

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Robert E. Hood., Circuit Court Judge

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Trial Court Case No.: 2014-GS-40-0752  
2014-GS-40-0754  
2014-GS-40-0755  
2014-GS-40-0756

Appellate Case No.: 2014-002771

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**RECEIVED**  
APR 03 2017  
SC Court of Appeals

The State, .....Respondent

v.

Trenton Barnes, ..... Appellant

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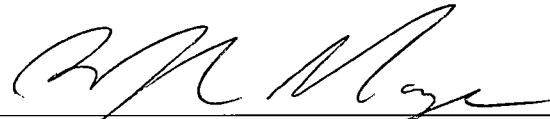
**MOTION FOR AUTHORITY TO ARGUE AGAINST PRECEDENT**

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Pursuant to Rule 217, SCACR, W. Joseph Maye, Esquire, attorney for Appellant Trenton Barnes, hereby respectfully moves this Court for leave permitting Appellant to present oral argument against the precedent held in *Crawford v. Washington*, 124 S.Ct. 1354, 158 L.Ed.2d 177, 541 U.S. 36, 42 (2004) as presented in Argument III of Brief of Appellant dated June 7, 2016.

WHEREFORE, Attorney for Appellant respectfully requests this Court grant leave to argue against precedent during the oral arguments scheduled in this matter.

ROGERS TOWNSEND & THOMAS, PC



W. Joseph Maye (S.C. Bar No.: 100851)  
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**ATTORNEY FOR APPELLANT**

March 31, 2017  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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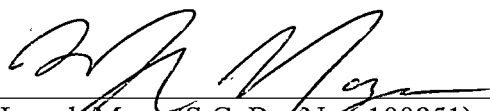
The State, .....Respondent

v.

Trenton Barnes, ..... Appellant

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true copy of the Motion for Authority to Argue Against Precedent in the above-referenced case has been served upon Susannah R. Cole, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 31<sup>st</sup> day of March, 2017.



W. Joseph Maye (S.C. Bar No.: 100851)

Appellate Defender

**ATTORNEY FOR APPELLANT**

SUBSCRIBED AND SWORN TO before me  
this 31<sup>st</sup> day of March, 2017.

*Elizabeth M. Smith* (L.S.)

Notary Public for South Carolina

My Commission Expires: March 15, 2027

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March 31, 2017

V. Claire Allen, Deputy Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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**SC Court of Appeals**

Re: **The State v. Trenton Malik Barnes**  
Lower Court Case No. 2014GS4000752, 2014GS4000754, 2014GS4000755,  
2014GS4000756  
Appellate Case No. 2014-002771

Dear Deputy Clerk Allen:

Enclosed is an original and seven (7) copies of Motion for Authority to Argue Against Precedent in the above-referenced case. Please return a clocked copy to us in the postage prepaid envelope provided.

Should you have any questions or concerns, please do not hesitate to contact us.

With kind regards, I am

Sincerely,

A handwritten signature in cursive script that reads "E.M. Smith".

Elizabeth M. Smith

Legal Assistant to William J. Maye, Esquire

/ems

Enclosures

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 **ROGERS TOWNSEND**  
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