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DEC 10 2015

SC Court of Appeals

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

) **IN THE SOUTH CAROLINA COURT OF APPEALS**
)
) Case No: 2015-002365
) Indictment No.: 2013GS1007411
) Warrant No: 2013A1010205477
) Charge: Murder
)

STATE OF SOUTH CAROLINA)

vs.)

) **MOTION TO ALLOW LATE FILING OF**
) **APPEALS CLAIM TO BE TREATED AS TIMELY**
) **FILED**

ISAAC ROMELL WILLIAMS,)
)
) Defendant.)

COMES NOW Defendant, Isaac Romell Williams, by and through his undersigned attorney, respectfully request to allow the late filed claim to be treated as timely filed. In support of this motion, Defendant submits the following:

1. On September 4, 2015 at 1:55 p.m., Defendant's attorney hand-delivered the South Carolina Court of Appeals package to the Charleston County Clerk of Court for filing, which included the following:

- a) Notice of Intent to Appeal,
- b) Proof of Service,
- c) Request for Representation,
- d) Proof of Filing with Charleston County Clerk of Court

2. On September 4, 2015, Defendant's attorney sent for filing an original and one (1) copy via US Postal Service to the South Carolina Court of Appeals, which included the following:

- a) Notice of Intent to Appeal filed stamped by Charleston County Clerk,
- b) Proof of Service file stamped by Charleston County Clerk,
- c) Request for Representation file stamped by Charleston County Clerk,
- d) Proof of Filing with Charleston County Clerk of Court, and

COMING TO

the attention of the public is hereby given that the following

persons have been appointed as members of the

Board of Directors of the

Company

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the following persons have been

appointed as officers of the

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e) Return envelope.

3. On September 4, 2015, the file-stamped copies of the South Carolina Court of Appeals package for Defendant, Isaac Romell Williams were sent to South Carolina Commission on Indigent Defense via US Postal Service and to Charleston County Solicitors, Scarlett Ann Wilson, Esquire and Jennifer Shealy, Esquire via Electronic mail.

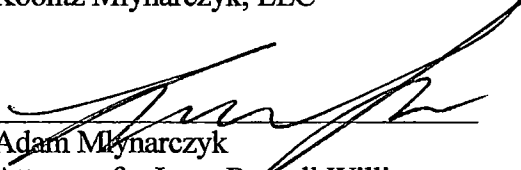
4. On Tuesday, November 10, 2015, a follow up call to South Carolina Court of Appeals Clerk of Court to check on status of appeals process determined that the Appeals Package for Defendant, Isaac Romell Williams was never received at which time new package was sent to South Carolina Court of Appeals.

5. On Monday, November 23, 2015, this firm received from the South Carolina Court of Appeals a copy of the appeals package for defendant, Isaac Williams, which was file-stamped on November 12, 2015.

6. On Friday, December 2, 2015, correspondence from Deputy Clerk of the South Carolina Court of Appeals was received indicating that the appeal documents for defendant, Isaac Williams, was not timely filed.

Wherefore, Defendant respectfully requests this Court to allow this late filed claim to be treated as timely filed.

Koontz Mlynarczyk, LLC


Adam Mlynarczyk
Attorney for Isaac Romell Williams

Charleston, South Carolina

Dated: 12-7-15

The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that proper record-keeping is essential for ensuring transparency and accountability in the organization's operations. This includes maintaining detailed financial statements, as well as records of personnel files, contracts, and other legal documents.

The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the use of advanced software solutions and manual data entry techniques to ensure the accuracy and reliability of the information. The document also discusses the importance of data security and privacy, emphasizing the need to implement robust security measures to protect sensitive information from unauthorized access and disclosure.

The third part of the document focuses on the integration of data from different sources and the use of this information to inform decision-making. It discusses the importance of data visualization and reporting, as well as the role of data in identifying trends and opportunities for improvement. The document also addresses the challenges of data integration and the need for standardized data formats and protocols.

