet prior to *voir dire*. The Applicant's trial counsel confirmed that there was no information in the jury packet concerning Juror 86, and the Court rectified this problem by conducting an oral examination of her in the courtroom. (See Trial Tr. 15.) At the conclusion of this examination, the Court determined that Juror 86 was qualified to serve. (Id.)



The Applicant's trial counsel further testified, based on the information revealed during this oral examination, that he did not believe it prudent to exercise a peremptory strike for Juror 86. Trial counsel stated that Juror 86 was the third juror presented, and he believed that he needed to save his strikes for future and more compelling *voir dire* issues. Such a strategic decision is entitled to deference by this Court in accordance with Simpson v. Moore, 367 S.C. at 587, 627 S.E.2d at 706.

To the extent that the Applicant contends that he is entitled to PCR as a result of the trial court's oral examination of Juror 86, this Court finds that such relief is not merited. The trial court's oral examination of Juror 86, conducted on the record and in the presence of the Applicant, satisfies the constitutional requirements to ensure a fair and impartial trial by an unbiased jury. To the extent that the Applicant asserts that he is entitled to PCR because of trial counsel's failure to exercise a peremptory strike, this Court further finds that trial counsel's decision was within his discretion. Trial counsel's strategic decision does not demonstrate ineffective assistance of counsel such that it entitles the Applicant to post-conviction relief.

f. Trial counsel's failure to advise the Applicant to testify.

A criminal defendant has a fundamental right to testify in his own defense, just as he has a right to remain silent. Rock v. Arkansas, 483 U.S. 44, 53 (1987). However, the right to present testimony is not without limitation. State v. Rivera, 402 S.C. 225, 242, 741 S.E.2d 694, 703 (2013) (citing Rock v. Arkansas, 483 U.S. at 55). The right may be limited to accommodate other legitimate interests in the criminal trial process. Id.

A criminal defendant also has the right to put in evidence of his good character, either by taking the stand or presenting character witnesses. State v. Lyles, 210 S.C. 87, 91, 41 S.E.2d 625, 627 (1947). However, such evidence opens the door for the State to provide other evidence of



the criminal defendant's character only for those traits focused on by the accused. State v. Major, 301 S.C. 181, 185, 391 S.E.2d 235, 238 (1990). Additionally, a criminal defendant is only permitted to provide evidence of "pertinent" character traits—those involved with the offenses charged. State v. Mizell, 332 S.C. 273, 277, 504 S.E.2d 338, 340 (Ct. App. 1998).

The Applicant claims that he told his attorney that he wished to testify at trial, and that he wished to be prepared for this testimony by his attorney. The Applicant asserted at his PCR hearing that he wanted to testify about his skill and competency as a father, but that trial counsel advised him against it and did not afford him an opportunity to discuss the subject at trial.

The Applicant's trial counsel testified that he recalled some discussion about the Applicant testifying, but believed that the suggested subject might lead to objections based on relevancy and would not help to assert a viable defense. The trial transcript reveals that the Applicant did testify in his own defense at trial. (Trial Tr. 206–20.) This testimony primarily focused on providing the Applicant's version of events as well as general background for the jury's consideration. The Applicant did not testify on the subject of his capabilities as a father.

This Court finds that the Applicant's right to testify was respected, and a substantial amount of time during the trial was dedicated to this testimony. Before testifying, the trial court asked the Applicant several questions to make sure he understood the rights and considerations involved in his decision. (Trial Tr. 202–05.) The question of the scope of the Applicant's testimony was never raised during his trial. Additionally, the subjects of testimony that the Applicant raised during his PCR hearing appear to amount to character evidence about a non-pertinent trait. Such evidence would likely have been found to be inadmissible under Rule 401 of the South Carolina Rules of Evidence. Therefore, this Court finds that the Applicant has not shown that trial counsel's assistance in this matter was ineffective.

