

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
{In The Supreme Court}

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of General Sessions

Kristi L. Harrington, Circuit Court Judge

Case No.2014-000681

Jeffery Memering,

Appellant,

Jeffery Memering,

Respondent.

REQUEST FOR EXTENSION OF TIME

The parties to this appeal request the time to correct the deficiencies in the wording of the Initial Brief and Proof of service. And ask for it to be extended by thirty days.

April 28, 2015

Jeffery Memering
322 King Charles circle
Summerville, SC. 29485
843-297-9847

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

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[In The Supreme Court]

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Court of General Sessions

Kristi L. Harrington, Court Judge

Case No. 2014-000681

Jeffery Memering

Respondent,

v.

Jeffery Memering,

Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Initial Brief, Designation of Matter and Motion to extend time, on Salley W. Elliot Esquire by depositing a copy of it in the United States Mail, postage prepaid, on April 29, 2015, addressed to this attorney of record, at PO BOX 11549 COLUMBIA, SOUTH CAROLINA.29211

APRIL 29 , 2015

Jeffery Memering
322 King Charles Circle
Summerville, South Carolina. 29485
(843)297-9847
Appellant

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Please find contained in this packet,

Initial Brief- form 13

Designation of Matter- form 14

Proof of Service- form 7's

Motion for Time Extension-

APRIL 29, 2015

Jeffery Memering
322 King Charles Circle
Summerville, South Carolina. 29485
(843)297-9847
Appellant

5

**FORM 13
BRIEF OF APPELLANT***

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

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MAY 11 2015

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APPEAL FROM CHARLESTON COUNTY
Court of General Sessions

Kristi L. Harrington, Court Judge

Case No 2014-000681

Jeffery Memering

Respondent,

v.

Jeffery Memering,

Appellant.

[INITIAL] BRIEF OF APPELLANT

Jeffery Memering
322 King Charles Circle
Summerville, South Carolina 29485
(843) 297-9847
Appellant

April,11,2015

* Under Rule 267(e), SCACR, the cover of the final briefs should be the following colors: brief of appellant - blue; brief of respondent - red; reply brief - gray; and amicus curiae or intervenor - green.

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STATEMENT OF ISSUES ON APPEAL

1. DID THE COURT ERROR BY THREATING RESPONDENT?
2. DID THE RESPONDENT RECEIVE FAIR TRIAL?
3. DID THE RESPONDENT FREELY ENTER PLEA ?

STATEMENT OF THE CASE

On February 26, 2014, The respondent was Threatened over and over by the court and was forced to enter a plea that was not voluntary.

FACTS

The respondent court appointed public defender will testify on these facts as stated.

1 ARGUMENTS

- I. BECAUSE OF SAID ACTION BY THIS COURT, RESPONDENT ENTERED A PLEA INVOLUNTARY .
- II. BECAUSE OF COURT SAID ACTIONS THE RESPONDENT WAS NOT GIVEN A FAIR AND JUST TRIAL.

CONCLUSION

For the reasons stated, this Court should reverse the judgment of the circuit court.

Respectfully submitted,

April 11, 2015

Jeffery Memering
322 King Charles Circle
Summerville, South Carolina 29485
(843) 297-9847
Appellant

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APRIL 11 , 2015

Jeffery Memering
322 King Charles Circle
Summerville, South Carolina 29485
(843)297-9847
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FORM 14
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

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Jeffery Memering,

Appellant.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

I certify that this designation contains no matter which is irrelevant to this appeal.

April, 11, 2015

Jeffery Memering
322 King Charles Circle
Summerville, South Carolina 29485
(843)297-9847