

Brandt Rucker Attorney at Law, L.L.C.
522 North Church Street
Greenville, South Carolina 29601
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January 23, 2015

RECEIVED

JAN 28 2015

Daniel Shearouse, Clerk of Court
South Carolina Supreme Court
Post Office Box 11330
Columbia, S.C. 29211

S.C. SUPREME COURT

Jeffrey Bailey v. State, Appellate Case Number 2015-000009

Dear Mr. Shearouse:

I am in receipt of your letter of January 12, 2015 regarding *Dennison v. State* as to the decision of the lower court regarding the statute of limitations bar to my client's claim of Ineffective Assistance of Counsel. Additionally, your letter pointed to the requirements of *White v. State* regarding whether in my professional judgment, my client has a good faith explanation required for a guilty plea appeal under Rule 203(d)(1)(B) SCACR.

After a thorough review of case law regarding both the statute of limitations and direct appeal issues, and it is my professional belief that there is no good faith explanation showing that my client's Post Conviction Relief action is not barred by the statute of limitations. I also believe that there is no good faith explanation of any issue which can be reviewed on appeal regarding the guilty plea. As an officer of the court, I am unable to set forth any arguable basis for asserting that the determination of the lower court was improper.

I am sending a copy of your letter and my response to my client. Proof of service to him has been included to show notice to him of both letters. I am informing him of his right to file a *pro se* explanation as to why he believes that the circuit court's determination was improper through my cover letter.

If you have questions or concerns, please do not hesitate to contact me.

Sincerely,



Brandt Rucker, Esq.

cc: Jeffrey Eugene Bailey
ENCLOSURE

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2015-000009

State of South Carolina

Respondent,

v.

Jeffrey Eugene Bailey,
#297620

Appellant.

Proof of Service

I certify that I have served the Dennison letter and my response, by depositing a copy of it in the United States Mail, postage prepaid, on December 29, 2014, addressed to my client, Jeffrey Eugene Bailey, Inmate Number #297620 at Kirkland Correctional Institution 4344 Broad River Road, Columbia, SC 29210.

January 23, 2015

Sincerely,

s/ 

Brandt Rucker
Attorney for Appellant Jeffrey
Eugene Bailey
522 North Church Street
Greenville, South Carolina 29601
(864) 271-9925
Attorney for Appellant

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JAN 26 2015

S.C. SUPREME COURT