

# Law Office of Leah B. Moody, LLC

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RECEIVED

APR 10 2017

S.C. SUPREME COURT

April 6, 2017

Mr. Daniel E. Shearouse  
The Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29221

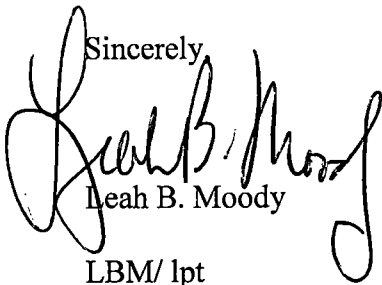
RE: Jeremy Cordera Mobley v. State of South Carolina  
Case No.: 2014-CP- 46-3296

Dear Mr. Shearouse:

The York County Court of Common Pleas appointed my office to represent Jeremy Cordera Mobley in his Post-Conviction Relief action. Please find enclosed for filing the original and two (2) copies of the Notice of Appeal and Proof of Service in the above-referenced case. Please return the clocked copies to me in the enclosed self-addressed, stamped envelope. Also enclosed is a copy of the Order Dismissing Post-Conviction Relief Application.

Thank you for your assistance with this matter.

Sincerely,



Leah B. Moody

LBM/ lpt

Enclosures

Cc Jeremy Mobley  
Justin Hunter, Esq.  
David Hamilton, Clerk of Court, York County  
Sharon Graham, SCCID

IN THE STATE OF SOUTH CAROLINA  
In The Supreme Court

RECEIVED

APR 10 2017

APPEAL FROM YORK COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

Honorable J. Ernest Kinard, Jr., Presiding in York County  
Honorable John C. Hayes, III, Presiding in York County

Case No. 2014-CP-46-03296

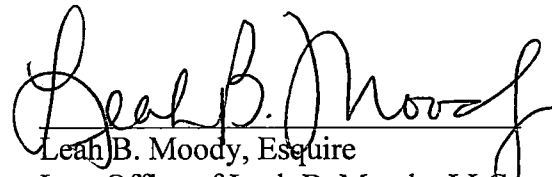
Jeremy Cordera Mobley, ..... Appellant,

v.

State of South Carolina, ..... Respondent.

NOTICE OF APPEAL

Jeremy Cordera Mobley appeals the order of the Honorable J. Ernest Kinard, Jr., dated March 16, 2017 and mailed on March 21, 2017. Appellant received written notice of entry of the final order on March 24, 2017



Leah B. Moody, Esquire  
Law Office of Leah B. Moody, LLC  
235 E. Main Street, Suite 115  
Post Office Box 1015  
Rock Hill, South Carolina 29731

Other Counsel of record:  
Justin Hunter, SC Attorney General's Office  
Attorney for Respondents  
Rembert C. Dennis Building  
Post Office Box 11549  
Columbia, South Carolina 29211-1549  
(803) 734-3970

IN THE STATE OF SOUTH CAROLINA  
In The Supreme Court

RECEIVED

APR 10 2017

S.C. SUPREME COURT

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

Honorable J. Ernest Kinard, Jr., Presiding in York County  
Honorable John C. Hayes, III, Presiding in York County

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Case No. 2014-CP-46-03296

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Jeremy Cordera Mobley, ..... Appellant,

v.

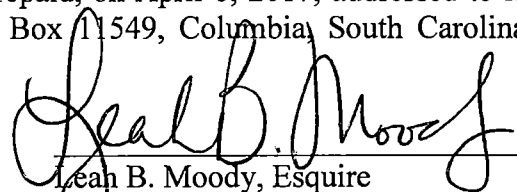
State of South Carolina, ..... Respondent.

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PROOF OF SERVICE

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I certify that I have served the Notice of Appeal on Justin Hunter by depositing a copy of it in the United States Mail, postage prepaid, on April 6, 2017, addressed to its attorney of record, Justin Hunter, Post Office Box 11549, Columbia, South Carolina, 29211-1549.



