

LAW OFFICE OF BRIAN P. JOHNSON, LLC

P 864.331.1630
F 864.672.4009
www.brianpjohnsonlaw.com

522 North Church Street
Greenville, SC 29601
brian@brianpjohnsonlaw.com

August 26, 2016

VIA U.S. POSTAL

Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211

Re: Cameron Hammonds vs. State of South Carolina
Case No.: 2014-CP-23-3379

Dear Supreme Court Clerk:

I am writing to you regarding the above referenced case. Please find enclosed the Notice of Appeal, Proof of Service, and Order of Dismissal.

If you wish to discuss the foregoing or need additional information please contact me at 864-331-1630.

Thank you.

Sincerely,



Brian P. Johnson

RECEIVED

SEP 02 2016

S.C. SUPREME COURT

BPJ/lf
cc: Patrick Schmeckpeper, Esquire

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
HONORABLE R KNOX MCMAHON

Case No.: 2014-CP-23-3379

CAMERON HAMMONDS,)
)
 PETITIONER,)
)
 vs.)
)
 STATE OF SOUTH CAROLINA)
)
 RESPONDENT.)
)


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NOTICE OF APPEAL SEP. 02 2016

S.C. SUPREME COURT

The Petitioner, Cameron Hammonds, hereby appeals the Honorable R. Knox McMahon's August 5, 2016, order denying post-conviction relief to the Petitioner. A copy of the order on appeal is attached to this notice.

Respectfully submitted,



Brian P. Johnson, Esq.
522 North Church Street
Greenville, SC 29601
Attorney for Petitioner
SC Bar: 73996

Date: August 26, 2016
Other counsel of record: Patrick Schmeckpeper
P.O. Box 11549/Columbia, SC 29211

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
HONORABLE R. KNOX MCMAHON

Case No.: 2014-CP-23-3379

CAMERON HAMMONDS,)
)
PETITIONER,)
)
vs.)
)
STATE OF SOUTH CAROLINA)
)
RESPONDENT.)

PROOF OF SERVICE

I, Brian P. Johnson, Esq., certify that I have today served the within notice of appeal upon the Respondent by depositing a copy in the United States Mail, postage prepaid, addressed to the attorney of record, Patrick Schmeckpeper, at P.O. Box 11549 Columbia, SC 29211.

Respectfully submitted,



Brian P. Johnson, Esq.
522 North Church Street
Greenville, SC 29601
Attorney for Petitioner
SC BAR: 73996

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SEP 02 2016

S.C. SUPREME COURT

Greenville, SC
August 26, 2016

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

Cameron Hammonds,
S.C.D.C. No. 338191

Applicant,

v.

State of South Carolina,

Respondent.

) IN THE COURT OF COMMON PLEAS

) THIRTEENTH JUDICIAL CIRCUIT

) C.A. No. 2014-CP-23-3379

RECEIVED

SEP 02 2016
ORDER OF DISMISSAL
(with prejudice)

S.C. SUPREME COURT

ENTERED COMPUTER

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FILED-CLERK OF COURT
GREENVILLE CO. S.C.
PAUL D. WICKENSIMMER

This matter comes before the Court by way of a post-conviction relief (PCR) application filed on June 17, 2014. Respondent filed its Return on October 21, 2014. An evidentiary hearing into the matter was convened on April 19, 2016, at the Greenville County Courthouse. Applicant was present and testified in his defense. The prosecuting solicitors – Sylvia Harrison, Esquire, of the Greenville County Solicitor’s Office, and George Campbell, Esquire – also testified.¹ Applicant was represented by Brian Johnson, Esquire. Respondent was represented by Patrick Schmeckpeper, Esquire, of the South Carolina Attorney General’s Office.

