THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM THE COUNTY OF Horry

Court of Common Pleas

The Honorable Circuit Court Judge, William H. Seals, Jr.

Case No. 2015-CP-26-07825

Nehemiah J. Evans, SCDC # 295717 ..... Petitioner,

v.

State of South Carolina, ...Respondent.

NOTICE OF APPEAL

The Petitioner appeal the Honorable William H. Seals Jr.'s Order filed on February 28, 2018, 2018, denying post conviction relief to the Petitioner.

The Order was received by the undersigned counsel on March 21, 2018. A copy of the said Order on appeal is attached to this Notice.

This is the 24th day of March, 2018.

Steven W. Fowler
Fowler Law Firm
730 Main Street, Unit 237
North Myrtle Beach, SC 29582
Telephone: 843-663-0006
Fax: 843-280-0003
myfowlerlaw@gmail.com
SC Bar #69683

THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM THE COUNTY OF Horry

Court of Common Pleas

The Honorable Circuit Court Judge, William Seals

Case No. 2015-CP-26-07825

Nehemiah J. Evans, SCDC # 295717 ..... Petitioner,

v.

State of South Carolina, ...Respondent

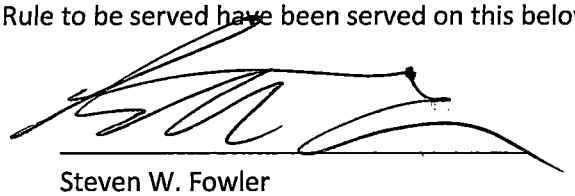
PROOF OF SERVICE

I, Steven W. Fowler, court- appointed attorney for Petitioner, certify that I have today served within Notice of Appeal and Copy of the Order signed by the presiding Judge upon the Respondent by depositing a copy of it in the United States Mail, postage prepaid, addressed to the following:

1) Assistant Attorney General, PO Box 11549, Columbia, SC 29211 and
2) Clerk of the South Carolina Supreme Court , 1231 Gervais St, Columbia, SC 29201

I further certify that all parties required by Rule to be served have been served on this below named date.

This is the 24th day of March, 2018.



Steven W. Fowler
Fowler Law Firm
730 Main Street, Unit 237
North Myrtle Beach, SC 29582
Telephone: 843-663-0006
Fax: 843-280-0003
myfowlerlaw@gmail.com
SC Bar #69683

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF HORRY	)	
Nehemiah J. Evans, S.C.D.C. No. 295717,	)	Case No.: 2015-CP-26-07825
Applicant,	)	**ORDER OF DISMISSAL**
v.	)	
State of South Carolina,	)	
Respondent.	)	

This matter comes before the Court by way of an application for post-conviction relief filed by Nehemiah J. Evans ("Applicant") on November 2, 2015. Respondent made its return on or about November 30, 2016. The Court convened an evidentiary hearing into the matter on Wednesday, November 29, 2017, at the Horry County Courthouse in Conway, South Carolina. Applicant was present at the hearing and represented by Steven W. Fowler, Esq. Johnny Ellis James Jr., of the South Carolina Attorney General's Office, represented Respondent.

Applicant testified on his own behalf at the evidentiary hearing. Applicant's plea counsel, Kenneth B. Massey, Esq. ("Counsel") also testified. The Court had before it Applicant's records from the South Carolina Department of Corrections, a copy of the original plea and sentencing transcripts, the records of the Horry County Clerk of Court regarding the subject convictions, and the pleadings. The Court finds as follows:

I. PROCEDURAL HISTORY

Applicant is confined in the South Carolina Department of Corrections pursuant to orders of commitment of the Horry County Clerk of Court. Applicant was indicted at the January 2013 term of the Horry County Grand Jury for two counts of murder (2013-GS-26-00305, -00307).

Kenneth B. Massey, Esq. represented Applicant, and Brad C. Richardson, of the Fifteenth Circuit Solicitor's Office, prosecuted the case. On February 25, 2015, Applicant pled guilty as indicted before the Honorable Larry B. Hyman. On March 16, 2015, Judge Hyman accepted terms negotiated between Applicant and the State and sentenced Applicant to imprisonment for concurrent terms of 30 years. Applicant did not appeal his plea or sentence.