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April 6, 2017

Cc Jeremy Cordera Mobley  
Justin Hunter, Esq.  
David Hamilton, Clerk of Court, York County  
Sharon Graham, SCCID

**FORM 4**

**STATE OF SOUTH CAROLINA  
COUNTY OF YORK  
IN THE COURT OF COMMON PLEAS**

**JUDGMENT IN A CIVIL CASE  
CASE NUMBER 2014CP4603296**

Jeremy Cordera Mobley

South Carolina State of

**PLAINTIFF(S)**

**DEFENDANT(S)**

Submitted by:

Attorney for:  Plaintiff  Defendant  
 Self-Represented Litigant

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.  See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):**
  - Rule 12(b), SCRPC;
  - Rule 41(a), SCRPC (Vol. Nonsuit);
  - Rule 43(k), SCRPC (Settled);
  - Other: \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):**
  - Rule 40(j) SCRPC;
  - Bankruptcy;
  - Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
  - Other: \_\_\_\_\_
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
  - Affirmed;
  - Reversed;
  - Remanded;
  - Other:

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order; (formal order to follow)  Statement of Judgment by the Court:

**ORDER INFORMATION**

This order  ends  does not end the case.

Additional Information for the Clerk: **ORDER OF DISMISSAL**

**INFORMATION FOR THE JUDGMENT INDEX**

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk.

**Note:** Title abstractors and researchers should refer to the official court order for judgment details.

**E-Filing Note:** In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

s/ John C. Hayes, III.

2049

3/16/2017

John C. Hayes, III.

Judge Code

Date

Circuit Court Judge

**For Clerk of Court Office Use Only**

This judgment was entered on March 21, 2017, and a copy mailed first class or placed in the appropriate attorney's box on March 21, 2017, to attorneys of record or to parties (when appearing pro se) as follows:

Leah B. Moody 235 E. Main St., Ste 115 PO Box 1015 Rock Hill, SC 29730

Justin James Hunter PO Box 11549 Columbia, SC 29211-1549

---

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

David Hamilton

Court Reporter

David Hamilton - Clerk of Court

---

Court Reporter:

**E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.**

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**ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.**

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

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STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF YORK )  
 )  
 Jeremy Mobley, )  
 S.C.D.C. No. 357960, )  
 )  
 Applicant, )  
 )  
 v. )  
 )  
 State of South Carolina, )  
 )  
 Respondent. )

IN THE COURT OF COMMON PLEAS  
 OF THE SIXTEENTH JUDICIAL CIRCUIT

2014-CP-46-3296

ORDER OF DISMISSAL

FILED-RECEIVED  
 2017 MAR 21 AM 11:27  
 DAVID HAMILTON  
 S.C.C.P. & GS  
 YORK COUNTY, SC

This matter comes before the Court by way of an Application for Post-Conviction Relief (PCR) filed October 6, 2014. Respondent made its Return on or about January 14, 2015. An evidentiary hearing into the matter was convened on April 15, 2015, at the Moss Justice Center in York, South Carolina before the Honorable J. Ernest Kinard, Jr. Applicant was present at the hearing and represented by Leah Moody, Esquire. J. Rutledge Johnson, Esquire, of the South Carolina Attorney General's Office represented the Respondent. At the hearing, Applicant testified on his own behalf. Michael Matthews, Esquire, also testified. This Court also had before it a copy of the records of the York County Clerk of Court regarding the subject convictions, Applicant's records from the South Carolina Department of Corrections, the Return, the plea transcript, and the transcript from the hearing before Judge Kinard.

The undersigned, pursuant to Rule 63 SCRCPP, assigned this case to himself due to the death of Judge Kinard prior to his issuing an order in the case. The tardiness of this order is not due to fault of the undersigned, but rather the lapse of time before the hearing transcript was provided to the undersigned. The transcript was received by the undersigned March 8, 2017.

