

STATE OF SOUTH CAROLINA

RECEIVED

COURT OF APPEALS

FEB 24 2023

SC Court of Appeals

Appeal from Horry County  
Larry B. Hyman, Jr., Circuit Court Judge  
Appellate Case No. 2020-001497

The State, Respondent  
vs.  
Theodore Jerry Bolick, Appellant

OBJECTION TO MOTION TO REQUIRE  
AMENDED RECORD ON APPEAL

Appellant would like to point out to  
to this Honorable Court that the Respondent's  
(William M. Blich) latest motion, the Motion  
To Require Amended Record On Appeal is  
just another pretextual ploy to delay these  
proceedings unnecessarily.

Appellant filed contemporaneously  
with the Record On Appeal an Appendix  
To The Record On Appeal which contains  
the September 16, 2020 hearing trans-  
cript, the May 18, 2018 hearing transcript,

and the Memorandum Supporting State's Motion for Reconsideration, (the complained of documents). Just as Appellant filed the Appendix To The Record On Appeal, he supplied Respondent a copy, and filed a Proof of Service for the Appendix To The Record On Appeal. Therefore, the documents the Respondent complains of <sup>are</sup> part of this court's record in this case and are easily available for this Honorable Court's viewing. Moreover, the Respondent cannot show how the Appellant's filing of the Record On Appeal will prejudice the Respondent in any way, or a compelling need for this proposed amendment. There are no relevant documents pertaining to any issues raised and argued on appeal that have not been made available to the court for consideration.

The Respondent also seems to take issue with the way Appellant numbered the transcript pages. Appellant numbered the Trial Transcript from July 22-24, 2019 58, and the following pages 58-1, 58-2, and so on. These numbers are sequential

and consecutive, and easy to follow. Just because Mr. Blich takes issue with the way Appellant numbered them does not mean they are not in compliance with SCACR, Rule 210(c). Merriam-Webster Dictionary defines consecutive,

"following one after the other in a series; following each other without interruption."

The Appellant's submission does exactly that. Moreover, and here again, Mr. Blich cannot show how Appellant's numbering system has prejudiced the Respondents in any way, or how it would impair or impede this Honorable Court's ability to consider the issues presented.

Finally, Respondent takes issue with the Appellant having inadvertently written an obvious truth on page 50 of the Record on Appeal. Appellant did this in preparation for a hearing the trial court had no jurisdiction

or authority to hold, and to remind Appellant of the multitude of falsehoods the state proffered the trial court to get the proverbial second bite at the apple after the term of court had expired. This was done in March of 2021, and Appellant does not have a copy of this document without the comment. Although the comment is improper, it is a harmless error that this Honorable Court, in its discretion, can overlook and decide the relevant issue of, was the Motion For Recalculation after the term of court had expired in a post-verdict motion ruling even proper.

Again, Respondent cannot show how this simple harmless error would prejudice them, or how it would impede or impair this Honorable Court from properly considering the issues presented.

In closing, Appellant would point out to this Honorable Court that Respondent is again seeking to delay these proceedings unnecessarily.

In seeking five extensions of time to file Respondent's Initial Brief, the Respondent never alleged an extraordinary circumstance for these extensions. Then when the Respondent did finally file the Respondent's Initial Brief it was mendacious in nature, and even contained an oxymoronic argument in regards to Rule 29, SCR Crim P, that the post-trial Rule 29 law was to be applied to a motion that was not post-trial, only post verdict.

However, in this latest motion the Respondent manifests their hypocrisy in following rules. If the Respondent had followed the rules along with his subordinates, this case would not be before this court now. Although the Respondent may argue eloquently, his arguments are mendacious in nature and hypocritical.

CONCLUSION

WHEREFORE: Appellant moves

this Honorable Court to deny the Respondent's Motion To Require Amended Record On Appeal, or in the alternative, order Respondent to demonstrate any prejudice they will suffer if the amendment is not allowed.

Respectfully Submitted  
This 17<sup>th</sup> day of February 2023  
Theodore Bolick pro se  
Evans Correctional Inst.  
610 Highway #9 West  
Bennettsville, S.C. 29512

STATE OF SOUTH CAROLINA RECEIVED

FEB 24 2023

COURT OF APPEALS

SC Court of Appeals

Appeal from Horry County  
Larry B. Hyman, Jr., Circuit Court Judge  
Appellate Case No. 2020-001497

The State

Respondent

VS

Theodore J. Bolick

Appellant

PROOF OF SERVICE

I hereby certify I placed a copy of  
the Objection To Motion To Require  
Amended Record On Appeal in the U.S.  
Mail, postage pre-paid, addressed,

William M. Blich

P.O. Box 11549

Columbia, S.C. 29211-1549

February 17, 2023


Theodore Bolick

610 Highway # 9 West

Beaufortville S.C. 29512

Theodore Bolick 384070  
Evans Correctional Inst.  
610 Highway # 9 West  
Bennettsville, S.C. 29512



Legal Mail  
US POSTAGE SM PITNEY BOWES  
  
ZIP 29512 \$ 000.60<sup>0</sup>  
02 4W  
0000378442 FEB. 21. 2023

**RECEIVED**

FEB 24 2023  
SC Court of Appeals

Clerk, Court of Appeals

P.O. Box 11629  
Columbia, S.C. 29211

29211629 5032

