

From: [D Farnsworth](#)
To: [Lauren Lipscomb](#); [Court Of Appeals Filings](#)
Subject: Fwd: State v. Padgett - Notice of Appeal
Date: Tuesday, March 12, 2024 12:15:55 AM
Attachments: [Padgett Condensed \(Notice of Appeal, Proof of Service and Coverletter attached\).pdf](#)
[sentencing sheet.pdf](#)
[DANS COVERLETTER TO COURT OF APPEALS RE FILING.pdf](#)

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Additionally, please see cover letter to madam clerk, notice of appeal served on counsel for the respondent, and other documents sent in the previous emails. Thank you

Daniel J. Farnsworth, Jr.
PETTUS | FARNSWORTH, LLC

INJURY LAW and WRONGFUL DEATH
NURSING HOME ABUSE and NEGLECT

CRIMINAL LAW and DUI DEFENSE
POLICE MISCONDUCT

EMPLOYMENT LAW
and BUSINESS LITIGATION

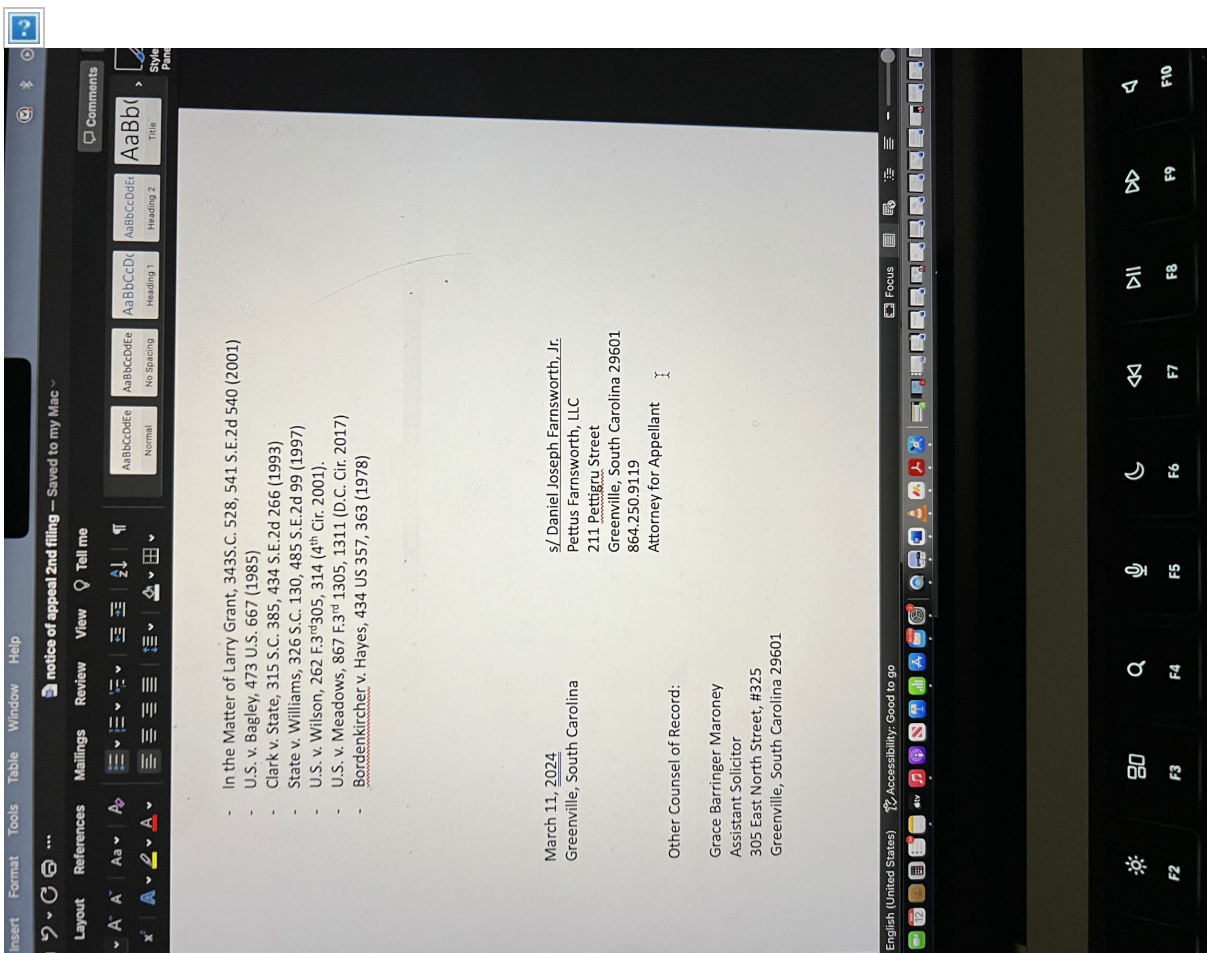
South Carolina Office:
Post Office Box 8719
Greenville, South Carolina
864.250.9119