## I. PROCEDURAL HISTORY

Applicant is presently confined in the South Carolina Department of Corrections pursuant to orders of commitment of the York County Clerk of Court. Applicant was charged with Hit and Run with Great Bodily Injury. Michael Matthews, Esquire, (hereinafter "Counsel") represented him. On November 19, 2013, the Applicant waived presentment of this charge to the grand jury and pled guilty before the Honorable J. Mark Hayes, II. He was sentenced to imprisonment for ten years on the charge.

A notice of appeal was filed on Applicant's behalf but the South Carolina Court of Appeals dismissed his appeal for failure to comply with SCACR Rule 203. The Remittitur was issued on August 25, 2014.

### Allegations

In his application, Applicant alleges he is being held in custody unlawfully for the following reasons:

1. "Counsel, Mr. Michael Matthews failed to send all documents in time for appeal."
  - a. "Letter from South Carolina Court of Appeals stating Counsel failed to comply with Rule 203(d)(1)(B)(iv) of the South Carolina Appellate Court Rules and my case was dismissed"
2. "Conflicting statements from me and codefendant"
3. "My attorney and solicitor agreed on a cap of 5 years"
  - a. "I signed an agreement for a plea of a 5 year cap"
  - b. "Attorney and solicitor had different statements in the case"

## II. SUMMARY OF EVIDENCE PRESENTED AT PCR HEARING

### Applicant's Testimony

Applicant testified that he met with Counsel four times before his plea to discuss his case. He testified that they discussed the consequences of pleading guilty versus going to trial. He testified that they discussed that if he went to trial, he would face up to ten years on the charge.

Applicant testified Counsel negotiated a plea offer of a cap of five years, which was the State's last offer. He testified that he would have taken the case to trial, but wanted to accept the cap of five years. He testified that he pled guilty before Judge Hayes and was told to say "yes sir" to every question. Applicant testified that he understood the plea to be a cap of five years but the plea judge said he could go over five. He testified that Counsel said he could get no more than five years but he received ten years. Applicant testified that he thought he would get less time because of Counsel's advice. Applicant further testified that part of his plea hearing included a probation violation, where Applicant received ten years.

Applicant testified that he talked with Counsel after the plea and Counsel said they could appeal it. He testified that his appeal was dismissed because Counsel did not submit a Rule 203 explanation.

Applicant testified that he signed the plea affidavit, included next to the box that explains that the type of plea is a recommendation of a cap of five years.

#### **Counsel Mike Matthews's Testimony**

Counsel testified that he was retained to represent Applicant. He testified that there were issues about who was driving the vehicle. He testified that he and Applicant talked about the pros and cons of pleading guilty versus going to trial based on the investigation. Counsel testified that the solicitor would not negotiate a plea at first, but he was able to work out a plea deal. Counsel testified that he reviewed the plea affidavit with Applicant, one page at a time, and Applicant initialed each box the same day that he pled guilty.

Counsel testified that the offer was originally ten years suspended to a cap of five years. He testified that the ultimate offer was a recommended cap of five years. Counsel testified that usually local judges treat caps as negotiations that he did not think that a cap would be an issue.

with Judge Hayes. Counsel further testified that both he and the State argued for a cap of five years but Judge Hayes said that he disagreed with both parties and sentenced Applicant to the full ten years.

Counsel testified that he filed the notice of appeal but the Court of Appeals dismissed it pursuant to SCACR 203(d)(1)(B)(iv) because of a lack of proper paperwork. He testified that the appeal was not perfected.

### III. APPLICABLE LAW

In a post-conviction relief action, the Applicant bears the burden of proving the allegations in their application. Butler v. State, 286 S.C. 441, 334 S.E.2d 813 (1985). Where the application alleges ineffective assistance of counsel as a ground for relief, the Applicant must prove that "counsel's conduct so undermined the proper functioning of the adversarial process that the trial cannot be relied upon as having produced a just result." Strickland v. Washington, 466 U.S. 668, 104 S. Ct. 2052, 2064, 80 L.Ed.2d 674, 692 (1984); Butler, 334 S.E.2d 813.