Present Application

In his post-conviction relief application, Applicant alleges he is being held unlawfully for the following reasons:

1. Ineffective assistance of counsel, in that:
    a. "Counsel gave erroneous advice which led to involuntary guilty plea."
    b. "Counsel failed to request psychiatric examination after being made aware of defendant's mental history."
    c. "Counsel failed to investigate and question co-defendants after being aware of multiple statements."

II. 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 records submitted to it by the parties and the legal arguments made by the attorneys. Pursuant to S.C. Code Ann. § 17-27-80, this Court makes the following findings based upon all of the probative evidence presented.

A. Ineffective Assistance of Counsel

In a post-conviction relief action, an applicant has the burden of proving the allegations in his or her application. Rule 71.1(e), SCRCP; Butler v. State, 286 S.C. 441, 334 S.E.2d 813 (1985). When an applicant alleges ineffective assistance of counsel as a ground for relief, he or she must prove "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." Butler at 442, 334

S.E.2d 441 (quoting Strickland v. Washington, 466 U.S. 668, 686 (1984)). The proper measure of performance is whether an attorney provided representation within the range of competence required in criminal cases. Id.

"[C]ounsel is strongly presumed to have rendered adequate assistance and made all significant decisions in the exercise of reasonable professional judgment." Butler at 442, 334 S.E.2d 441 (quoting Strickland at 690). The applicant must overcome this presumption to receive relief. Cherry v. State, 300 S.C. 115, 118, 386 S.E.2d 624, 625 (1989). "Judicial scrutiny of counsel's performance must be highly deferential, as it is all too tempting for a defendant to second-guess counsel's assistance after conviction or an adverse sentence, and it is all too easy for a court, examining counsel's defense after it has proved unsuccessful, to conclude that a particular act or omission of counsel was unreasonable." Strickland, 466 U.S. at 689; Edwards v. State, 392 S.C. 449, 456-57, 710 S.E.2d 60, 64 (2011). "[W]hen counsel articulates a valid reason for employing a certain strategy, such conduct will not be deemed ineffective assistance of counsel." Smith v. State, 386 S.C. 562, 567, 689 S.E.2d 629, 632 (2010) (citing Caprood v. State, 338 S.C. 103, 110, 525 S.E.2d 514, 517 (2000)).

Courts use a two-pronged test in evaluating allegations of ineffective assistance of counsel. First, the applicant must prove that counsel's performance was deficient. Under this prong, attorney performance is measured by its "reasonableness under professional norms." Cherry at 117, 386 S.E.2d at 625 (citing Strickland at 688). Second, counsel's 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." Cherry at 117-18, 386 S.E.2d at 625 (citing Strickland at 694). With respect to guilty plea counsel, Applicant must show that there is a reasonable probability that, but for counsel's alleged

errors, he would not have pleaded guilty and would have insisted on going to trial. Hill v. Lockhart, 474 U.S. 52, 59 (1985).

The standards do not establish mechanical rules; the ultimate focus of inquiry must be on the fundamental fairness of the proceeding whose result is being challenged. Strickland at 696. A court need not first determine whether counsel's performance was deficient before examining the prejudice suffered by the defendant as a result of the alleged deficiencies; if it is easier to dispose of an ineffectiveness claim on the ground of lack of sufficient prejudice, that course should be followed. Strickland, 466 U.S. at 696-97.

1. Misadvice of Counsel

Applicant alleges Counsel was deficient in advising him that if he pled guilty, he would receive a non-violent sentence. The imposition of a sentence may have a number of collateral consequences, and a plea of guilty is not rendered involuntary in a constitutional sense if the defendant is not informed of the collateral consequences." Williams v. State, 378 S.C. 511, 514-15, 662 S.E.2d 615, 617 (Ct. App. 2008); see also Brown v. State, 306 S.C. 381, 382-83, 412 S.E.2d 399, 400 (1991). Thus, a defendant need not be advised of all collateral consequences of his or her plea in order for the plea to withstand constitutional scrutiny. Id.