PROCEDURAL HISTORY

The Applicant is incarcerated with the South Carolina Department of Corrections pursuant to the Greenville County Clerk of Court’s orders of commitment. The Greenville County Grand Jury indicted the Applicant at the November 2007 term of General Sessions for murder (2007-GS-23-9564, count 1) and possession of a weapon during commission of a violent crime (2007-GS-23-9564, count 2). E.P. “Bill” Godfrey, Esquire represented the Applicant.

After the State brought the case to trial, the Applicant was found guilty. On December 1, 2009, the Honorable Edward W. Miller sentenced the Applicant to concurrent terms of life

¹ Applicant’s trial counsel was not available to testify as a result of serious health concerns. PCR Tr. p. 4.

imprisonment for murder and 5 years for possession of a weapon during commission of a violent crime.

A notice of appeal was filed at the South Carolina Court of Appeals. LaNelle C. DuRant, Esquire, of the South Carolina Commission on Indigent Defense, Division of Appellate Defense perfected the appeal. The Court of Appeals affirmed the Applicant's convictions and sentences. State v. Hammonds, Op. No. 2012-UP-440 (S.C. Ct. App. filed July 18, 2012). The South Carolina Supreme Court denied the Applicant's subsequent petition for writ of certiorari by order dated March 19, 2014. The Remittitur was sent on April 1, 2014.

Allegations

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

1. Ineffective assistance of trial counsel.
 - a. Failed to "object or file a motion that the Court did not pronounced sentence for murder and possession of a weapon during commission of a violent crime from the bench."
 - b. Advised the Applicant to reject the 30-year plea offer.
 - c. Failed to "object or make motions to the unconstitutional jury charge of Criminal Intent, I as much as, the court failure to charge criminal intent to murder resulted in a conviction of lees than proof of the elements that required by law for murder." (emphasis in original)

At the evidentiary hearing, Applicant proceeded on allegations that counsel was ineffective for failing to adequately prepare; for advising him that he was eligible for a charge on self-defense; for failing to inform him that he was not likely to be acquitted on self-defense; and failing to move for a sentencing reconsideration.

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 reviewed the Clerk of Court records regarding the subject convictions, appellate records, Applicant's records from the South Carolina Department of Corrections, the application for post-conviction relief, the transcripts and documents from the prior proceedings, and the legal arguments of counsel. Pursuant to S.C. Code Ann. §17-27-80 (2015), this Court makes the following findings of fact and conclusions of law based upon all of the probative evidence presented.

Ineffective Assistance of Counsel

In a post-conviction relief action, the applicant has the burden of proving the allegations in the application. Rule 71.1(e), SCRCP; Butler v. State, 286 S.C. 441, 334 S.E.2d 813 (1985). Where ineffective assistance of counsel is alleged as a ground for relief, the Applicant must prove that "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." Strickland v. Washington, 466 U.S. 668, (1984); Butler, 286 S.C. 441, 334 S.E.2d 813 (1985).

The proper measure of performance is whether the attorney provided representation within the range of competence required in criminal cases. Courts presume that counsel rendered adequate assistance and made all significant decisions in the exercise of reasonable professional judgment. Butler, 286 S.C. 441, 334 S.E.2d 813 (1985). The applicant must overcome this presumption to receive relief. Cherry v. State, 300 S.C. 115, 386 S.E.2d 624 (1989).

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, 300 S.C. at 117, 385 S.E.2d at 625 (citing Strickland). 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." Id. at 117-18, 386 S.E.2d at 625.

Failure to Adequately Prepare

Applicant first alleged counsel was ineffective in that he did not have time to perform a reasonable investigation. He said counsel should have requested a continuance to better prepare for trial on the self-defense mitigation evidence. This court finds Applicant has failed to meet his burden with respect to this allegation.

First, Applicant's self-serving testimony regarding the amount of time spent with counsel is not credible. Bill Godfrey, Applicant's actual trial counsel, was also his first attorney in this case. PCR Tr. p. 12, l. 22-25; p. 21, l. 17-21. The Solicitor's Office initially sent discovery to Mr. Godfrey. PCR Tr. p. 21, l. 22 - p. 23, l. 3. Thereafter, Applicant was appointed one or more different attorneys, and Mr. Godfrey was apparently relieved.² PCR Tr. p. 12, l. 24 - p. 13, l. 7; p. 21, l. 17-21. Shortly before trial, Applicant retained Mr. Godfrey to represent him again. Id.

