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May 24 2021

S.C. SUPREME COURT

**THE STATE OF SOUTH CAROLINA
In the Supreme Court**

**ON CERTIORARI TO THE SOUTH CAROLINA COURT OF APPEALS
Appeal from Spartanburg County
Circuit Court**

**J. Mark Hayes, II
Circuit Court Judge**

Supreme Court Case No.: 2020-001184

State of South CarolinaPetitioner,

v.

Kenneth Taylor Respondent.

AFFIDAVIT OF ZACHARY DAVID ELLIS

My name is Zachary David Ellis. I am 43 years of age and competent to execute this affidavit, which I make based on my personal experience and observation, except for statements made upon information and belief, which I believe to be true.

I represented the Respondent Kenneth Taylor before the Spartanburg County Magistrate’s Court and the Spartanburg County Circuit Court on appeal. My agreement to represent Respondent did not extend to the Court of Appeals or Supreme Court.

After the September 12, 2016, hearing affirming the Magistrate’s dismissal, I lost contact with Mr. Taylor. I attempted to reach him multiple times via telephone and mail, but I was unable to do so. I hired a private investigator to visit his last known residence (26-C Oakland Avenue,

Inman, SC 29349) and found he no longer resided there. My investigator's conversations with Mr. Taylor's neighbors revealed that he had moved away. Upon information and belief, it is possible that Mr. Taylor is now in New Jersey.

Based on my inability to contact Mr. Taylor, I am informed and believe he has not received any notice of the actions before the South Carolina Supreme Court or South Carolina Court of Appeals.


I support Mr. Luck's request to be appointed guardian ad litem of Mr. Taylor, as the Magistrate, Circuit, and Court of Appeals' decisions were correct, and Mr. Taylor needs representation before the South Carolina Supreme Court to provide him due process of law.

Further affiant sayeth naught.


Zachary David Ellis (S.C. Bar # 71919)
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Greenville, SC 29601
864.991.8738
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SWORN TO AND SUBSCRIBED BEFORE ME

This 24 Day of May, 2021

 (SEAL)
PRINT NAME: Kelly LuRhonda Cox
NOTARY PUBLIC FOR: South Carolina
My Commission Expires: 09-22-2027

