

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

**The State,**

**Respondent,**

v.

**John Dodge Haynes,**

**Appellant.**

**Appellate Case No.: 2017-000799**

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**Response to Letter  
Filed by Attorney General**

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APR 25 2017

**SC Court of Appeals**

Now comes the Appellant and shows unto this Honorable Court as follows:

1. That the Court of Appeals is vested with authority to issue writs under Article V of the South Carolina Constitution and the Legislation promulgated there under establishing the Courts of Appeals. Please see Article V South Carolina Constitution; **Title 14-8-200 Code of Laws of S.C. 1976 as Amended.**
2. That should this Honorable Court feel that they are not vested with authority to issue an “extraordinary writ” this Appellant would seek to have an order transferring this matter to the Supreme Court pursuant to **Title 14-8-260 and 14-8-200 (b) Code of S.C. Code of Laws of S.C. 1976 as Amended.**
3. That the only application process for a writ other than habeas corpus as it not stands in South Carolina is by the “appeal” process.

**WHEREFORE** the Appellant prays as follows:

1. For the Order of Dismissal to be reversed and this application heard.
2. Alternatively, for an Order of Dismissal specifically holding that the Court of Appeals is without jurisdiction to issue writs and dismiss with the Appellant having his Certiorari

Rights under Rule 221 to the South Carolina Supreme Court or alternatively issue an order transferring the matter to the Supreme Court pursuant to **Title 14-8-260 and 14-8-200 Code of Laws of S.C. 1976 as Amended.**

**William L. Runyon, Jr., Esquire**  
**Eric Laquiere, Esquire**

By: 

**William L. Runyon, Jr., Esquire**  
#3 Gamecock Avenue, Suite 303  
Charleston, SC 29407  
(843)571-3515  
SC Bar No: 4838

Dated this 24<sup>th</sup> day of April, 2017  
in Charleston, South Carolina.

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In The Court of Appeals**

**The State,**

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**Certificate of Mailing**

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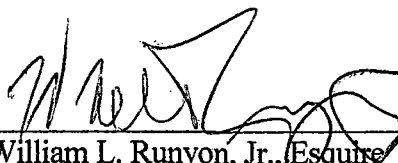
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APR 25 2017  
SC Court of Appeals

I William L. Runyon, Jr., Esquire, do hereby certify that on the 24<sup>th</sup> day of April, 2017, I served a copy of the **RESPONSE TO LETTER FILED BY ATTORNEY GENERAL** on South Carolina Senior Assistant Deputy Attorney General J. Benjamin Aplin, Assistant Solicitor Glenn Justis and Honorable Robert M. Dudek in the within matter, by mailing copies to them by way of the United States Mail, with sufficient postage attached thereto and addressed as follows:

Honorable J. Benjamin Aplin  
S.C Asst. Deputy Attorney General  
100 Assembly Street  
Columbia, SC 29201

Honorable Glenn Justis  
Assistant Solicitor for Dorchester County  
140 N. Main Street, Suite 102  
Summerville, SC 29483

Honorable Robert Dudek  
S.C. Commission on Indigent  
P.O. Box 11589  
Columbia, SC 29211

  
\_\_\_\_\_  
William L. Runyon, Jr., Esquire  
#3 Gamecock Avenue, Suite 303  
Charleston, SC 29407  
SC Bar No.: 4838  
(843) 571-3515

Dated this 24<sup>th</sup> day of April, 2017  
in Charleston, South Carolina.

# William L. Runyon, Jr.

Attorney At Law

#3 Gamecock Avenue, Suite 303

Charleston, SC 29407

Telephone: (843) 571-3515 Facsimile: (843) 766-5085

April 24, 2017

Honorable Jenny A. Kitchings  
Clerk of South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC, S.C. 29211

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APR 25 2017

SC Court of Appeals

RE: State, Respondent v. John Dodge Haynes, Appellant.  
Appellate Case No.: 2017-000799

Dear Ms. Kitchings:

Please find enclosed **RESPONSE TO LETTER FILED BY ATTORNEY GENERAL** 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.

Sincerely,



William L. Runyon, Jr.

WLR, JR. /bb

Enclosure

Cc: Honorable Senior Assistant Attorney General J. Benjamin Aplin  
Honorable Solicitor Glenn Justis  
Honorable Robert M. Dudek

Expected Delivery Day: 04/26/2017

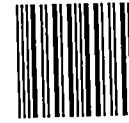
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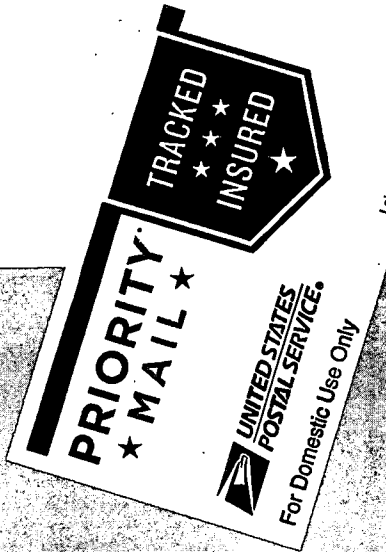
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Columbia, SC, S.C. 29211



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