

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Post Conviction Relief

S.C. SUPREME COURT

Michael G. Nettles, Circuit Court Judge

Case No.: 2017-002269

Deonte Brown #361477,..... Petitioner,

vs.

State of South Carolina,Respondent.

REPLY TO RESPONDENT'S RETURN TO
PETITION FOR WRIT OF CERTIORARI

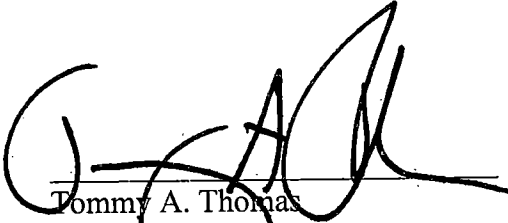
The Petitioner re-alleges the facts and issues as presented in Petitioner's Petition for Writ of Certiorari.

That the Respondent alleges in their Return to Issue III:

"The post-conviction relief court properly denied relief for the allegation that trial counsel was ineffective for challenging the bias of Detective Lawrence when Lawrence was not called as a witness by the State and he was only peripherally involved with the investigation against Petitioner. Even if trial counsel was deficient in not calling Lawrence as a witness, Petitioner suffered no prejudice from this failure."

Trial counsel did not have evidence to present a third party guilty defense and therefore, Trial Counsel agreed to not make any reference to Derrick Brown at trial.

The Petitioner believes that this is misstated. In review of both the Trial and PCR transcript, there appears to be no statement by Trial Counsel regarding Respondent's argument that Counsel agreed not to make a reference to Derrick Brown at Trial.



Tommy A. Thomas
S.C. Bar No.: 5536
Attorney for Petitioner
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Irmo, SC 29063
(803) 732-5507

April 16, 2019

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In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Post Conviction Relief

Michael G. Nettles, Circuit Court Judge

Case No.: 2017-002269

Deonte Brown #361477,..... Appellant,

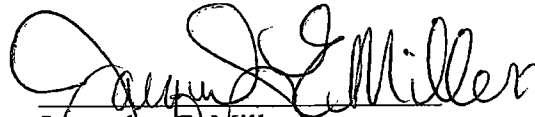
vs.

State of South Carolina,Respondent.

CERTIFICATE OF SERVICE

I, Jacquelyn E. Miller, assistant to Tommy A. Thomas, Attorney for the Petitioner,
hereby certify that I mailed a copy of the Reply to Respondent's Return to Petition for Writ of
Certiorari to Scott Matthews, Attorney for Respondent to:

Scott Matthews, Esq.
Attorney for Respondent
Attorney General's Office
P.O. Box 11549
Columbia, SC 29211-1549


Jacquelyn E. Miller
Secretary to Tommy A. Thomas
Attorney for Applicant
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S.C. SUPREME COURT

Tommy A. Thomas

ATTORNEY AND COUNSELOR AT LAW

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April 16, 2019

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

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S.C. SUPREME COURT

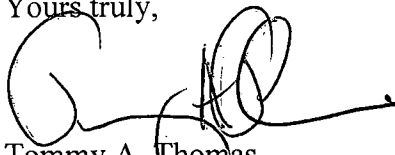
RE: Deonte Brown v. State of South Carolina
Appellate Case No.: 2017-002269

Dear Sir or Madam:

Enclosed please find for filing an original and a copy of a Reply to Respondent's Return to Petition for Writ of Certiorari and Certificate of Service.

Kindly return a clocked copy to me in the enclosed envelope. Please feel free to contact me should you have any questions. Thank you.

Yours truly,



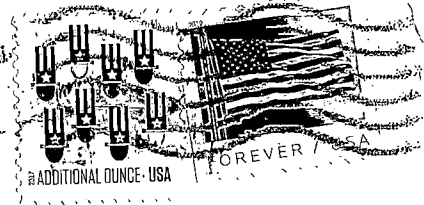
Tommy A. Thomas,
Attorney at Law

TAT/jem
cc: Scott Matthews, Esq.
Deonte Brown #361477

Tommy A. Thomas, P.C.
ATTORNEY AND COUNSELOR AT LAW
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The South Carolina Supreme Court
Clerk, Daniel Shearouse
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