

ORIGINAL

STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-002379

Ronald Coulter, #300410,

Appellant,

v.

State of South Carolina,

Respondent.

FINAL REPLY BRIEF

Ronald Coulter, #300410

BRCI Wateree 195

4460 Broad River Road

Columbia, SC 29210

Appellant, Pro Se

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ARGUMENT

I. THE ARGUMENTS SUBMITTED BY THE RESPONDENT ARE INSUFFICIENT TO FACE THE STATEMENT OF ISSUES AS PRESENTED IN THE APPELLANT'S INITIAL BRIEF ON APPEAL.

The Respondent has attempted to diminish the nature of the Appellant's Fourteenth Amendment due process claims raised on appeal by truncated quotations from the Appellant's supporting arguments contained within his original petition for state habeas corpus. The Respondent contends that the Appellant raised the following claims to the lower court: 1) whether the state PCR court improperly adjudicated his Sixth Amendment ineffectiveness claims; and, 2) whether his PCR counsel rendered inadequate representation during his PCR proceeding.

Every ground of appeal ought to be so distinctly stated that the courts may at once see the point which it is called upon to decide without having to "grope in the dark" to ascertain the precise point at issue. Brady v. Brady, 72 S.E.2d 193 (1952), Hewitt v. Reserve Life Ins. Co., 110 S.E.2d 852 (1959), Fruehauf Trailer Co. v. McElmurray, 113 S.E.2d 756 (1960), Winter v. U.S. Fidelity & Guaranty Co., 126 S.E.2d 724 (1962), Shell v. Brown, 134 S.E.2d 214 (1963), Solley v. Weaver, 146 S.E.2d 164 (1966), Boyer v. Loftin-Woodard, Inc., 146 S.E.2d 606 (1966).

The arguments presented in the Brief of Respondent do not address the issues which are clearly stated on appeal; therefore, the Respondent's arguments are without merit.

CONCLUSION

Based on the claims and arguments advanced in the Initial Brief of Appellant, it is respectfully submitted that this Court should reverse the lower court's dismissal of the Appellant's Petition for Writ of State Habeas Corpus.

Date: October 3, 2016

Respectfully submitted,

Ronald Coulter

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