

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

R. Markely Dennis, Jr. Circuit Court Judge

Case No: 2013-CP-08-2002

The State,

Respondent,

v.

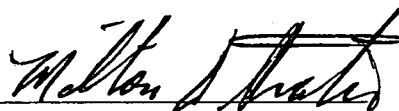
Jami Morse,

Appellant.

RECEIVED
JUN 05 2017
SC Court of Appeals

MOTION TO PROHIBIT RESPONDENT FROM ARGUING AGAINST PRECEDENT

Appellant herein moves to prohibit Respondent from arguing against the precedent that has been established on the time period for the State has to timely file an appeal. Respondent has not otherwise complied with Rule 217 of the South Carolina Rules of Appellate Procedure; pursuant to motion in accordance with Rule 240 filed at least fifteen (15) days prior to oral argument.



Milton D. Stratos
Attorney for Appellant
1041 Johnnie Dodds Blvd, Suite 14A
Mount Pleasant, SC 29464
(843)345-5810
Milton@Stratoslaw.com

Other Counsel of Record
Catherine Fan
Assistant General Counsel
SC Department of Public Safety
P. O. Box 1993
Blythewood, SC 29016
Attorney for Respondent