

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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MAR 10 2023

Appeal from Administrative Law Court
The Honorable Deborah Brooks Durden, Administrative Law Judge

SC Court of Appeals

Appellate Case No. 2022-001585

MATTHEW WILLIAMS, #215077..... APPELLANT

v.

S.C. DEPARTMENT OF PROBATION, PAROLE AND
PARDON SERVICES.....RESPONDENT

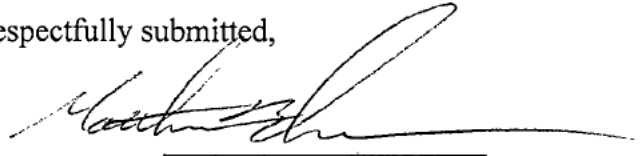
MOTION TO SUPPLEMENT RECORD ON APPEAL

Comes now Matthew C. Buchanan, General Counsel for the South Carolina Department of Probation, Parole and Pardon Services, on behalf of Respondent, and moves pursuant to Rule 212(b), SCACR, to supplement the Record on Appeal.

On February 22, 2023, Appellant filed the Record on Appeal; however, Respondent inadvertently omitted from the Designation of Matter several documents that were both presented to the lower court and specifically referenced in the Initial Brief of Respondent. With the consent of Appellant (see attached emails), Respondent moves to have these documents included in a Supplemental Record on Appeal that was filed with the Court on February 27, 2023.

Signature follows.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew C. Buchanan", written over a horizontal line.

Matthew C. Buchanan
General Counsel

South Carolina Department of Probation,
Parole and Pardon Services
P.O. Box 207
Columbia, South Carolina 29202
(803) 734-9220

Columbia, South Carolina
March 7, 2023

Jessica Kinard

From: Charles West <charles.west@nelsonmullins.com>
Sent: Friday, February 24, 2023 3:46 PM
To: Jessica Kinard; Axton Crolley; sandrews@burnetteshutt.law;
shansotia@rootandrebound.org; Kelli Eargle
Cc: Dawn K. Nichols; Matthew Buchanan
Subject: RE: Matthew Williams, 2022-001585

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Jessica,

We consent. Have a good weekend!

-Charles

From: Jessica Kinard <Jessica.Kinard@ppp.sc.gov>
Sent: Thursday, February 23, 2023 3:53 PM
To: Charles West <charles.west@nelsonmullins.com>; Axton Crolley <axton.crolley@nelsonmullins.com>;
sandrews@burnetteshutt.law; shansotia@rootandrebound.org; Kelli Eargle <kelli.eargle@nelsonmullins.com>
Cc: Dawn K. Nichols <Dawn.Nichols@ppp.sc.gov>; Matthew Buchanan <Matthew.Buchanan@ppp.sc.gov>
Subject: Matthew Williams, 2022-001585

◀**External Email**▶ - From: Jessica.Kinard@ppp.sc.gov

Good afternoon –

In preparing our final brief in the Matthew Williams matter, I realized that two documents we referenced were not included in the record on appeal. I am seeking your consent to add them as a supplemental record on appeal. We will take on the burden of creating and distributing all necessary copies, should you consent.

These documents are:

Appellant's Response in Opposition of Respondent's Motion to Dismiss, dated February 17, 2022
Order Denying Motion to Dismiss and Order to Supplement Record, dated May 16, 2022

This will not alter anything in our final brief, as required by rule, other than allow us to add citations. Please let me know via email if you will consent to this addition.

Thank you –
Jessica

Jessica E. Kinard
Legal Counsel
SC Department of Probation, Parole and Pardon Services
(803) 734-9283

Culture: That which has been planted has been allowed to grow!

The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

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MATTHEW WILLIAMS, #215077..... APPELLANT

v.

S.C. DEPARTMENT OF PROBATION, PAROLE AND
PARDON SERVICES,.....RESPONDENT

CERTIFICATE OF SERVICE

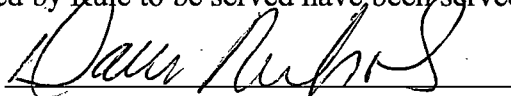
I, Dawn K. Nichols, Executive Assistant, hereby certify that I have served the within
Motion to Supplement the Record on Appeal on Appellant this 7th day of March, 2023, by
depositing a copy of the same in the United States mail, postage prepaid, addressed to:

Charles West, Esquire
1320 Main Street, 17th floor
Columbia, S.C. 29201

Stuart Andrews, Jr., Esquire
PO Box 1929
912 Lady Street
Columbia, S.C. 29202

Shirene Hansotia, Esquire
222 4th Avenue
Mount Pleasant, S.C. 29464

I further certify that all parties required by Rule to be served have been served.



Dawn K. Nichols
Executive Assistant
South Carolina Department of Probation,
Parole, and Pardon Services
P. O. Box 207
Columbia, South Carolina 29202

State of South Carolina
Department of Probation, Parole and Pardon Services

HENRY McMASTER
Governor



JERRY B. ADGER
Director

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MAR 10 2023
SC Court of Appeals

March 7, 2023

The Honorable Jenny Kitchings
Clerk of the S.C. Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

Re: Matthew Williams, #215077 v. SCDPPPS
22-001585

Dear Ms. Kitchings:

Per the Court's letter of March 6, 2023, please find enclosed a Motion to Supplement the Record on Appeal Dated March 7, 2023, along with proof of service in the above referenced case.

Sincerely,

A handwritten signature in cursive script that reads "Matthew C. Buchanan".

Matthew C. Buchanan
General Counsel

MCB:dn

Enclosures

cc: Charles West, Esquire
Stuart Andrews, Esquire
Shirene Hansotia, Esquire



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