This Court finds Applicant has failed to meet his burden to prove counsel was not prepared to go to trial.³ Counsel handled this case for more than the five days alleged by Applicant, and received discovery from the Solicitor's office. Applicant cannot competently speculate as to the extent of counsel's preparations. Moreover, even assuming Applicant's testimony regarding the number of meetings was true, brevity of time spent in consultation with Applicant, without more, does not establish that trial counsel was ineffective. Harris at 75, 659 S.E.2d at 145 (*citing Easter v. Estelle*, 609 F.2d 756, 759 (5th Cir. 1980)). There is a strong presumption that counsel rendered adequate assistance and exercised reasonable professional

² It is not entirely clear from the record how Mr. Godfrey's initial representation of Applicant came to an end.

³ Even Applicant testified that counsel never indicated to him that he needed a continuance or was not ready to take his case to trial. PCR Tr. p. 17, l. 18-20.

judgment in making all significant decisions in the case. Ard v. Catoe, 372 S.C. 318, 331, 642 S.E.2d 590, 596 (2007) (citing Strickland, supra). In this Court's mind, Applicant has failed to overcome that presumption, particularly when taking into account the fact that counsel was a seasoned criminal defense attorney with over two decades of experience at the time he tried this case.⁴ See Harris v. State, 377 S.C. 66, 75, 659 S.E.2d 140, 145 (2008) (reversing PCR judge's finding that counsel's preparation inadequate, citing counsel's experience as a criminal defense attorney). Accordingly, there is no credible evidence or testimony in the record in support of Applicant's assertion that counsel was not adequately prepared for trial. This Court therefore finds Applicant has failed to meet his burden to show deficiency.

Regardless, Applicant has failed to show prejudice resulting from counsel's alleged failure to adequately prepare. See Glover v. State, 318 S.C. 496, 498, 458 S.E.2d 538, 540 (1994) (noting mere speculation and conjecture is insufficient to substantiate allegation that counsel's deficient performance was prejudicial). Applicant has not presented any evidence as to how additional preparation would have affected the outcome of the proceeding; instead, he has simply alleged that counsel should have prepared more. This allegation is therefore denied and dismissed.

Self-Defense Advice

This Court further finds Applicant has failed to meet his burden with respect to his allegations that counsel was ineffective in advising him that he was eligible for self-defense.

i). Deficiency

a. Advice on whether Applicant was eligible for a charge on self-defense

⁴ Sylvia Harrison, of the Greenville County Solicitor's Office, testified that she had known counsel since 1991 or '92, and that he had been a criminal defense attorney that entire time.⁴ PCR Tr. p. 22, l. 25 - p. 23, l. 5.

Applicant alleged counsel was ineffective in telling him he qualified for the elements of self-defense. Applicant said that since his conviction, he learned that he did not qualify for self-defense because his “showing up to the [victim’s] property asking some questions brought on a difficulty to the situation.” PCR Tr. p. 8, l. 15-18. Applicant has failed to meet his burden. First, Applicant did indeed qualify for a charge on self-defense, as evidenced by the fact the trial judge charged the jury on self-defense prior to deliberations. Tr. Day 2, p. 77, l. 13 - p. 79, l. 8. Moreover, after independently reviewing the facts of the case, this Court finds Applicant was entitled to a charge on self-defense based on his testimony at trial.

