

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Greenville County  
Perry H. Gravely, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

JAN 11 2019

SC Court of Appeals

THE STATE,

Respondent,

vs.

ANGELA PRESSLEY GREENE,

Appellant.

Appellate Case No. 2018-000066

\_\_\_\_\_  
**REPLY TO RETURN  
MOTION TO SUSPEND BRIEFING**  
\_\_\_\_\_

The State now makes its return to Appellant Greene's return to the State's motion to suspend briefing. Greene writes in her response: "The question before the trial judge was whether the police had reasonable suspicion to suspect Appellant of criminal activity in order to seize her. The police did not, as the state now admits." This is a misrepresentation of the State's pleading: the State announced its intention to not submit a brief on the matter; however, the State makes no specific admissions in this case. The State would advise this Court that the State's decision was made by making a deeper analysis of the facts and law than what was advanced by Greene in her truncated brief and determined that in total, the prudent course was to make the motion it has presented to this Court.

WHEREFORE, the State requests that briefing be stayed, and the conviction and sentence be vacated.

Respectfully submitted,

ALAN WILSON  
Attorney General

DAVID SPENCER  
Senior Assistant Attorney General

BY: 

David Spencer  
Office of the Attorney General  
S.C. Bar No 68571

Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3737

ATTORNEYS FOR PETITIONER/RESPONDENT

January 11, 2019

STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Perry H. Gravely, Circuit Court Judge

---

Appellate Case No. 2018-000066

**RECEIVED**

JAN 11 2019

**SC Court of Appeals**

THE STATE, .....RESPONDENT

v.

ANGELA PRESSLEY GREENE, .....APPELLANT.

---

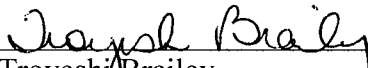
**PROOF OF SERVICE**

---

I, Troyeshi Brailey, Legal Coordinator, hereby certify that I have served the within Reply to Return Motion to Suspend Briefing, dated January 11, 2019, on Appellant by depositing two copies of the same in the United States mail, postage prepaid, addressed to his attorney of record:

Susan B. Hackett, Esquire  
S.C. Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11589  
Columbia, SC 29211-1589

I further certified that all parties required by Rule to be served have been served. This 11<sup>th</sup> day of January, 2019.

  
\_\_\_\_\_  
Troyeshi Brailey  
Legal Coordinator

Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211-1549  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

**RECEIVED**

JAN 11 2019

**SC Court of Appeals**

January 11, 2019

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Sumter Street  
Columbia, South Carolina 29201

Re: State v. Angela Pressley Greene  
Appellate Case No. 2018-000066

Dear Ms. Kitchings:

Enclosed please find an original and six (6) copies of a Reply to Return Motion to Suspend Briefing in the above case. By copy of this letter, I am serving counsel for the Appellant with a copy of the reply.

Sincerely,

David Spencer  
Senior Assistant Attorney General  
S.C. Bar No: 68571

DS/tb  
Enclosures

cc: Susan B. Hackett, Esquire (w/enclosures)  
Victim Advocacy Division