

STATE OF SOUTH CAROLINA
COUNTY OF WEST COLUMBIA

THE STATE

VS

MORGAN DAYLE CARR

GENERAL SESSION COURT

2019-GS-32-01131; 2019-GS-32-01133

The (Defendant) files this

NOTICE & MOTION to Compell
the Discovery Evidence.

AFFIDAVIT OF SERVICE

The Above-captioned (Defendant) hereby moves upon the
above court, on said motion, for Discovery Evidence in
this case at bar.

Pursuant to S.C. Rule Crimp Rule 5@ Discovery must be
given within (30) days after request.

Also pursuant to Federal Rule C.P. Rule 26(b)(2)(B).
Federal R.C.P. Rule 12.7

Thanking you in advance for your prompt response
in this manner.

RECEIVED

DEC 04 2023

Morgan SC Court of Appeals

MOC

November 27, 2023

SWORN TO AND SUBSCRIBE BEFORE ME
ON November 27, 2023

NOTARY PUBLIC FOR THE STATE OF SOUTH CAROLINA

Camilla Y. [Signature]

MY COMMISSION EXPIRES = 10/10/24

Morgan Dayle Carr #390885

Leath Correctional Institution

M-4-206x

2809 Airport Road

Greenwood, SC 29049

Memorandum

November 27, 2023

VIA-Certified Delivery

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DEC 04 2023

SC Court of Appeals

S.C. Courts of Appeal

P.O. Box ~~1530~~ 11629

Columbia, SC 29211

RE: The (Appellant) files this Memorandum to Compell the above court, to provide a photo copy of the Intent to Appeal notice.

Statement Of Fact

The Appellant's trial counsel failed to provide the (appellant) with a photo copy of the Notice of Intent to Appeal.

Pursuant to the 6th Amendment, U.S.C.A. Trial Counsel are required to disclosure of all material facts, notices and appeals must be given to the Defendant/

The South Carolina Courts of Appeals

MEMORANDUM

Appellant. Quoting → CARA HARDING - VS - ROBERT MANCE 9-04-2013, 405, S.C. 431, 748, S.E. 2d. 276.

SIXTH AMENDMENT U.S.C.A, Appellant Counsel can be held (Ineffective) for failing to raise an arguable issue on Appeal. Quoting → Ezell - VS - STATE, 345, S.C. 312, 548, S.C. 2d. 852. In Ezell - VS - STATE, the Supreme Court held that a new trial was granted.

The Appellant Counsel of Defense cannot be held liable for raising an issue, that was NOT (preserved) on record of Appeal. Quoting → SOUTHERNLAND - VS - STATE, 337, SC. 610, 524, S.E. 2d. 8.33 (1999) The Supreme Court ruled in STUCKEY - VS - APPELLANT DEFENSE COUNSEL, ROBERT D. DURKEE. (STUCKEY - V - STATE) 337. S.C. 56, 508. S.E. 2d. 564. In STATE - V - STUCKEY → THE Supreme Court held that (HYBRID-REPRESENTATION) was not allowed in the Supreme Court. The Supreme Court "Ruled" (that (Appellant) Defense Attorney) must allow the (Appellant) to submit any issues they have to be considered for review before the filing of the (Appellants) brief.

The (Appellant) has a genuine concern about the (issues) that was preserved for review on Appeal, by trial counsel.

Questions Presented

- ① Who is responsible for providing the (Appellant) with a photo copy of the Notice of Intent to Appeal.
- ② Whether the (Appellant) would be allowed to file a motion to amend the pleadings, to perfect her issues on Appeal.

MEMORANDUM

THE SOUTH CAROLINA COURTS OF APPEALS

THE STATE

VS

MORGAN DALE CARR

AFFIDAVIT

OF

SERVICE

FINAL ARGUMENT

Whether Trial Counsel submitted an defensive & deffective appeal Notice of Intent to Appeal.

Whether Appellant Counsel was aware that trial counsel failed to present an issue on Appeal that would require a motion for a new trial or a motion to set aside the order of Judgment, pursuant to

S.C.R.C.P Rule 590, or whether a notice was filed. A motion not withholding the verdict of NOT GUILTY.

Morgan D. Carr

[Signature]

NOVEMBER 27, 2023

Sworn to and Subscribe before me

On this Day of November 27, 2023

Notary Public for the State of South Carolina

[Signature]

My Commission Expires = 11/14/24

SOUTH CAROLINA COURT OF APPEALS

AFFIDAVIT OF SERVICE

THE STATE

VS.

MORGAN DAILE CARR

2019-GS-32-01131; 2019-GS-32-01133

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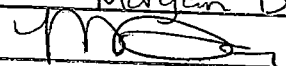
DEC 04 2023

SC Court of Appeals

I certify under penalty of perjury, that all parties have been officially notified of the Memorandum in this case at bar.

① South Carolina Courts of Appeals
P.O. Box ~~11629~~ 11629
Columbia, SC 29211

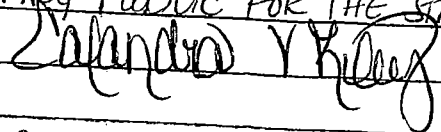
② Lexington County of Clerk of Court
205 East Main Street
Lexington, SC 29072

Morgan D. Carr


NOV. 27, 2023

~~③ General Sessions Court
1701 Main Street #205
Columbia, SC 29201~~

SWORN TO AND SUBSCRIBE BEFORE ME
ON November 27, 2023

NOTARY PUBLIC FOR THE STATE OF SOUTH CAROLINA


MY COMMISSION EXPIRES 3/31/2024

Morgan Cam #540880
M4-206X
Leath Correctional Institution
2809 Airport Road
Greenwood, SC 29649

GREENVILLE SC 296

Legal Mail
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