A consequence that the defendant must be informed of is one which impacts the sentence imposed on the defendant, and as such, is a direct consequence. See State v. Armstrong, 263 S.C. 594, 598, 211 S.E.2d 889, 891 (1975) (stating the defendant must be apprised of the direct consequences, which are the direct and immediate results, of his guilty plea). "The distinction between 'direct' and 'collateral' consequences of a plea, while sometimes shaded in the relevant decisions, turns on whether the result represents a definite, immediate, and largely automatic

effect on the range of the defendant's punishment." Cuthrell v. Dir., Patuxent Inst., 475 F.2d 1364, 1365-66 (4th Cir. 1973).

The violent/non-violent classification is a collateral consequence of sentencing of which a defendant need not be specifically advised before entering a guilty plea, but if the Defendant's attorney undertakes to advise the defendant about parole eligibility and gives erroneous advice, then the plea may be collaterally attacked. Smith v. State, 329 S.C. 280, 283-85, 494 S.E.2d 626, 628-30 (1997).

At the February 2015 plea proceeding, Judge Hyman asked Applicant if Counsel discussed the possible penalty with him, to which Applicant replied that Counsel did. (Feb. 2015 Tr. 4, ll. 3-7.) Upon further questioning by Judge Hyman, Applicant indicated Counsel told him the penalty would be 30 years. Id. The "violent" classification of murder was not raised by the Court. The sentencing sheets, signed by Applicant, indicate classifications of "VIOLENT" and "MOST SERIOUS."

At the evidentiary hearing, Applicant testified Counsel told him he would receive a non-violent sentence. When asked about his signature on the sentencing sheets, Applicant claimed that he signed the sheets without looking. Counsel denied as much, and testified he fully explained the contours of the plea agreement with Applicant and that Applicant knew he would be serving 30 years.

The Court finds no deficiency on the part of counsel, nor prejudice therefrom. The Court finds Applicant's testimony not credible and finds Counsel's testimony entirely credible. The basic nature of the allegation, that this or any attorney would tell a client that *murder* is a non-violent offense, strains credulity from the outset. Applicant's testimony was wholly self-serving and at odds with his statements of satisfaction with counsel and remorse during his plea and

sentencing. Applicant's demeanor on the stand and throughout the hearing only further leads this Court to give his testimony no weight. To the contrary, Counsel's testimony on this allegation and all other aspects of his representation was clear, concise, precise, and credible. As such, the Court finds Counsel never told Applicant that a sentence for *murder* was classified as non-violent; accordingly, Applicant's request for relief by way of this allegation is **DENIED.**

2. Failure to Order Mental Evaluation

Applicant alleges Counsel was ineffective for failing to request a professional evaluation of Applicant's mental health. Due process prohibits the conviction of a person who is mentally incompetent, and that right cannot be waived by a guilty plea. Jeter v. State, 308 S.C. 230, 232, 417 S.E.2d 594, 595 (1992) (citing Bishop v. U.S., 350 U.S. 961 (1956); Pate v. Robinson, 383 U.S. 375 (1966)). The test of competency to enter a plea is the same as required to stand trial: the accused must have sufficient capability to consult with his lawyer with a reasonable degree of rational understanding and have a rational as well as factual understanding of the proceedings against him. Id., 417 S.E.2d at 596 (citing State v. Lambert, 266 S.C. 574, 225 S.E.2d 340 (1976); Carnes v. State, 275 S.C. 353, 271 S.E.2d 121 (1980)). An applicant alleging incompetence in fact must show by a preponderance of the evidence he was incompetent at the time of his plea. Id.

An applicant alleging ineffective assistance of counsel for failure to seek a mental health evaluation, however, must still satisfy the two prongs of Strickland: applicant must demonstrate (1) a 'reasonable probability' that he was not competent at the time of the crime or at the time of the plea, and (2) that counsel's failure to seek an evaluation was unreasonable. Id. at 233, 417 S.E.2d at 596. Counsel may reasonably rely on his own perceptions in deciding if a client is competent to stand trial. Id.