The proper measure of performance is whether the attorney provided representation within the range of competence required in criminal cases. The courts presume that counsel rendered adequate assistance and made all significant decisions in the exercise of reasonable professional judgment. Strickland, 466 U.S. 668. Applicant must overcome this presumption in order to receive relief. Cherry v. State, 300 S.C. 115, 386 S.E.2d 624 (1989).

Courts use a two-pronged test in evaluating allegations of ineffective assistance of counsel. Id. at 117, 386 S.E.2d at 625. First, the applicant must prove counsel's performance was deficient. Id. Under this prong, courts measure an attorney's performance by its "reasonableness under prevailing professional norms." Id. (citing Strickland, 466 U.S. at 688). Second, any deficient performance must have prejudiced the applicant such that "there is a reasonable probability that,

but for counsel's unprofessional errors, the result of the proceeding would have been different." Id. at 117-18, 386 S.E.2d at 625. With respect to guilty plea counsel, the Applicant must show there is a reasonable probability that, but for counsel's alleged errors, he would not have pled guilty and would have insisted on going to trial. Hill v. Lockhart, 474 U.S. 52, 59 (1985).

#### IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

This Court has reviewed the testimony presented at the evidentiary hearing, observed the witnesses presented at the hearing, passed upon their credibility, and weighed the testimony accordingly. Further, this Court has reviewed the Clerk of Court records regarding the subject convictions, the guilty plea transcript, Applicant's records from the South Carolina Department of Corrections, the application for post-conviction relief, and the legal arguments made by the attorneys. Pursuant to S.C. Code Ann. § 17-27-80 (2003), this Court makes the following findings of fact based upon all of the probative evidence presented.

As a matter of general impression, this Court finds Applicant's testimony and assertions to be not credible. In contrast, this Court finds Counsel's testimony to be credible and persuasive on all matters. These credibility findings have been applied to the Court's findings and conclusions set forth below.

##### **Ineffective Assistance of Counsel**

Applicant alleges Counsel was ineffective regarding his guilty plea. This Court finds that Applicant failed to meet his burden of proving that his plea counsel was ineffective. This Court finds Applicant's attorney demonstrated the normal degree of skill, knowledge, professional judgment, and representation that are expected of an attorney who practices criminal law in South Carolina. State v. Pendergrass, 270 S.C. 1, 239 S.E.2d 750 (1977); Strickland, 466 U.S. at 668; Butler, 286 S.C. 441, 334 S.E.2d 813.

An applicant who pleads guilty on the advice of counsel may collaterally attack the plea only by showing that (1) counsel was ineffective and (2) there is a reasonable probability that but for counsel's errors, the applicant would not have pled guilty and would have insisted on going to trial. Roscoe v. State, 345 S.C. 16, 20, 546 S.E.2d 417, 419 (2001) (citations omitted). An applicant alleging his guilty plea was induced by ineffective assistance of counsel must prove that counsel's advice was not "within the range of competence demanded of attorneys in criminal cases." Hill v. Lockhart, 474 U.S. 52, 56, 106 S. Ct. 366, 369 (1985). To find a guilty plea is voluntarily and knowingly entered into, the record must establish the defendant had a full understanding of the consequences of his plea and the charges against him. Boykin v. Alabama, 395 U.S. 238, 89 S. Ct. 1709, 23 L.Ed.2d 274 (1969).

This Court finds that the plea waiver form, signed and initialed by Applicant, clearly states that Applicant was agreeing to plead guilty to hit and run with great bodily injury, and that the offense carries a sentence ranging from thirty days to ten years imprisonment. The waiver form explains that the State was making a recommendation of a cap of five years. Applicant also initialed the box which stated that the Judge is not required to accept the recommendation given by the solicitor and may accept it, sentence below the recommendation, or sentence above the recommendation. Furthermore during the plea hearing, the following colloquy took place between Judge Hayes and Applicant:

THE COURT: Now, sir, do you understand that I'm not bound by recommendation that's made by the state?