Virginia Office:
201 King Street
Keysville, Virginia
434.736.8171

CONFIDENTIALITY NOTICE: This email, including any attachments, contains information which may be attorney work product, confidential, and/or privileged. The information herein above is intended solely for the use of the individual or entity above-named. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is prohibited. If you have received this email in error, please notify the sender immediately via "reply to sender only" and destroy all electronic and hard copies of the communication, including attachments.

----- Forwarded message -----
From: **D Farnsworth** <Dan@farnsworthlawoffices.com>
Date: Tue, Mar 12, 2024 at 12:10 AM
Subject: Re: State v. Padgett - Notice of Appeal

To: <ctappfilings@sccourts.org>



Daniel J. Farnsworth, Jr.
PETTUS | FARNSWORTH, LLC

INJURY LAW and WRONGFUL DEATH
NURSING HOME ABUSE and NEGLECT

CRIMINAL LAW and DUI DEFENSE
POLICE MISCONDUCT

EMPLOYMENT LAW
and BUSINESS LITIGATION

South Carolina Office:
Post Office Box 8719
Greenville, South Carolina
864.250.9119

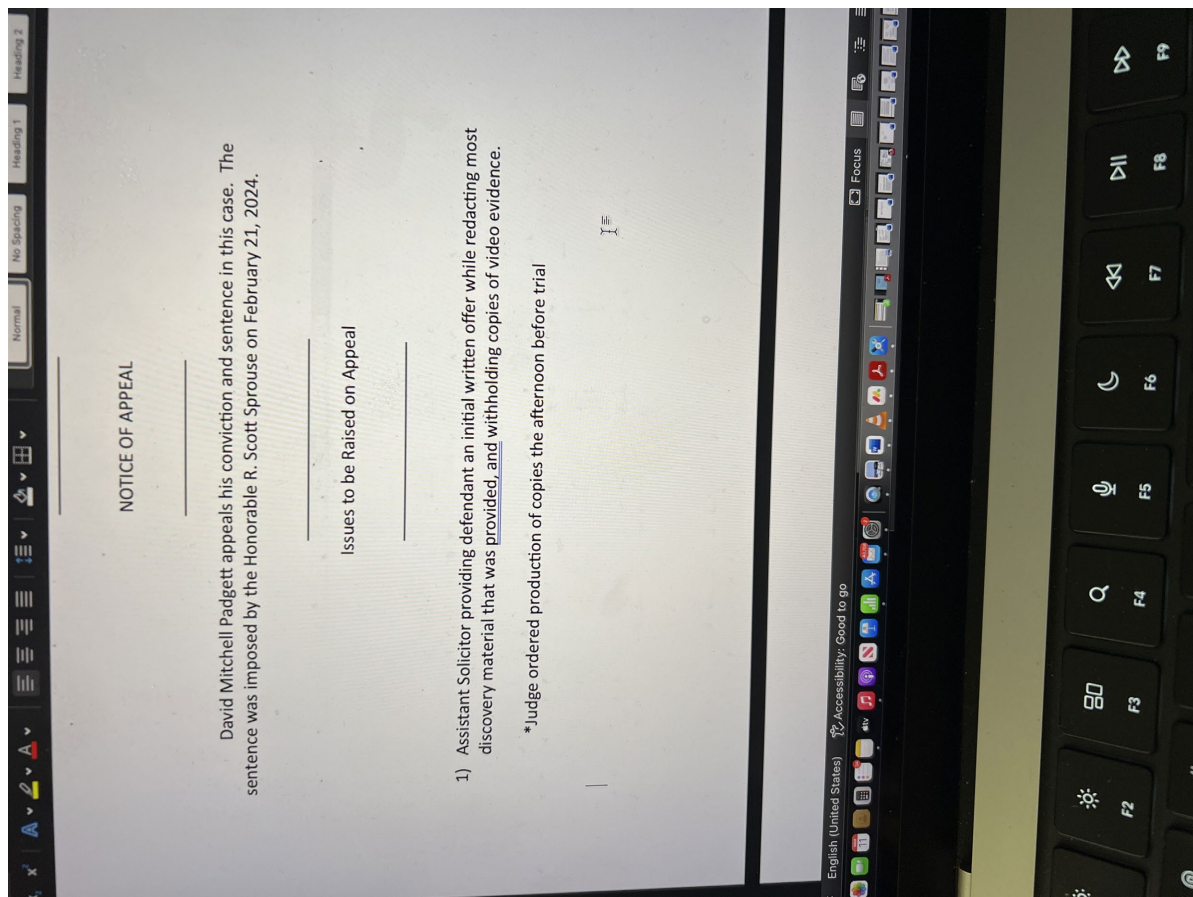
Virginia Office:
201 King Street

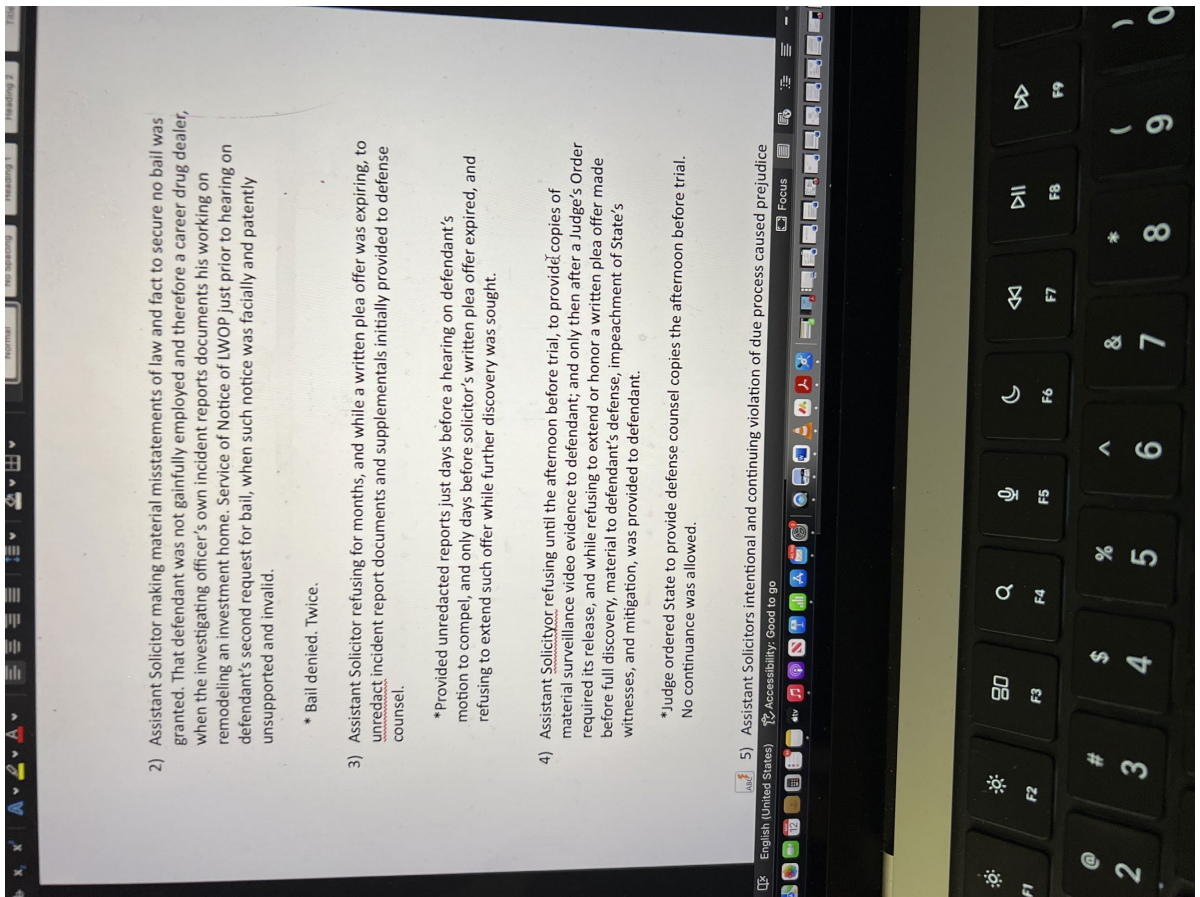
Keysville, Virginia
434.736.8171