At the plea proceeding, the Court inquired as to Applicant's mental health:

> [THE COURT:] Mr. Evans, have you ever had any mental health issues or addition issues, anything like that that would interfere with your ability to understand what we're doing here today?
>
> MR. EVANS: There was issues in the past but I don't know if they would ---
>
> THE COURT: Do you feel like anything is interfering – do you understand what we're doing here today?
>
> MR. EVANS: No, sir.
>
> THE COURT: Well, let me just say this, Mr. Evans. If at any point you don't understand what we're doing, I want you to explain it to you. Okay?
>
> MR. EVANS: Okay.
>
> THE COURT: I can't give you legal advice but I'll be happy to explain anything to you that you need explained. All right?
>
> MR. EVANS: All right.

(Feb. 2015 Tr. 7, ll. 5-20.)

At the evidentiary hearing, Applicant complained Counsel never bothered to have his mental health evaluated. However, Applicant couldn't say if he needed an evaluation. Counsel testified he never heard of Applicant having any prior mental health treatment. Counsel noted Applicant appeared to be of sound mind in the course of his representation, and that he had no reason to believe Applicant's mental health was an issue to be explored. No expert testimony was offered at the hearing.

The Court finds no deficiency on the part of Counsel, nor prejudice therefrom. Applicant offers no compelling evidence to believe he was not competent at the time of his plea, or that it would have otherwise been a matter of relevant concern. Counsel was entitled to rely upon his own perception of Applicant's mental health and detected no mental deficiencies that merited

further investigation. Accordingly, Applicant's request for relief by way of this allegation is **DENIED.**

3. Failure to Investigate and Question Co-Defendants

Applicant alleges Counsel was ineffective by failing to investigate and question his co-conspirators, Sandy Lee Locklear and Odom Bryant. In order to prevail upon a claim that counsel did not adequately prepare or investigate a case, an applicant must present evidence of what counsel could have discovered or what other defenses applicant could have requested counsel develop and present had counsel been more prepared. Harris v. State, 377 S.C. 66, 75-76, 659 S.E.2d 140, 145-46 (2008) (citing Jackson v. State, 329 S.C. 345, 353-54, 495 S.E.2d 768, 772 (1998)). Furthermore, an applicant must also present evidence to show how the discoverable matters or defenses would have resulted in a different outcome. Id. (citing Davis v. State, 326 S.C. 283, 288, 486 S.E.2d 747, 749 (1997); Skeen v. State, 325 S.C 210, 214, 481 S.E.2d 129, 132 (1997)). Mere speculation as to how the alleged lack of preparation prejudiced an applicant is not sufficient to support a grant of relief. Id., 377 S.C. at 75, 659 S.E.2d at 145 (citing Glover v. State, 318 S.C. 496, 498, 458 S.E.2d 538, 540 (1995)).

During the plea proceeding, the State's recitation of facts incorporated elements of Applicant's statements to law enforcement, as well as those of his co-conspirators:

> [W]henever they interviewed the [Applicant], he admitted Ms. Amy Locklear had approached him sometime shortly before the murder and asked if he wanted to make some big money. There was a – what she thought a million-dollar life insurance policy but the value of the policy due to the manner of death ended up being worth $200,000 but she thought it was a million-dollar policy. She indicated she was ready to pay $50,000 to have her husband executed. *This [Applicant] said he couldn't pull the trigger* but agreed to go get Odom Bryant. He then – he then rode with Odom Bryant and Sandy Locklear back over to the residence. Sandy Locklear went in first, left the door open or unlocked the door so that they could come in.

> It's the State's belief that *Odom Bryant just went in and pulled the trigger* based on the fact that he had a gun that was similar to the one used in the incident the next morning about eight hours after the murder was committed. The reason for the murder was a murder for insurance proceeds, murder for profit. *The only thing that Sandy Locklear and Odom Bryant agreed on was this [Applicant] didn't have a gun. But those two pointed the finger at one another, Your Honor.* He was present during the commission of the crime, had driven there with them, helped dispose of a rental vehicle Ms. Locklear had had afterwards, was seen in the company of Odom Bryant at the gas station convenience store in Tabor City shortly after the crime where Odom Bryant still had the gun that was probably used in this crime, Your Honor.

(Feb. 2015 Tr. 9-10)(emphasis and paragraph breaks added). Applicant confirmed the State's recitation of facts. (Feb. 2015 Tr. 10, ll. 14-15.)

