

**RECEIVED**

**May 28 2024**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Charleston County  
Honorable Bentley Price, Circuit Court Judge  
Appellate Case Tracking No. 2023-000590

---

THE STATE,

Appellant,

vs.

JUAN MANUEL RAMIREZ-SANDOVAL,

Respondent.

---

**MOTION TO FILE AN AMENDED RECORD ON APPEAL**

---

Undersigned counsel respectfully moves for this Court to allow Appellant to amend the record on appeal in this case and allow Appellant to file the “Timeline History for State v. Juan M. Ramirez-Sandoval” that was originally attached to the filed Order of Dismissal. In support of this motion, the undersigned would show this Court:

I.

Appellant served and filed his record on appeal on May 17, 2024. Appellant has yet to serve his Final Brief of Appellant. The undersigned submitted the record on appeal in good faith that the record constituted a complete and properly redacted record of the items included by the parties in their designation of matter.

II.

On Thursday, May 23, 2024, undersigned counsel became aware that the “Timeline History for State v. Juan M. Ramirez-Sandoval” which was filed with the Charleston County Clerk of

Court's Office attached to the Order on Defense Motion for Speedy Trial and for Dismissal, which was designated by both Appellant and Respondent, was inadvertently left out of the Record on Appeal. The "Timeline History for State v. Juan M. Ramirez-Sandoval" was saved separately within our digital filing system and as a result was not included in the Record on Appeal. Counsel has contacted the Charleston County Clerk of Court's Office to ensure the "Timeline History for State v. Juan M. Ramirez-Sandoval" was filed with the Order on Defense Motion for Speedy Trial and for Dismissal.

III.

Inasmuch as Rule 210, SCACR, requires that the record on appeal include all matter designated by any party, undersigned counsel moves to amend the record to add the missing "Timeline History for State v. Juan M. Ramirez-Sandoval." Simultaneously with this motion, undersigned counsel is filing such an amended record on appeal.

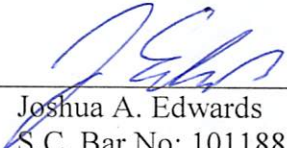
WHEREFORE, Respondent prays that the Court accept service and filing of the Amended Record on Appeal; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

JOSHUA A. EDWARDS  
Assistant Attorney General

By: \_\_\_\_\_

  
Joshua A. Edwards  
S.C. Bar No: 101188  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

May 28, 2024

**RECEIVED**

**May 28 2024**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

---

Appeal from Charleston County  
Honorable Bentley Price, Circuit Court Judge  
Appellate Case Tracking No. 2023-000590

---

THE STATE,

Appellant,

vs.

JUAN MANUEL RAMIREZ-SANDOVAL,

Respondent.

---

**PROOF OF SERVICE**

---

I, Grace Sommer, certify that I have served the within Motion to File Amended Record on Appeal and Amended Record on Appeal on Lara M. Caudy, Esquire, counsel of record for Respondent, by sending electronic mail to the address listed for counsel in AIS.

I further certify that all parties required by Rule to be served have been served.  
This 28<sup>th</sup> day of May, 2024.



GRACE SOMMER

Legal Assistant

Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727

# Message

## Message Header

**Message ID** NAe40rFH91T26GFChk89jz

**From** gracesommer@scag.gov

**To** lcaudy@scdd.sc.gov, smcmlns@scdd.sc.gov

**Cc** jedwards@scag.gov, ccollins@scag.gov, gracesommer@scag.gov

**Bcc** gracesommer@scag.gov *(BCCs will not be shown to recipients)*

**Subject** The State v. Juan Manuel Ramirez-Sandoval (2023-000590)

**Authorization** Only Specified Recipients can access

**Message Sent** May 28, 2024 11:01

**Message Expires** June 27, 2024



## Message

Good Morning Ms. Caudy,

Attached please find a Motion to File an Amended Record on Appeal, Amended Record on Appeal, and Final Brief of Appellant in The State v. Juan Manuel Ramirez-Sandoval (2023-000590). These documents will be filed with the Court of Appeals via the AIS OneDrive System.

If you will, please confirm receipt of this email.

Thank you,

**Grace Sommer**, Legal Assistant  
South Carolina Attorney General's Office

Criminal Appeals | Office 803-734-3835 | [gracesommer@scag.gov](mailto:gracesommer@scag.gov)  
P.O. Box 11549 | Columbia, SC 29211  
[scag.gov](http://scag.gov)

## Attached Files

SANDOVAL Juan - Amended ROA (035892613XD2C78).PDF	29 MB		Download
SANDOVAL Juan - FBOA (03588839XD2C78).PDF	1.4 MB		Download
SANDOVAL Juan - Motion to File an Amended Record on Appeal (035888275XD2C78).PDF	410 KB		Download
3 Files			31.2 MB

Download Attachment Details (csv)

Download All