The fourth part of the document discusses the importance of data governance and the role of data stewards in ensuring the quality and integrity of the organization's data. It emphasizes the need for clear policies and procedures regarding data access, use, and retention, as well as the importance of regular audits and monitoring to ensure compliance with these policies.

The fifth part of the document discusses the importance of data literacy and the need for ongoing training and education for all employees. It emphasizes the role of data in driving innovation and growth, and the need for employees to have the skills and knowledge to effectively use data in their work.

The sixth part of the document discusses the importance of data ethics and the need to ensure that data is used in a responsible and ethical manner. It emphasizes the need to respect individual privacy and to avoid using data in ways that could be harmful or discriminatory.

The seventh part of the document discusses the importance of data backup and recovery and the need to have a robust disaster recovery plan in place. It emphasizes the need to regularly back up data and to test the recovery process to ensure that data can be restored in the event of a disaster.

The eighth part of the document discusses the importance of data archiving and the need to have a clear policy regarding the retention and disposal of data. It emphasizes the need to archive data that is no longer actively used but may be needed for legal or compliance purposes.

The ninth part of the document discusses the importance of data security and the need to implement a comprehensive security program. It emphasizes the need to use strong passwords, multi-factor authentication, and other security measures to protect data from cyber threats.

The tenth part of the document discusses the importance of data governance and the need to have a clear policy regarding the ownership and control of data. It emphasizes the need to ensure that data is owned and controlled by the organization and that it is not shared or sold to third parties without proper authorization.

[Signature]
 [Name]
 [Title]

Date: [Date]
 Location: [Location]

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

DEC 10 2015

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of General Sessions

CASE NO.:

Indictment Number: 2013GS1007411

Warrant Number: 2013A1010205477

Charge: Murder

STATE OF SOUTH CAROLINA, RESPONDENT

VS.

ISAAC ROMELL WILLIAMS, APPELLANT

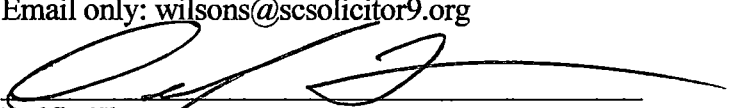
PROOF OF SERVICE

I certify that I have served the Motion to Allow Late Filing on Scarlett Wilson, Solicitor for Charleston County, South Carolina Court of Appeals and the South Carolina Commission of Appellate Indigent Defense, by delivering via US Regular Mail and Electronic Mail a copy of it on December 7, 2015 to:

South Carolina Court of Appeals
Attn: Honorable Jenny Abbott Kitchings
PO Box 11629
Columbia, SC 29211

South Carolina Commission of Indigent Defense
Email only: pmurdoch@sccid.sc.gov

Charleston County Solicitor's Office
Email only: wilsons@scsolicitor9.org


Delfin Floresca
Paralegal for Adam Mlynarczyk
Koontz Mlynarczyk, LLC
1058 East Montague Ave.
North Charleston, SC 29405
(843) 225-4252

Dated: 12/7/15

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adam@kmlawsc.com

RECEIVED

DEC 10 2015

SC Court of Appeals

Adam Mlynarczyk
ATTORNEY AT LAW

December 7, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: State of South Carolina vs. Isaac Romell Williams
MOTION TO ALLOW LATE FILING

Dear Ms. Kitchings:

Enclosed, an original and one (1) copy of the MOTION TO ALLOW LATE FILING, together with a copy of the first SC Appeals package from in the above matter and the Proof of Service upon the Circuit Solicitor and South Carolina Commission of Indigent Defense.

As proof of filing for our records, I would appreciate it if one of your Clerks would clock the enclosed copies of enclosures and return it to me in the envelope I have provided. Thank you.

Sincerely,



Delfin Floresca
Paralegal for Adam Mlynarczyk

Enclosures as stated above

cc: (email only)
South Carolina Commission of Indigent Defense
Charleston County Solicitor's Office