If there is any evidence in the record from which it could reasonably be inferred that the defendant acted in self-defense, the defendant is entitled to instructions on the defense, and the trial judge’s refusal to do so is reversible error. State v. Frazier, 401 S.C. 224, 233, 736 S.E.2d 301, 306 (Ct. App. 2013). A person is justified in using deadly force in self-defense when: 1) the defendant is without fault in bringing on the difficulty; 2) the defendant ... actually believed he was in imminent danger of losing his life or sustaining serious bodily injury, or he actually was in such imminent danger; 3) if the defense is based upon the defendant’s actual belief of imminent danger, a reasonable man of ordinary firmness and courage would have entertained the same belief; and 4) the defendant had no other probable means of avoiding the danger of losing his own life or sustaining serious bodily injury than to act as he did in this particular instance. State v. Dickey, 394 S.C. 491, 499, 716 S.E.2d 97, 101 (2011) (internal citations omitted).

Based on Applicant’s trial testimony, this Court finds counsel correctly informed him he was eligible for self-defense. Applicant testified at trial that on the night of the murder his brother was robbed and badly beaten. Tr. Day 2, p. 14-18. Applicant found the car and reported it to law enforcement. Id. Applicant said he returned to that spot later, while on his way to

another location. Id. Applicant saw two men in the yard, and asked why he robbed his little brother. Tr. Day 2, p. 22. Applicant testified that following a brief verbal exchange, the man on the porch pulled a gun. Tr. Day 2, p. 23. He said the man in the yard also tried to pull his gun, but “fumbled” it. Tr. Day 2, p. 23-24. Applicant said he caught the fumbled gun, pulled his gun, and then turned and started running and shooting. Tr. Day 2, p. 24. Applicant said he thought he was going to be killed. Tr. Day 2, p. 25. Applicant’s testimony at the PCR hearing was substantially similar. PCR Tr. p. 11-20.

Taken as true, this Court finds Applicant was eligible for a charge on self-defense. Specifically concerning the first element, if the jury believed Applicant’s testimony, it could have reasonably inferred that he did not bring about the difficulty – he said that he simply stopped at the victim’s house on his way somewhere else; that he only intended to speak with the victim; and that he did not pull out his gun until after the victim and the man on the porch drew theirs. Compare State v. Slater, 373 S.C. 66, 71, 644 S.E.2d 50, 53 (2007) (finding defendant was not without fault in bringing on the difficulty where he was unlawfully in possession of a weapon, and carried the cocked weapon, in open view, into an already violent attack in which he had no prior involvement). Accordingly, Applicant has failed to show counsel was deficient in advising him that he was eligible for self-defense.

b. Advice on whether self-defense claim was likely to succeed

Applicant also appears to have alleged that counsel was ineffective for failing to advise Applicant that he was not likely to be acquitted for murder on self-defense grounds. This Court finds he has failed to meet his burden. As discussed above, counsel correctly informed Applicant that he was eligible for self-defense. Assuming, for the sake of argument, that Applicant’s depiction of counsel’s advice to proceed to trial is believable, this Court finds the

advice itself was not objectively unreasonable. PCR Tr. p. 17, l. 12. Applicant had a viable self-defense claim, particularly in light of the discrepancies in the State's case. One of the State's key witnesses, Stephon Brewster, recanted his prior statement to law enforcement, and refused to implicate Applicant on the stand. Tr., Day 1, p. 95-107. The State's other eyewitness, Kelvin Harris, testified that he could not see the porch from his vantage point during the shooting, and was therefore unable to fully refute Applicant's self-defense claim. Tr., Day 1, p. 116, l. 4-10; 119, l. 7-11; 131, l. 3-9. As a result, the portion of Applicant's testimony that he drew his gun only after an unknown assailant on the porch pointed a weapon at him was practically unrefuted at trial. Tr. Day 2, p. 23.⁵

Because Applicant has failed to show counsel's alleged advice was objectively unreasonable, this Court finds he has failed to meet his burden to prove deficiency. This allegation is therefore denied and dismissed.