APPLICANT: Yes, sir.

THE COURT: And that today I could sentence you up to 10 years on this charge?

APPLICANT: Yes, sir, I understand.

THE COURT: And you still wish to enter this plea?

APPLICANT: Yes, sir.

Trial Transcript, p. 9, ll. 4-11.

Additionally, Judge Hayes asked Applicant if anyone had made him any promises in order to get him to plead guilty and Applicant responded in the negative. Trial Transcript, p. 5, ll. 4-7.

This Court finds Counsel's testimony credible that he reviewed the plea affidavit with Applicant and that he argued for mercy on Applicant's behalf. This Court finds that Applicant's desire to receive a sentence of ten years does not change the fact that he was well informed from Counsel, the plea waiver form, and the plea judge that he was pleading to a charge that carried thirty days to ten years. See Wolfe v. State, 485 S.E.2d 367, 371, 326 S.C. 158, 165 (1997) (Wishful thinking regarding sentencing does not equal a misapprehension concerning the possible range of sentences, especially where one acknowledges on the record that one knows the range of sentences and that no promises have been made). This Court also finds that Applicant was well aware that the plea judge did not have to accept the State's recommendation. See State v. Riddle, 278 S.C. 148, 150, 292 S.E.2d 795, 796 (1982) ("Further, when the State fulfills its agreement to recommend a specific sentence, the fact that the judge does not accept the recommendation does not affect the validity of the plea."). This Court finds that Counsel was not ineffective regarding his advice for Applicant to plead guilty because Counsel argued for the plea judge to accept the State's recommendation.

Furthermore, this Court finds that Applicant has failed to show that he was prejudiced by Counsel's actions because Applicant has failed to show that he otherwise would have elected to go to trial, and has not shown any error in Counsel's assistance that led him to plead guilty instead. Therefore he cannot prove any prejudice. Accordingly, this allegation is denied and dismissed with prejudice.

Applicant also alleges that Counsel was ineffective for failing to perfect his direct appeal. This Court finds that Counsel filed the notice of appeal but the appeal was ultimately dismissed for failure to follow Appellate Court Rule 203(d)(1)(B)(iv), which requires that an appeal from an Alford plea be accompanied by "a written explanation showing that there is an issue which can be reviewed on appeal." The Rule states that the "explanation should identify the issue(s) to be raised on appeal and the factual basis for the issue(s) including how the issue(s) was raised below and the ruling of the lower court on that issue(s)." Rule 203 SCACR.

This Court finds that Counsel was deficient for not filing the Rule 203(d)(1)(B)(iv) letter since he was required by the Appellate Court rules to do so and because the Court of Appeals subsequently instructed him to file the letter. However, this Court finds that Applicant has failed to show that he was prejudiced by Counsel's deficiency. This Court finds that Applicant was well informed of the consequences of his plea through discussions with Counsel, the initialed and signed plea waiver form, and his colloquy with the plea judge. A review of the plea transcript shows that Applicant did not raise any issues or concerns or make objections at any point during the plea hearing. Applicant has not shown that any specific issue was raised and ruled upon at the plea hearing or would be otherwise preserved for direct appeal. Accordingly, Applicant has failed to meet his burden of showing that he was prejudiced by Counsel's actions, and this allegation must be dismissed.

