

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Berkeley County

Deadra L. Jefferson, Circuit Court Judge  
\_\_\_\_\_

ORIGINAL  
RECEIVED  
JUN 13 2016  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JERAMY PARKS,

APPELLANT.

APPELLATE CASE NO. 2015-002050  
\_\_\_\_\_

**MOTION TO HOLD APPEAL IN ABEYANCE**  
\_\_\_\_\_

Counsel for appellant moves the Court to hold this case in abeyance pending receipt of the transcription of bench conferences during appellant's trial. The State consents to this motion. In support of this request, counsel shows:

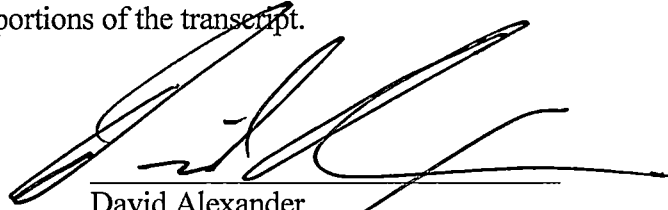
- (1) The initial brief of appellant and designation of matter in the above-referenced case is due to be filed and served with the Court on June 30, 2016.
- (2) Appellant's case was tried before the Honorable Deadra L. Jefferson and a jury on September 14-16, 2015. At trial, appellant was represented by David Schwacke and Debbie Littlejohn. Anne Williams and Debbie Herring-Lash

represented the State. Appellant was convicted of five counts of first-degree criminal sexual conduct with a minor and one count of third-degree criminal sexual conduct with a minor. Judge Jefferson sentenced appellant to a total of forty-five years' imprisonment.

- (3) During the trial, Judge Jefferson holds numerous bench conferences concerning objections and motions made by both parties. These bench conferences were not transcribed in the initial transcript received by Appellate Defense. However, Judge Jefferson states during the trial: "And so you all are aware, I don't have off-the-record conferences and so all of our bench conferences are recorded and are a part of the record." Tr. 149, ll. 22 - 25.
- (4) Appellate counsel has read the entire trial transcript and has determined that he cannot fully assess which issues to raise on appeal without a transcription of the bench conferences.
- (5) Counsel has communicated with the court reporter and learned today that the tapes of the conferences still exist. Counsel has requested that the bench conferences be transcribed.

- (6) Appellate counsel has conferred with Benjamin J. Aplin of the Attorney General's Office and the State consents to this request.

For the foregoing reasons, counsel requests that this appeal be held in abeyance pending receipt of the above-described portions of the transcript.

A handwritten signature in black ink, appearing to read 'D. Alexander', written over a horizontal line.

David Alexander  
Appellate Defender

ATTORNEY FOR APPELLANT

June 13, 2016

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Berkeley County

Deadra L. Jefferson, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

RESPONDENT,

V.

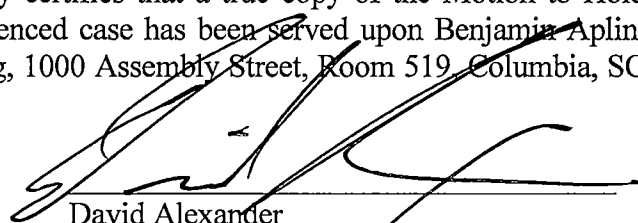
JERAMY PARKS,

APPELLANT.

APPELLATE CASE NO. 2015-002050

\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

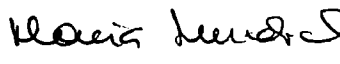
The undersigned attorney hereby certifies that a true copy of the Motion to Hold Appeal in Abeyance in the above referenced case has been served upon Benjamin Aplin, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 13th day of June, 2016.



David Alexander  
Appellate Defender

ATTORNEY FOR APPELLANT

SUBSCRIBED AND SWORN TO before me  
this 13th day of June, 2016.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: July 3, 2023.



# SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

# ORIGINAL

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Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

June 13, 2016

RECEIVED

JUN 13 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: The State v. Jeramy Parks

Dear Ms. Kitchings:

Enclosed are an original and six copies of the motion to hold appeal in abeyance in the above-captioned case. Thank you for your assistance in this matter.

Sincerely,

David Alexander  
Appellate Defender

DAA/css

Enclosure

cc: J. Benjamin Aplin, Esquire  
Mr. Jeramy Parks