At the evidentiary hearing, Applicant stated Counsel failed to adequately prepare his case by failing to get statements from his co-conspirators. Applicant asserted he was not the "trigger man." Applicant noted that Locklear gave multiple statements. Applicant recalled Counsel did not wish to attempt to use Locklear as witness because she was "not credible." On cross-examination, Applicant again confirmed the facts presented at his plea.

Counsel testified that he spoke with the attorneys for the co-conspirators in court, but did not indicate anything came of the conversations. Counsel recalled finding nothing exculpatory in the statements provided by Locklear and Bryant. Counsel bluntly testified Applicant had no defenses available to him, that his statements to law enforcement doomed him, that the case was not one that could reasonably be taken to trial, and that the goal throughout was to "save" Applicant with the best plea deal he could get.

The Court finds no deficiency on the part of Counsel, nor prejudice therefrom. No evidence was introduced at the hearing to show what, if anything, Counsel was supposed to find in the statements of Applicant's co-conspirators that would help Applicant—the Court is left with mere speculation. That Applicant was not the "trigger man" was conceded by the State in

the plea proceeding, a fact that appears to reflect his sentence of 30 years, as compared to the life sentences his co-conspirators received. Furthermore, Counsel did attempt to speak with the attorneys for Locklear and Bryant; Counsel would have committed a professional violation had he attempted to speak to either co-conspirator directly. Counsel was aware of and reviewed their statements. For all these reasons, Applicant's request for relief by way of this allegation is **DENIED**.

B. All Other Allegations

Applicant, throughout his testimony, attempted to raise new allegations against Counsel, against the State, and against prior defense counsel.[1] The Court respectfully declines to consider the allegations. See, generally Mangal v. State, 421 S.C. 85, 805 S.E.2d 568 (2017). Applicant enjoyed ample opportunity to amend his application to reflect additional allegations, but failed to do so through appointed counsel—as such, the allegations offered in his testimony are procedurally defaulted. The limited testimony offered by Applicant at the evidentiary hearing regarding the additional allegations, as well as the limited testimony elicited from Counsel, gives this Court no reason to believe the interests of justice demand extraordinary relief from the pleading requirements, or that further proceedings are necessary. The complete record before this Court shows without question that Applicant's guilty plea was entered knowingly, intelligently, and voluntarily.

[1] J. Eric Fox, Esq., was incidentally present in the courtroom that day for a different PCR evidentiary hearing.

III. CONCLUSION

Based on all the foregoing, this Court finds and concludes that Applicant has not established any constitutional violations or deprivations that would require this Court to grant his application. Therefore, this application for post-conviction relief must be denied and dismissed with prejudice.

This Court notifies the Applicant that he must file and serve a notice of appeal within thirty (30) days from the receipt by counsel 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 (1991), an Applicant has a right to an appellate counsel's assistance in seeking review of the denial of PCR. Rule 71.1(g), SCRCP provides that if the Applicant wishes to seek appellate review, PCR counsel must serve and file a Notice of Appeal on the Applicant's behalf. Your attention is directed to South Carolina Appellate Court Rule 243 for appropriate procedures for appeal.

IT IS THEREFORE ORDERED:

1. That the Application for Post-Conviction Relief must be denied and dismissed with prejudice; and

2. The Applicant must be remanded to the custody of the South Carolina Department of Corrections.

AND IT IS SO ORDERED this 18 **day of** February **, 2018.**

WILLIAM H. SEALS, JR.
Presiding Judge
Fifteenth Judicial Circuit

Marion, South Carolina

STATE OF SOUTH CAROLINA)
) IN THE COURT OF COMMON PLEAS
COUNTY OF HORRY)

Nehemiah J. Evans, #295717) CASE NO.
☐ Plaintiff) 2015-CP-26-7825

v.) MOTION AND ORDER INFORMATION
) FORM AND COVER SHEET

State Of South Carolina)
☒ Defendant.)

