

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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CERTIORARI TO YORK COUNTY  
Court of Common Pleas  
J. Mark Hayes, II, Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2017-002355  
Lower Case No. 2015-CP-46-2859

Kenneth D. Morris, #334303 ..... Respondent,

v.

State of South Carolina ..... Petitioner

AFFIDAVIT OF SERVICE

PERSONALLY appeared before me Sandy Traynham who, after being duly sworn, deposes and says that she is the Secretary for C. Rauch Wise, Attorney for the Respondent in the above entitled case. That on May 31, 2018, she did deposit in the United States Mail with proper postage affixed thereto a copy of the Motion for Bond Pending Petition for Writ of Certiorari in the above case addressed to Megan Harrigan Jameson, Senior Assistant Deputy Attorney General, Office of the Attorney General, P.O. Box 11549, Columbia, South Carolina 29211.

SWORN to and Subscribed  
before me this 31<sup>st</sup> day

Sandy Traynham

of May, 2018.

[Signature] (L.S.)

Notary Public for South Carolina

My Commission expires: 12/31/2018

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from York County  
The Honorable J. Mark Hayes, II Circuit Court Judge

S.C. SUPREME COURT

Case № 2015-CP-46-2859  
Appellate Case № 2017-002355

The State,

Petitioner,

vs.

Kenneth Morris,

Respondent.

Motion for Bond Pending Petition for Writ of Certiorari

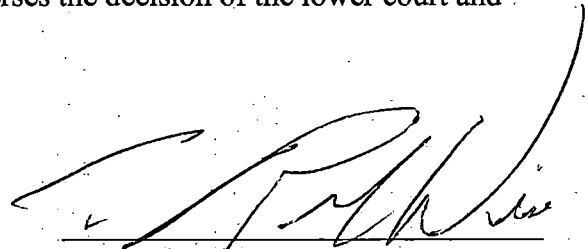
Pursuant to Rule 246 of the South Carolina Appellate Court Rules, Kenneth Morris, the Respondent herein, moves the Court for an order granting him an appeal bond in this matter pending the Petition for Writ of Certiorari filed by the state. This motion is based upon the following:

Kenneth Morris was arrested February 6, 2008 and charged with several drug charges. He was released on a bond totaling \$20,000 which consisted of four separate drug charges of \$5,000 each to be consecutive. As to the two charges related to this appeal the record from the Public Index is attached as Exhibit A. Mr. Morris was able to post bond and return to his home

in North Carolina. He fully complied with the terms of his bond. He remained out on bond until his trial which began on April 15, 2009. At trial he was sentenced to 25 years in prison.

The Honorable J. Mark Hayes, II granted the Post Conviction Relief Petition filed by Mr. Morris. The State has filed a Petition for Writ of Certiorari. Mr. Morris has filed his brief in response to the Petition of the State. The issues involved in this Petition for Writ of Certiorari are fully set forth in those documents. Mr. Morris respectfully requests that this Court grant him permission to be released on bond pending the Petition for Writ of Certiorari filed by the State. If this request is granted, Mr. Morris will return to North Carolina and live at the residence of his grandmother, Ms. Collese E. Morris, at 1719 Ann St., Wilmington, NC. His grandmother has further agreed to be willing to sign an obligation with this Court by which she will be bound to advise the Court of any violations of the terms and conditions of this bond. Furthermore, Mr. Morris, as a condition of his bond and in consideration of his returning to North Carolina, will sign a waiver of extradition in the event this Court reverses the decision of the lower court and re-instates his conviction.

May 30, 2018



C. Rauch Wise  
305 Main Street  
Greenwood, SC 29646  
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S. C. Bar № 06188

Attorney for Kenneth Morris

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S.C. SUPREME COURT

LAW OFFICE OF  
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May 31, 2018

Hon. Daniel E. Shearouse, Clerk  
Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

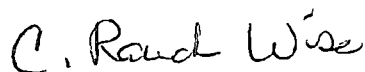
Re: Kenneth Morris vs. State of South Carolina, Appellate Case No. 2017-002355

Dear Hon. Shearouse:

I am enclosing herewith the original and six copies of the Motion for Bond Pending Petition for Writ of Certiorari together with the original Affidavit of Service regarding the above matter. Your help is greatly appreciated.

With kindest regards, I am

Very truly yours,



C. Rauch Wise

CRW/slt  
Enclosure

cc Megan Harrigan Jameson