
THE STATE

vs.

PHILIP SIMONEAUX, a/k/a
PHILLIP GERALD SIMONEAUX

Appellant.

RETURN TO COURTS DIRECTIVE

AND

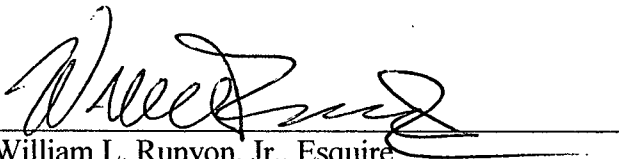
MOTION TO REMAND TO
CORRECT/COMPLETE RECORD
OR ISSUE CERT

Now comes the Appellant and responds to the Honorable Clerks Directive of June 3, 2015 as follows:

1. That there is no deficiency on the part of the Appellant herein.
2. That the Appellant has never been served with a Sentencing Sheet (3) and same has not been filed in the office of the Honorable Clerk of Court for Charleston County as of this date.
3. That the Appellant has substantially complied with the Appellate Court rules as the matters complained of in this Appeal are of Record (which has not yet been produced) and no sentencing sheet(s) have been served or filed for record in Charleston County.

4. That it does appear that the relevant Sentencing Sheet was filed in the Office of the Richland County Clerk of Court attached to a Form 9 but requests for same were met with a requirement that the relevant document be paid for.
5. That in consideration of the foregoing the Appellant moves as follows:
 - A. That the record not reflect a deficiency herein and the Appellant be allowed to proceed and/or
 - B. The matter be remanded to the Honorable Circuit Court for completion/reconstruction of the required filings herein or an Order of **certiorari** to bring up the required document issued to the Honorable Clerk of Richland County.

**RESPECTFULLY RETURNED AND MOVED THIS 10TH DAY OF JUNE, 2015
AT CHARLESTON, SOUTH CAROLINA.**


William L. Runyon, Jr., Esquire
#3 Gamecock Avenue, Suite 303
Charleston, SC 29407
SC Bar No.: 4838
(843) 571-3515

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE COURT OF APPEALS
Appellate Case No.: 2015-001171

THE STATE,)

Vs.)

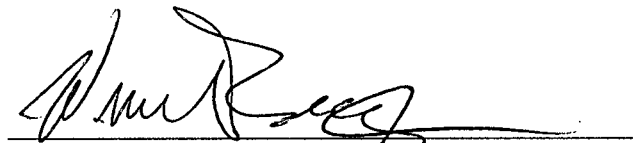
PHILIP SIMONEAUX, a/k/a)
PHILIP GERALD SIMONEAUX)
Defendant.)

CERTIFICATE OF MAILING

I William L. Runyon, Jr., Esquire, do hereby certify that on the 10th day of June, 2015, I served a copy of the **RETURN TO COURTS DIRECTIVE and MOTION TO REMAND TO CORRECT/COMPLETE RECORD** on the Honorable Solicitor and General Counsel – Department of Probation, Parole & Pardon in the within matter, by mailing copies to each of them by way of the United States Mail, with sufficient postage attached thereto and addressed as follows:

Honorable Scarlett Wilson
Solicitor for Charleston County
101 Meeting Street, Suite 400
Charleston, SC 29401

Honorable Matthew Buchanan
General Counsel
Department of Probation, Parole & Pardon
P. O. Box 50666
Columbia, SC 29250



William L. Runyon, Jr., Esquire
#3 Gamecock Avenue, Suite 303
Charleston, SC 29407
SC Bar No.: 4838
(843) 571-3515

Dated this 10th day of June, 2015
in Charleston, South Carolina.

William L. Runyon, Jr.

Attorney At Law

#3 Gamecock Avenue, Suite 303

Charleston, SC 29407

Telephone: (843) 571-3515 Facsimile: (843) 766-5085

June 10, 2015

RECEIVED
JUN 12 2015
SC Court of Appeals

Honorable Jenny Kitchens
Clerk of South Carolina Court of Appeals
1015 Sumter Street
P. O. Box 11629
Columbia, SC 29211

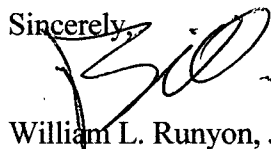
RE: State of South Carolina v. Philip Simoneaux, a/k/a Philip Gerald Simoneaux
Appellate Case No.:2015-001171

Dear Ms. Kitchens:

Enclosed please find **RETURN TO COURTS DIRECTIVE AND MOTION TO REMAND TO CORRECT/COMPLETE RECORD** together with **CERTIFICATE OF MAILING** in the above referenced matter. Please file originals and return certified copies to me in the stamped-self addressed envelope for your convenience.

Thanking you, I remain

Sincerely,



William L. Runyon, Jr.

WLR, JR. / bb

Enclosure

Cc: Honorable Clerk of Court for Charleston County
Honorable Scarlett Wilson
Honorable Matthew Buchanan

William L. Runyon, Jr.
Attorney At Law
#3 Gamecock Ave.,
Suite 303
Charleston, SC 29407

RECEIVED

JUN 12 2015

SC Court of Appeals

Honorable Jenny Kitchens
Clerk of South Carolina Court of Appeals
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P. O. Box 11629
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