2018 FEB 28 PM 12:15
HORRY COUNTY
CLERK OF COURT
HORRY COUNTY, S.C.

Plaintiff's Attorney:	Defendant's Attorney:
Steven W. Fowler, Bar No. 69683	Johnny E. James Jr, Bar No. 101
Address:	Address:
730 Main St., Unit 237 N. Myrtle Beach, SC 29582	Post Office Box 11549 Columbia SC 29211-154
phone: fax:	phone: (803) 734-3737 fax: (803) 734-4113
e-mail: other:	e-mail: other:

☐ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
☒ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I: Hearing Information

Nature of Motion:
Estimated Time Needed: Court Reporter Needed: ☐ YES / ☐ NO

SECTION II: Motion/Order Type

☐ Written motion attached
☒ Form Motion/Order
I hereby move for relief or action by the court as set forth in the attached proposed order.

Johnny E. James Jr. February 14, 2018
Signature of Attorney for ☐ Plaintiff / ☒ Defendant Date submitted

SECTION III: Motion Fee

☐ PAID – AMOUNT:
☒ EXEMPT: ☐ Rule to Show Cause in Child or Spousal Support
(check reason) ☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status ☐ State Agency v. Indigent Party
☐ Sexually Violent Predator Act ☒ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP)
☐ Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter:
☐ Other:

JUDGE'S SECTION	
☐ Motion Fee to be paid upon filing of the attached order.	JUDGE
☐ Other:	CODE: Date:

CLERK'S VERIFICATION

Date Filed:
Collected by:

☐ MOTION FEE COLLECTED:
☐ CONTESTED – AMOUNT DUE:

MAILED
3/5/18 - SH

SCCA/233 (11-03)

ALAN WILSON
ATTORNEY GENERAL

February 26, 2018

The Honorable Renee N. Elvis
Clerk of Court, Horry County
Post Office Box 677
Conway, SC 29528-0677

Re: Nehemiah Evans, #295717 v. State of South Carolina
2015-CP-26-7825

Dear Ms. Elvis:

Enclosed please find the original **Order of Dismissal** signed by the Honorable William H. Seals, Jr., in the above-captioned case, for filing in your office.

Pursuant to Rule 71.1(f), of the South Carolina Rules of Civil Procedure, please "provide notice of entry of judgment and serve a copy of the order or judgment to the parties as provided in Rule 77(d), SCRCP."

In addition, please forward proof of service and a time stamped copy back to our office for our file.

Should you have any questions, please do not hesitate to call me at (803) 734-3737.

Sincerely,

Johnny Ellis James Jr.
Assistant Attorney General

JEJ/mm

Enclosure

ALAN WILSON
ATTORNEY GENERAL

March 15, 2018

Steven W. Fowler, Esquire
Fowler Law Firm
730 Main Street, Unit 237
North Myrtle Beach, SC 29582

Re: **Nehemiah J. Evans, #295717 v. State of South Carolina**
2015-CP-26-7825

Dear Mr. Fowler:

Enclosed please find a copy of the **Order of Dismissal** for the above-captioned post-conviction relief application; signed by the Honorable William H. Seals, Jr., Presiding Judge for the Fifteenth Judicial Circuit.

Sincerely,

Johnny F. James Jr.
Assistant Attorney General

JEJ/mm
Enclosure

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

IN THE COURT OF COMMON PLEAS

NEHEMIAH J. EVANS, #295717,

Applicant,

v.

STATE OF SOUTH CAROLINA,

Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the **Order of Dismissal** has been served upon the applicant by mailing one (1) copy in the United States mail, postage prepaid, addressed to:

Steven W. Fowler, Esquire
Fowler Law Firm
730 Main Street, Unit 237
North Myrtle Beach, SC 29582

