

Farmer Hayes, #293544

State of South Carolina ^{6/21}
in the Supreme Court

VS.

State of South Carolina,

Appellate Case No.

2021-000445

Respondent.

Written Memorandum

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APR 26 2022

SC Court of Appeals

Statement of Facts

In the matter of Hayes vs. State, App. Case No. 2021-000445; In the App. Court Rules of Court Rule 407.1.4, Rules of Professional Conduct; A LAWYER'S RESPONSIBILITIES: As an Advocate, a lawyer zealously asserts the client's position under the rules of the Adversary System. As Negotiator, a lawyer seeks a result advantageous to the client but consistent with requirements of honest dealing with others. As intermediary between clients, a lawyer seeks to reconcile their divergent interests as an advisor and, to a limited extent, as a spokesperson for each client. A lawyer acts as evaluator by examining a client's legal affairs and reporting about them to the client or to others.

In "All" professional functions a lawyer should be competent, prompt and Diligent. A lawyer should maintain

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HAYES-293544

Communication with a Client Concerning the Representation. A Lawyer should keep in Confidence information relating to representation of a client except so far as disclosure is required or permitted by the Rules of Professional Conduct or other Law.

Argument

During App p.c.r. hearing on 3/11/21. The p.c.r. Court incorrectly found Appellate Counsel was not ineffective where she admittedly failed to communicate with pet. (see Evidentiary hearing pg. 34, L. 6.) ms. Carter acknowledged she did not recall ever having talked to petitioner on the telephone and in contrast talked with former Appellate Counsel, Strom about his case often. former Appellate Counsel Strom corroborated petitioner's testimony and stated that they had regular communications and that petitioner was an "engaged client". The Rules of Professional Conduct provides that a Lawyer shall "reasonably consult with a client about the means by which the client's objectives are to be accomplished." "Keep client reasonably informed about the status of the matter, and

Promptly Comply With Reasonable Requests for Information,
S.C. App. Ct. R. Rule 407 RPC 1.4.

Appellant Sabely requests for equal judgmental fairness
AND An Equal Bite of the Apple. App. has been
In Carceral since 8/3/07, serving A (25) yrs sentence, Appellate
Sabely requests for A Reconsideration of Sent. or Case to be
Reverse AND Remanded to Lower Court for new Trial.

Respectfully,

LORRIE FORD
Notary Public - State of South Carolina
My Commission Expires
December 31, 2031

Alvin Ford
4/2/22

[Handwritten signature]

Laurian Hayes #293544
Rt. 11, #63
4848 Goldmine Hwy,
Kershaw, S.C. 29607

COLUMBIA, SC 290
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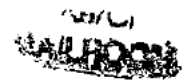


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