CONFIDENTIALITY NOTICE: This email, including any attachments, contains information which may be attorney work product, confidential, and/or privileged. The information herein above is intended solely for the use of the individual or entity above-named. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is prohibited. If you have received this email in error, please notify the sender immediately via "reply to sender only" and destroy all electronic and hard copies of the communication, including attachments.

On Tue, Mar 12, 2024 at 12:06 AM D Farnsworth <Dan@farnsworthlawoffices.com> wrote:
Please see attached for filing

Thank you





- 2) Assistant Solicitor making material misstatements of law and fact to secure no bail was granted. That defendant was not gainfully employed and therefore a career drug dealer, when the investigating officer's own incident reports documents his working on remodeling an investment home. Service of Notice of LWOP just prior to hearing on defendant's second request for bail, when such notice was facially and patently unsupported and invalid.
 - * Bail denied. Twice.
- 3) Assistant Solicitor refusing for months, and while a written plea offer was expiring, to unredact incident report documents and supplementals initially provided to defense counsel.
 - * Provided unredacted reports just days before a hearing on defendant's motion to compel, and only days before solicitor's written plea offer expired, and refusing to extend such offer while further discovery was sought.
- 4) Assistant Solicitor refusing until the afternoon before trial, to provide copies of material surveillance video evidence to defendant; and only then after a Judge's Order required its release, and while refusing to extend or honor a written plea offer made before full discovery, material to defendant's defense, impeachment of State's witnesses, and mitigation, was provided to defendant.
 - * Judge ordered State to provide defense counsel copies the afternoon before trial. No continuance was allowed.

5) Assistant Solicitors intentional and continuing violation of due process caused prejudice

Daniel J. Farnsworth, Jr.
PETTUS | FARNSWORTH, LLC

INJURY LAW and WRONGFUL DEATH
NURSING HOME ABUSE and NEGLECT

CRIMINAL LAW and DUI DEFENSE
POLICE MISCONDUCT

EMPLOYMENT LAW
and BUSINESS LITIGATION

South Carolina Office:
Post Office Box 8719
Greenville, South Carolina
864.250.9119

Virginia Office:
201 King Street
Keysville, Virginia
434.736.8171

CONFIDENTIALITY NOTICE: This email, including any attachments, contains

information which may be attorney work product, confidential, and/or privileged. The information herein above is intended solely for the use of the individual or entity above-named. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is prohibited. If you have received this email in error, please notify the sender immediately via "reply to sender only" and destroy all electronic and hard copies of the communication, including attachments.