

STATE OF SOUTH CAROLINA)
)
)
COUNTY OF DORCHESTER)
)
)
VS.)
)
John Dodge Haynes Jr.)
)
DEFENDANT)

IN THE COURT OF GENERAL SESSIONS
FIRST JUDICIAL CIRCUIT

CERTIFICATE OF MAILING

INDICTMENT #2014GS18-919
#2015GS18-711

I Glenn P. Justis, Assistant Solicitor, do hereby certify that on the 4th day of April, 2017 I served a copy of the REPLY TO DEFENSE NOTICE OF INTENT TO APPEAL on William Runyon Jr. Attorney for the Defense in this matter by mailing copies to him by way of United States Mail, with sufficient postage attached thereto and addressed as follows:

William J. Runyon Jr.
#3 Gamecock Avenue, Suite 303
Charleston, SC 29407



Glenn P. Justis, Assistant Solicitor
1st Judicial Circuit

April 4, 2017
Summerville, South Carolina

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APR 06 2017

SC Court of Appeals

STATE OF SOUTH CAROLINA)
)
COUNTY OF DORCHESTER)
)
VS.)
)
John Dodge Haynes Jr.)
)
DEFENDANT)

IN THE COURT OF GENERAL SESSIONS
FIRST JUDICIAL CIRCUIT

REPLY TO DEFENSE NOTICE
OF INTENT TO APPEAL

INDICTMENT #2014GS18-919
#2015GS18-711

TO: William Runyon, Jr. Esquire,

PLEASE TAKE NOTICE that the State would like to cite the cases of State v. Hubbard, 277 S.C. 568 (1982) and State v. Isaac, 405 S.C. 177 (2013) as controlling case law in this appeal. According to both cases, the Defense cannot appeal until sentence is imposed.



Glenn P. Justis, Assistant Solicitor
1st Judicial Circuit

April 3, 2017
Summerville, South Carolina

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SC Court of Appeals

The State of South Carolina

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First Judicial Circuit

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

Dear Ms. Kitchings:

Please find enclosed REPLY TO DEFENSE NOTICE OF INTENT TO APPEAL and CERTIFICATE OF SERVICE for filing in the above-captioned matter. Please file originals and return certified copies to me in the stamped, self-addressed envelope provided for your convenience.

Respectfully,

Glenn P. Justis
Assistant Solicitor – Dorchester County

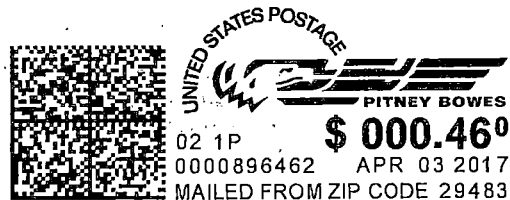
Enclosure

CC: William Runyon Jr. Esquire

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SC Court of Appeals

The State of South Carolina

OFFICE OF SOLICITOR
FIRST JUDICIAL CIRCUIT
140 NORTH MAIN STREET • SUITE 102
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The Honorable Jenny A. Kitchings
Clerk of South Carolina Court of Appeals
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