ii.) Prejudice

Applicant has failed to show prejudice resulting from counsel's alleged deficient performance. The Supreme Court of the United States has held that an attorney's advice on whether to reject a plea offer is subject to a Strickland-type ineffective assistance claim. Lafler v. Cooper, 132 S.Ct. 1376, 1383, 182 L.Ed.2d 398 (2012). In order to show prejudice on such a claim, an applicant must show that there is a "reasonable probability that the plea offer would have been presented to the court (i.e., that the [applicant] would have accepted the plea and the prosecution would not have withdrawn it in light of intervening circumstances), that the court would have accepted its terms, and that the conviction or sentence, or both, under the offer's

⁵ Counsel brought both of these points up during his closing argument. He reminded the jury that Applicant "said there was a fella on the porch," and Mr. Harris "could not see the porch because he was sitting back from an angle. He didn't know who or what was on the porch." Tr., Day 2, p. 64, l. 6-13. He also highlighted that "Mr. Brewster says he didn't tell the police the truth when he made his statement" because he was "trying to get the heat off himself." Tr. Day 2, p. 60, l. 3-6.

terms would have been less severe than under the judgment and sentence that in fact were imposed.” Id. at 1385.⁶

Applicant has failed to show counsel’s advice induced his decision to proceed to trial – the evidence and testimony in the record indicates Applicant rejected the State’s plea offer prior to hiring counsel. One of Applicant’s previous attorneys conveyed an offer for thirty (30) years. PCR Tr. p. 13, l. 8-11; p. 22, l. 20-22. Applicant rejected that offer and subsequently hired counsel. Id. As a result, even assuming Applicant credibly testified that he would have chosen to take that plea offer but for counsel’s alleged deficient performance, he has failed to establish – as is his burden – that the offer was actually still available at that time.⁷

Regardless, this Court also finds Applicant’s self-serving testimony is not credible. See Merzbacher v. Shearin, 706 F.3d 356 (4th Cir. 2013) (to demonstrate a reasonable probability that he would have accepted a plea, a petitioner’s testimony that he would have done so must be credible). Applicant’s statement that he would have taken a favorable plea deal is “the type of testimony ... subject to heavy skepticism.” See United State v. Day, 969 F.2d 39, 46 n. 9 (3d Cir. 1992) (“[C]ourts should be wary of this sort of claim because defendants will always want the best of both worlds: the chance at acquittal at trial, yet the chance to plead guilty if the trial defense fails.”). This Court also takes into account that Applicant rejected⁸ the plea offer conveyed by his previous attorney, and has continuously maintained that he believes the killing

⁶ The proper remedy, where an applicant has shown that but for counsel’s deficient performance there is a reasonable probability he and the trial court would have accepted the guilty plea, is to order the State to reoffer the plea agreement, and then, if petitioner accepted the offer, the state trial court could exercise its discretion regarding whether to resentence. Id. at 1391.

⁷ Mr. Campbell – the lead prosecutor on the case – was unable to recall how late in the process the plea offer was revoked. PCR Tr. p. 27, l. 25 - p. 28, l. 13. Mr. Campbell testified that he would not have had the authority to reopen the offer once it had expired without permission from his supervisors. PCR Tr. p. 28, l. 23 - p. 29, l. 15.

⁸ According to Mr. Campbell’s credible testimony, Applicant “absolutely refused” to take any plea deals. PCR Tr. p. 28.

was justified.⁹ As a result, Applicant has failed to meet his burden to show prejudice. This allegation is therefore denied and dismissed.