#### **Involuntary Guilty Plea**

To the extent that Applicant alleges that his plea was given involuntarily, this Court finds this allegation must be dismissed. To find a guilty plea is voluntarily and knowingly entered into, the record must establish the defendant had a full understanding of the consequences of his plea and the charges against him. Boykin v. Alabama, 395 U.S. 238, 89 S. Ct. 1709, 23 L.Ed.2d 274

(1969). Defendant's knowing and voluntary waiver of statutory or constitutional rights must be established by a complete record, and "may be accomplished by colloquy between court and defendant, between court and defendant's counsel, or both." Roddy v. State, 339 S.C. 29, 34, 528 S.E.2d 418, 421 (2000) (citing State v. Ray, 310 S.C. 431, 437, 427 S.E.2d 171, 174 (1993)). A guilty plea is a solemn, judicial admission of the truth of the charges against an individual; thus, a criminal inmate's right to contest the validity of such a plea is usually, but not invariably, foreclosed. Dalton v. State, 376 S.C. 130, 137-38, 654 S.E.2d 870, 874 (Ct. App. 2007) (citing Blackledge v. Allison, 431 U.S. 63, 97 S. Ct. 1621, 52 L.Ed.2d 136 (1977)). Therefore, statements made during a guilty plea should be considered conclusive unless a criminal inmate presents valid reasons why he should be allowed to depart from the truth of his statements. Crawford v. United States, 519 F.2d 347 (4th Cir.1975).

This Court finds, and the record reflects, Applicant was fully advised that he was pleading guilty and therefore waiving any challenges to the evidence against him. The plea court's thorough colloquy with Applicant demonstrates that he understood the consequences of pleading guilty and the potential sentence he could receive. Applicant presented no credible evidence as to why he should be able to depart from his statements at the plea hearing. This Court finds credible Counsel's testimony regarding his preparation and advice concerning the case. The record reflects Applicant fully admitted his guilt to the plea court and agreed with the State's version of the facts. See Trial Transcript, p. 9, ll. 1-3, 12-15. "A guilty plea constitutes a waiver of nonjurisdictional defects and claims of violations of constitutional rights." Jamison v. State, 410 S.C. 456, 467, 765 S.E.2d 123, 129 (2014) (citing State v. Rice, 401 S.C. 330, 331-32, 737 S.E.2d 485, 485-86 (2013); Hyman v. State, 397 S.C. 35, 44, 723 S.E.2d 375, 379 (2012)). Notably the South Carolina Supreme Court has held "[a] guilty plea represents a break in the chain of events which has preceded it in the

criminal process." Id. (citations omitted). "When a criminal defendant has solemnly admitted in open court that he is in fact guilty of the offense with which he is charged, he may not thereafter raise independent claims relating to the deprivation of constitutional rights that occurred prior to the entry of the guilty plea." Id. (citing Rice, 401 S.C. at 332, 737 S.E.2d at 486). After a full review of the guilty plea transcript, this Court finds the plea judge correctly found Applicant's plea was freely, voluntary, and intelligently made. Additionally, this Court finds that the plea judge's rejection of the State's recommendation does not affect the voluntariness of Applicant's plea. See Lambert v. State, 260 S.C. 617, 621, 198 S.E.2d 118, 119-20 (1973) (holding that the voluntariness of the defendant's plea was not affected when the court did not accept the solicitor's recommendation). Accordingly, this allegation must be dismissed.

#### **All Other Allegations**

As to any and all allegations that were raised in the application or at the hearing in this matter and not specifically addressed in this Order, this Court finds Applicant failed to present any testimony, argument, or evidence at the hearing regarding such allegations. Accordingly, this Court finds Applicant has abandoned any such allegations.

#### **V. CONCLUSION**

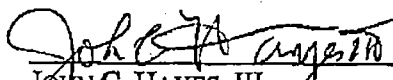
Based on the foregoing, the Court finds and concludes Applicant has not established any constitutional violations or deprivations that would require this Court to grant his application. Applicant failed to demonstrate counsels' performance was unreasonable under prevailing professional norms. Cherry, 300 S.C. at 117-18, 386 S.E.2d at 625; Stalk v. State, 383 S.C. 559, 563, 681 S.E.2d 592, 594 (2009). Therefore, this application for post-conviction relief must be denied and dismissed with prejudice.

