

STATE OF SOUTH CAROLINA)
COUNTY OF HORRY)

IN THE GENERAL SESSIONS COURT
FIFTEENTH JUDICIAL CIRCUIT

State of South Carolina,)

Plaintiff,)

vs.)

Tammy Caison Moorers,)

Defendant.)

NOTICE OF MOTION AND MOTION
TO LIFT GAG ORDER

HORRY COUNTY
2015 JAN 27 PM 1:01
CLERK OF COURT

Re: **State of South Carolina vs. Tammy Caison Moorers**

Indecent Exposure, Warrant No.: 2014A2611000021, Indictment No.: 2014GS2601129

Indecent Exposure, Warrant No.: 2014A2611000027, Indictment No.: 2014GS2601130

Incident Date: December 17, 2013

Arrest Date: February 22, 2014

Arresting Officer: T. Large, HCPD

Obstructing Justice, Warrant No.: 2014A2611000026, Indictment No.: 2014GS2601128

Incident Date: December 20, 2013

Arrest Date: February 22, 2014

Arresting Officer: T. Large, HCPD

Kidnapping, Warrant No.: 2014A2610200461, Indictment No.: 2014GS2601127

Incident Date: December 18, 2013

Arrest Date: February 23, 2014

Arresting Officer: J. Cauble, HCPD

Murder, Warrant No.: 2014A2610200464, Indictment No.: 2014GS2601126

Incident Date: December 18, 2013

Arrest Date: February 24, 2014

Arresting Officer: J. Cauble, HCPD

Medicaid Fraud, Warrant No.: 2014A2610700584, Indictment No.: 2014GS2602619

False Pretenses, Warrant No.: 2014A2610700585, Indictment No.: 2014GS2602620

Arrest Date: June 3, 2014

Arresting Officer: J. Evans, Jr., SC Attorney General's Office

PLEASE TAKE NOTICE that the Defendant, Tammy Caison Moorers, by and through her undersigned attorney, will move before this Court within ten (10) days from the date hereof or as soon thereafter as counsel can be heard, for an Order requesting the Honorable R. Markley

Dennis, Jr., Circuit Court Judge, reconsider the March 21, 2014 Order Prohibiting Extrajudicial Statements and Release of Documents.

The Defendant requests that this Honorable Court hear substantial grounds for relief relating to the Order and the State's reliance on secrecy throughout this judicial process.

In compliance with Judge John's March 21, 2014 Order Prohibiting Extrajudicial Statements and Release of Documents, a Memoranda of Facts and Law will be forwarded to the Court under seal for the Court's consideration. This Memoranda of Facts and Law is being furnished to the State.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Greg McCollum', is written over a horizontal line.

Greg McCollum
Complete Legal Defense Team
1012 38th Avenue North, Suite 202
Myrtle Beach, South Carolina 29577

January 23, 2015
Myrtle Beach, South Carolina

GREG McCOLLUM
COMPLETE LEGAL DEFENSE TEAM
www.CriminalLawyerMyrtleBeach.com
(843) 626-5480

January 23, 2015

The Honorable Melanie Huggins
Horry County Clerk of Court
Post Office Box 677
Conway, South Carolina 29526

Horry County
2015 JAN 27 PM 1:01
MELANIE HUGGINS
CLERK OF COURT

Re: **State of South Carolina vs. Tammy Caison Moorer**

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Dear Melanie:

Please find enclosed an original Notice of Motion and Motion to Lift Gag Order and three (3) copies of it regarding the above-referenced matters. If you would return the copies in

1012 38th Avenue North, Suite 202, Myrtle Beach, SC 29577

the self-addressed stamped envelope and return them to our office. I would greatly appreciate it.
Thank you for your assistance and cooperation in this matter.

With warm regards, I remain,

Yours truly,

A handwritten signature in black ink that reads "Michelle Schmalfeldt". The signature is written in a cursive, flowing style.

Michelle Schmalfeldt
Paralegal to Greg McCollum

Enclosures

cc: The Honorable R. Markley Dennis, Jr. (via email)
Nancy Livesay, Assistant Solicitor (via email)
Kirk Truslow, Esq. (via email)
Tammy Moorer (via U.S. Mail)