Failure to ask for Sentencing Reconsideration

Applicant also alleged, orally at the evidentiary hearing, that counsel was ineffective for failing to move for reconsideration. Applicant has not met his burden. As outlined above, there is a strong presumption that counsel rendered adequate assistance and exercised reasonable professional judgment in making all significant decisions in the case. Ard v. Catoe, 372 S.C. 318, 331, 642 S.E.2d 590, 596 (2007) (citing Strickland, *supra*). Applicant has not presented any evidence that counsel was deficient in failing to move for reconsideration. Additionally, whether or not to grant a motion for reconsideration is within the discretion of the sentencing judge. State v. Smith, 276 S.C. 494, 498, 280 S.E.2d 200, 202 (1981). In order to show prejudice arising out of failure to file a motion for reconsideration, Applicant must show a reasonable probability that the outcome of the proceeding would have been different – that he would have received a more favorable sentence. Strickland, *supra*. At the evidentiary hearing, Applicant's sole justification for sentence reconsideration appears to be that he had no prior criminal record, and was sentenced to life imprisonment. PCR Tr. p. 14, l. 4-11. However, the trial judge heard from counsel during sentencing that Applicant had no prior criminal background. Tr. Day 2, p. 88, l. 24 - p. 89, l. 1. 11. Because Applicant has failed to present any evidence that there was a reasonable probability that a motion to reconsider his sentence would have actually been granted, this allegation is denied and dismissed.

⁹ See Merzbacher, *supra* (upholding state court's finding that petitioner's self-serving testimony that he would have accepted guilty plea but for counsel's deficient performance was not credible in light of, *inter alia*, petitioner's continued insistence that he was innocent).

ALL OTHER ALLEGATIONS

As to any and all allegations that were raised in the application or at the hearing in this matter and not specifically addressed in this order, the Court finds Applicant failed to present any evidence regarding such allegations. Accordingly, the Court finds Applicant has abandoned any such allegations.

[Signature follows]

CONCLUSION

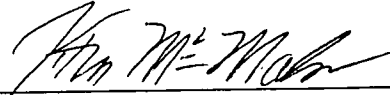
Based on the foregoing, this Court finds that the Applicant has not established any constitutional violations or deprivations that would require this Court to grant his application for post-conviction relief. Therefore, this application for post-conviction relief must be denied and dismissed with prejudice.

This Court notes that Applicant must file and serve a notice of intent to appeal within thirty (30) days from receipt of this Order to secure the appropriate appellate review. See Rule 203, SCACR. Rule 71.1(g), SCRCP; Bray v. State, 336 S.C. 137, 620 S.E.2d 743 (2005), for the obligation of Applicant's counsel to file and serve notice of appeal. The Applicant's attention is also directed to South Carolina Appellate Court Rule 243 for appropriate procedures after notice has been timely filed.

IT IS THEREFORE ORDERED

1. That the Application for Post-Conviction Relief must be denied and dismissed with prejudice; and
2. Applicant must be remanded to the custody of the South Carolina Department of Corrections.

AND IT IS SO ORDERED this 5 day of August, 2016.



R. KNOX MCMAHON
Presiding Judge
Thirteenth Judicial Circuit

Columbia, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE
CASE NO: 2014CP2303379

FILED-CLECK OF COURT
GREENVILLE, O. S. C.
PAUL B. WICKENSIMER
2016 AUG 23 PM 2:21

Cameron Hammonds vs. South Carolina State Of

CHECK ONE:

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**
SCRCP (Vol. Nonsuit); Rule 12(b), SCRCP; Rule 41(a),
 Rule 43(k), SCRCP (Settled); Other: _____
- ACTION STRICKEN (CHECK REASON):**
 Rule 40(j) SCRCP; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other: _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other: _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order; Statement of Judgment by the Court:

Dated at Greenville, South Carolina, this .

Court Reporter:

PRESIDING JUDGE - R KNOX MCMAHON

This judgment was entered on the , and a copy mailed first class this , to attorneys of record or to parties (when appearing pro se) as follows:

Brian P. Johnson 522 North Church Street
Greenville, SC 29601

Patrick Lowell Schmeckpeper PO Box 11549
Columbia, SC 29211

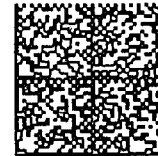
ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Paul B. Wickensimer Greenville County Clerk Of Court
- Clerk of Court

Law Office of Brian P. Johnson

522 North Church Street
Greenville, SC 29601



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