

THE STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

THE STATE)

v.)

DANIEL LEE PEASE,)

DEFENDANT.)

IN THE COURT OF GENERAL SESSIONS
THIRTEENTH JUDICIAL CIRCUIT
Warrant/Indictment Nos.: 2018A2320501674;
2018A2320501675; 2018A2320501679

19-4177
MOTION TO RECONSIDER
GUILTY PLEA SENTENCE

20 DEC 17 AM 10:22
Paul Wickensimer CCC GUL SC

COMES NOW the Defendant, Daniel Eugene Pease, by and through undersigned
counsel, William E. Grove, and, pursuant to Rule 29 of the S.C. Rules of Criminal Procedure,
respectfully moves this Honorable Court to Reconsider the Order of this Court imposed on
December 10, 2020. In support of this motion, the Defendant would submit

- 1) On the above-listed date the Defendant pled guilty to Felony Driving Under the
Influence, Death Results and received a sentence of twenty years. He also pled guilty
to two counts of Felony Driving Under the Influence, Great Bodily Injury Results and
received a sentence of five years on each charge. All charges were sentenced
consecutively and the Defendant received credit for 728 days.
- 2) Defendant submits that, at the hearing, counsel failed to properly convey the
mitigation available to the Defendant. to include his family history of drug abuse.
Counsel also failed to adequately address the strong family support available to the
Defendant. Defendant maintains the severity of his sentence is based, at least in part,
on the emotional aspects of the facts surrounding his case. Defendant believes that
his plea being entered within a few days of the anniversary of the accident
inappropriately influenced the outcome of his case.

For the reasons stated above, the Defendant respectfully moves this Court to reconsider

SC Court of Appeals

APR 09 2021

RECEIVED

2021 JAN 21 PM 12:25
THIRTEENTH JUDICIAL CIRCUIT
SOLICITOR'S OFFICE

the sentence imposed on December 10, 2020.

[continued on following page]

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'William E. Grove', is written over a horizontal line.

William E. Grove
SC Bar # 77934
Attorney for Defendant
305 E. North Street
Greenville, SC 29601
(864) 467-8522

Date: December 16, 2020.