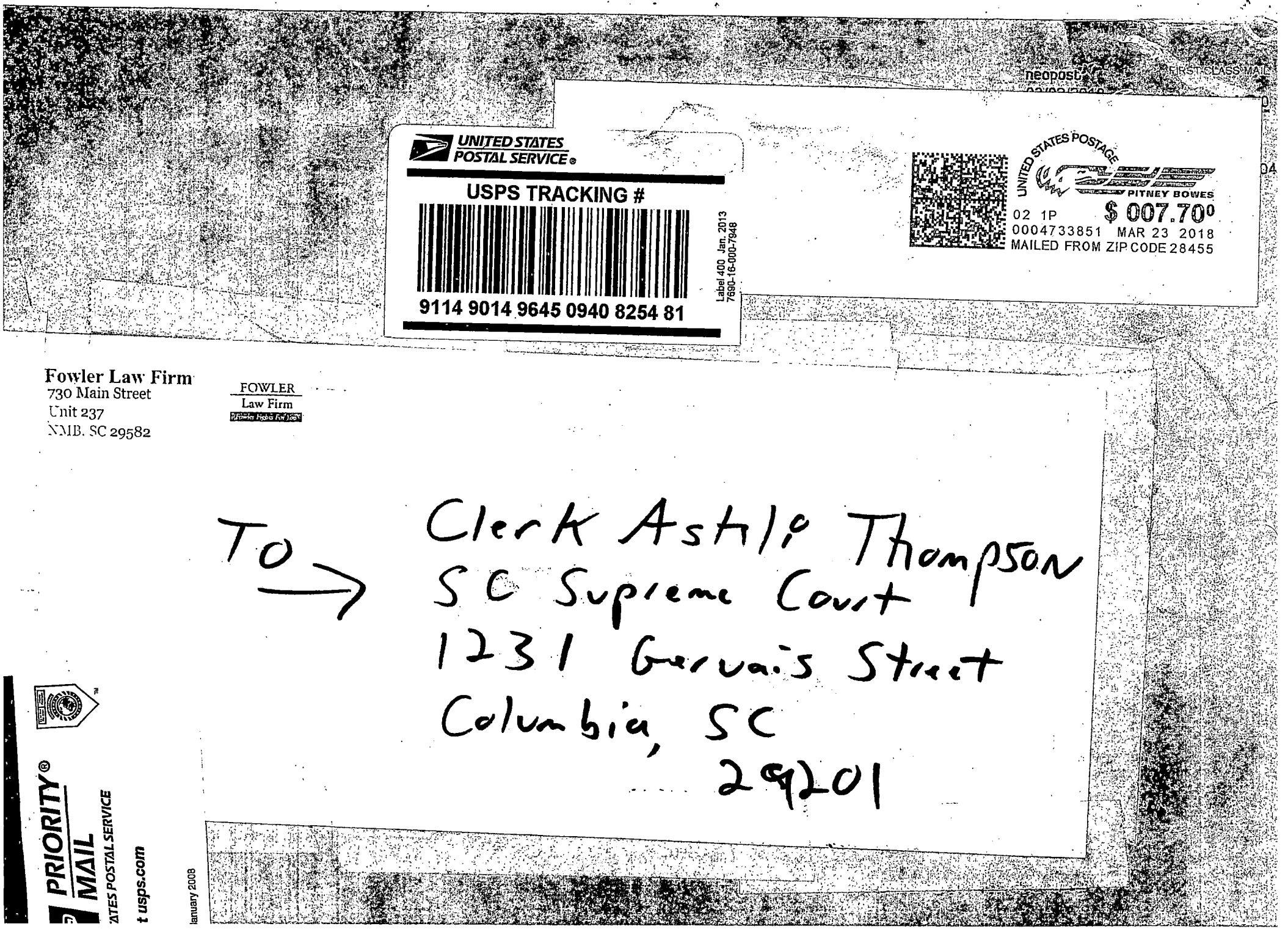
This 15th day of March, 2018.

MALLORY MORRIS
LEGAL ASSISTANT FOR RESPONDENT

SWORN to before me this 15th day of March, 2018.

Notary Public for South Carolina.
My Commission Expires: 5/14/2024

2015-CP-26-7825


neopost
FIRST-CLASS MAIL
UNITED STATES POSTAL SERVICE
USPS TRACKING #
9114 9014 9645 0940 8254 81
Label 400 Jan. 2013
7690-16-000-7948
UNITED STATES POSTAGE
PITNEY BOWES
02 1P $ 007.70⁰
0004733851 MAR 23 2018
MAILED FROM ZIP CODE 28455
Fowler Law Firm
730 Main Street
Unit 237
NMB, SC 29582
FOWLER
Law Firm
TO →
Clerk Astrid Thompson
SC Supreme Court
1231 Gervais Street
Columbia, SC
29201
PRIORITY®
MAIL
ATES POSTAL SERVICE
t usps.com
January 2008