The Court notes Applicant must file and serve a notice of appeal within thirty (30) days from PCR counsel's receipt of written notice of entry of judgment to secure the appropriate appellate review. See Rule 203, SCACR. Pursuant to Austin v. State, 305 S.C. 453, 409 S.E.2d 395 (1991), Applicant has a right to appellate counsel's assistance in seeking review of the denial of post-conviction relief. Rule 71.1(g), SCRPC, provides that if Applicant wishes to seek appellate review, PCR counsel must serve and file a notice of appeal on Applicant's behalf. Applicant is directed to South Carolina Appellate Court Rule 243 for appropriate procedures for appeal.

**IT IS THEREFORE ORDERED THAT:**

1. The application for Post-Conviction Relief is denied and dismissed with prejudice; and
2. Applicant will remain in the custody of the South Carolina Department of Corrections to complete service of his sentence.

AND IT IS SO ORDERED this 16<sup>th</sup> day of March, 2016.

  
JOHN C. HAYES, III  
Presiding Judge  
Sixteenth Judicial Circuit H/11

V. J. H., South Carolina

# Law Office of Leah B. Moody, LLC

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April 6, 2017

Sharon Graham  
SC Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11433  
Columbia, South Carolina 29211-1433

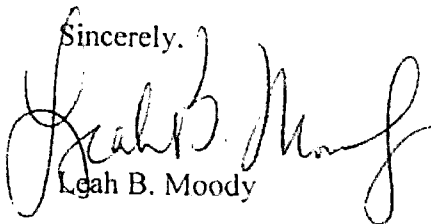
RE: Jeremy Cordera Mobley v. State of South Carolina  
Case No.: 2014-CP-46-03296

Dear Ms. Graham:

The York County Court of Common Pleas appointed my office to represent Jeremy Cordera Mobley in his Post-Conviction Relief action. Please find enclosed a copy of the Notice of Appeal and Proof of Service in this matter.

If you have any questions or concerns, please feel free to contact my office. Thank you.

Sincerely,



Leah B. Moody

LBM/lpt

Enclosures

Cc Jeremy Cordera Mobley  
Justin Hunter, Esq.  
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David Hamilton, Clerk of Court, York County

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April 6, 2017

Justin Hunter, Esquire  
South Carolina Attorney General's Office  
Post Office Box 11549  
Columbia, South Carolina 29211

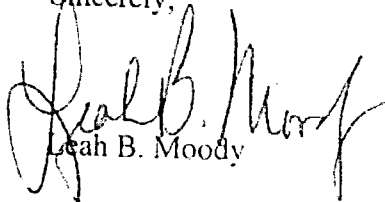
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April 6, 2017

The Honorable David Hamilton  
York County Clerk of Court  
Post Office Drawer 649  
York, South Carolina 29745

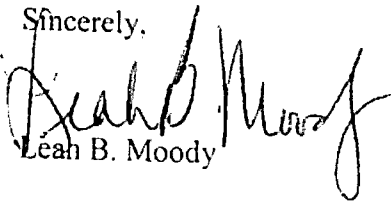
RE: Jeremy Cordera Mobley v. State of South Carolina  
C.A. No.: 2014-CP-46-03296

Dear Mr. Hamilton:

The York County Court of Common Pleas appointed my office to represent Jeremy Mobley in his Post-Conviction Relief action. Please find enclosed a copy of the Notice of Appeal and Proof of Service in this matter.

If you have any questions or concerns, please feel free to contact my office. Thank you.

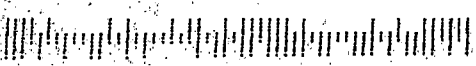
Sincerely,

  
Leah B. Moody

LBM/lpt

Enclosures

cc Jeremy Mobley  
Justine Hunter, Esq.  
Daniel E. Shearouse, Clerk of Court, South Carolina Supreme Court  
Sharon Graham, SCCID



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The Supreme Court of South Carolina  
PO Box 11330  
Columbia SC 29211-1330