

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY
William P. Keesley, Circuit Court Judge
Appellate Case No. 2017-002283

RECEIVED
JAN 04 2018
SC Court of Appeals

THE STATE,

v.

Respondent,

PERRY DRAKE GILMORE JR.,

Appellant.

REPLY TO RETURN TO MOTION TO ENLARGE TIME

Appellant replies to Respondent's Return to Motion to Enlarge Time as follows:

1. I corrected deficiencies, so Respondent's motion should be denied as moot;
2. This court issued an order holding the order to correct in abeyance pending the court's decision as to my request for counsel, so Respondent's motion should be denied;
3. What may be "straightforward" to him, a "lawman," may not be to me, a "layman";
4. Just because someone knows how to file a "motion" doesn't necessarily mean they know how to effectively enough file a "notice of appeal"; there's a difference;
5. I don't have a transcript of my plea hearings & don't have the money to pay for them (see account info attached to motion to Enlarge Time) to give me reference to "sufficiently" repeat everything that was said & done below. An attorney can get this for free & refer to such for an accurate recount;
6. I don't have the knowledge of/easy access to law that a lawyer has to be able to sufficiently research & gather all the law I may need to support my notice of appeal; and
7. That my notice of appeal was/is deficient proves that filing such wasn't so "straightforward" to me, I didn't possess "sufficient" knowledge to "fully effective" in filing it, & I obviously need effective assistance of counsel to do so.

Wherefore, I respectfully request Respondent's Return be denied & my Motion's for Counsel & to Enlarge Time be granted.

[Declaration, Proof of Service, & signature block on next page]

I, Perry Drake Gilmore Jr., swear under penalty of perjury above is true & correct & I'm over the age of 18 & am of sound mind. The date & my signature are below.

PROOF OF SERVICE

This proves I this day served a copy of this on Respondent via mail.

December 20, 2017
Ridgeland, South Carolina

Respectfully,

s/p Gil

Perry Gilmore #344879
P.O. Box 2039
Ridgeland, SC 29936
(APPELLANT)

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SC Court of Appeals

REF: State v. Perry Drake Gilmore Jr. Appellate Case No. 2017-002283

Dear Clerk:

Please find enclosed for filing in aboverferenced case my
Reply To Return To Motion To Enlarge Time.

Respectfully,

CC: J. Benjamin Aplin, Interim Senior
Assistant Deputy Attorney General

s/ Perry Gilmore

Perry Gilmore 344879
P.O. Box 2039
Ridgeland, SC 29936
(APPELLANT) (PRO SE)

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SC Court of Appeals

December 20, 2017
Ridgeland, South Carolina

Perry Gilmore 344879
P.O. Box 2039, RCI BA-45
Ridgeland, SC 29936

Ridgeland Correctional
Institution

LEGAL MAIL

Mailroom

Jenny Abbott Kitchings
Clerk of Court
Court of Appeals
P.O. Box 11629
Columbia, SC

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SC Court of Appeals

**RIDGELAND CORRECTIONAL
INSTITUTION**

DEC 27 2017

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