A handwritten signature in black ink, appearing to be the initials 'JH' with a stylized flourish.

g. Appellate counsel's failure to file a necessary petition with the South Carolina Court of Appeals.

This issue was not raised at the Applicant's PCR hearing. Furthermore, the Applicant has provided no indication of what particular petition or challenge should have been raised. In light of the absence of any evidence, this Court finds that the Applicant has not met his burden of proving that appellate counsel was ineffective.

Accordingly, this Court finds the Applicant has failed to prove the first prong of the Strickland test—that trial counsel failed to render reasonably effective assistance under prevailing professional norms. The Applicant failed to present specific and compelling evidence that trial counsel committed wither errors or omissions in his representation of the Applicant. This Court also finds that the Applicant has failed to prove the second prong of Strickland—that he was prejudiced by trial counsel's performance. This Court concludes the Applicant has not met his burden of proving counsel failed to render reasonably effective assistance. See Frasier, 351 S.C. at 389, 570 S.E.2d at 174.

All Other Allegations

As to any and all allegations that were raised in the application or at the hearing in this matter and not specifically addressed in this Order, this Court finds the Applicant failed to present any testimony, argument, or evidence at the hearing regarding such allegations. Accordingly, this Court finds the Applicant has abandoned any such allegations.

CONCLUSION

Based on all the foregoing, this Court finds that the Applicant has not established any constitutional violations or deprivations before or during his trial and sentencing proceedings. Counsel was not deficient and the Applicant was not prejudiced by Counsel's representation.

A handwritten signature in black ink, appearing to be the initials 'HJ' followed by a stylized flourish.

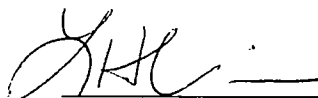
Furthermore, this Court finds no evidence of prosecutorial misconduct. Therefore, this PCR application must be denied and dismissed with prejudice.

This Court advises the Applicant that he must file a notice of intent to appeal within thirty (30) days from the receipt of this Order if he wants to secure appellate review. His attention is also directed to Rules 203, 206, and 243 of the South Carolina Appellate Court Rules for the appropriate procedures to follow after notice of intent to appeal has been timely filed.

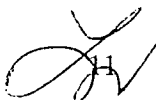
IT IS THEREFORE ORDERED:

1. That the application for post-conviction relief be denied and dismissed with prejudice; and
2. That the Applicant be remanded to the custody of the Respondent.

AND IT IS SO ORDERED this 8 ^{Dec.} day of ~~November~~, 2014.



Letitia H. Verdin
Circuit Court Judge
Thirteenth Judicial Circuit



LAW OFFICE OF BRIAN P. JOHNSON, LLC

P. 864.331.1630
F. 864.672.4009
www.brianpjohnsonlaw.com

522 North Church Street
Greenville, SC 29601
brian@brianpjohnsonlaw.com

January 13, 2015

VIA U.S. POSTAL

Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211

Re: Joseph Paugh vs. State of South Carolina
Appellate Case No.: 2013-CP-23-6153

Dear Clerk:

I am writing to you regarding the above referenced case. Please find enclosed copies of the Notice of Appeal, Proof of Service, and Order of Dismissal signed December 8, 2014.

If you wish to discuss the foregoing or need additional information please contact me at 864-331-1630.

Thank you.

RECEIVED

JAN 13 2015

S.C. SUPREME COURT

Sincerely,



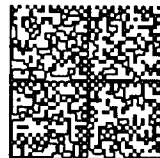
Brian P. Johnson

BPJ/lf

cc: Karen Ratigan, Esquire

Law Office of Brian P. Johnson

522 North Church Street
Greenville, SC 29601



PITNEY BOWES

02 1P

\$ 000.90⁰

0001812653- JAN 13 2015

MAILED FROM ZIP CODE 29601

Supreme Court of South Carolina

P.O. Box 11330

Columbia, SC 29211

29211 11330 0099

