

IN THE STATE OF SOUTH CAROLINA

CERTIFICATE OF SERVICE

I, the undersigned, Matthew Fullbright, SCDC# 349468 do hereby certify that I have this date served the foregoing two page letter to Susan Hackett, Esq. requesting stay/abeyance pending of appeal until a reconstruction of the Nov. 17, 2011 Jackson v. Denno can be held; and one page to the below addressing same. On the below party(ies) by depositing a copy of the same into the UNITED STATES mail, postage prepaid, addressed to:

<u>Susan Hackett, Esq.</u>	<u>Clerk of Court</u>	<u>Attorney General's Office</u>
<u>SCC10/Div. of App. Def.</u>	<u>S.C. Court of Appeals</u>	<u>1000 Assembly St.</u>
<u>P.O. Box 11589</u>	<u>P.O. Box 11629</u>	<u>Columbia, SC 29211</u>
<u>Columbia, SC 29211-1589</u>	<u>Columbia, SC 29211</u>	

<u>S.C. Court of Admin.</u>	<u>Marshall Fullbright</u>	<u>10th Cir. Solic's Office</u>
<u>1015 Sumter St., Suite 200</u>	<u>106 Dogwood Dr.</u>	<u>P.O. Box 8002</u>
<u>Columbia, SC 29201</u>	<u>Belton, SC 29627</u>	<u>Anderson, SC 29622</u>

<u>Daniel Shearouse, Clerk</u>		
<u>Supreme Court of SC</u>		
<u>P.O. Box 11330</u>		
<u>Columbia, SC 29211</u>		

The two page to Ms. Hackett is included to each address and the one page is also included to each address.

Date: 19 August 2013

s/ Matthew Fullbright
Matthew Fullbright SCDC# 349468
Lieber Corr. Inst.
Dorm: Ashley - B-49
P.O. Box 205
Ridgeville, SC 29472

Re: Appellate Case No.: 2012-207553

RECEIVED
AUG 22 2013
SC Court of Appeals

Re: Appellate Case No.: 2012-207553

Date: 15 August 2013

Dear Appropriate Person:

I am including this letter to each of you listed on the Certificate of service collectively as a whole, so as to put you all on the same page so we can remedy this matter easily.

I request that you clock stamp each page included: the Certificate of service, the two page letter to Susan Hackett, as well as this one page request and the other one page request.

Thank You,

~~S/ Matthew Fullbright~~

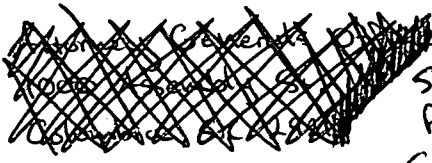
Matthew B. Fullbright, SCDC #349468

Lieber Corr. Inst., Dorm: Ashley-B-49

P.O. Box 205

Ridgeville, SC 29472

Date: 15 August 2013



Clerk of Court
S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

15 August 2013

Appellate Case No. 2012-207553

Re: Reconstruction Hearing, Stay or Abeyance of Direct Appeal

Enclosed please find a copy of the letter to Appellate Attorney, Susan Hackett, Esq. regarding my request for a reconstruction hearing and stay/abeyance of my Direct Appeal until this matter is resolved.

By this letter today I am requesting a Reconstruction Hearing in the above referenced case and that my Direct Appeal be stayed or held in abeyance until this matter is resolved and remedied.

Ms. Hackett is in the possession of the three affidavits mentioned in my letter to her.

A certificate of service is attached to this letter.

Respectfully Submitted,

Matthew B. Fullbright

Matthew B. Fullbright, SCDC # 349468
Lieber Corr. Inst., Dorm: Ashley-B-49
P.O. Box 205
Ridgeville, S.C. 29472

cc: Hon. Rosalyn Frierson

- Hon. Daniel E. Shearouse;
- Hon. Jenny A. Kitchings;
- Alan Wilson, S.C. Attorney General;
- Solicitor's Office for the 10th Judicial Circuit;
- Clerk of Court, S.C. Court of Appeals;
- Marshall Fullbright;
- Wanda Shearer;
- File.

Susan Hackett, Esq.
SCCID/Div. of Appellate Defense
P.O. Box 11589
Columbia, S.C. 29211-1589

15 August 2013

Re: 2012-207553 and Case File No. 12-068, State v. Matthew Fullbright
Request For a Reconstruction Hearing of my Jackson v. Denno Hearing
and Request to stay or hold in abeyance until reconstruction hearing
held

Dear Ms. Hackett:

I am writing to inform you concerning the non-transcribed portion of my Jackson v. Denno Hearing (my testimony), from 17 November 2011. Apparently my testimony at that hearing has been lost or destroyed through inadvertence and/or neglect.

You have already advised me that you are not going to pursue this matter. I am informed and believe that the Jackson v. Denno, was not only a critical stage of my trial proceeding, but to go forward at this time with the Record of Appeal as is, would deny me the right to effectively appeal.

While there is a transcript of a Jackson v. Denno Hearing included in the DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL (3) which is attached to your INITIAL BRIEF OF APPELLANT from 16 July 2013, it is incomplete and inaccurate — for I did testify at that hearing. I am informed and believe that my testimony was omitted, possibly due to the contents of said testimony, or possibly of accident.

Attached to this letter are three SWORN and NOTARIZED affidavits of three witnesses that were present at the 17 November 2013 Jackson v. Denno Hearing personally have heard and seen I gave testimony. I have additional affidavits shortly to follow.

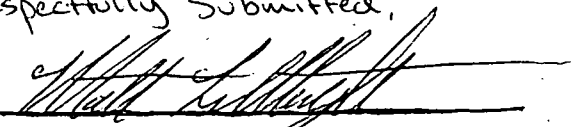
I am informed and believe that I am entitled to have a reconstruction hearing concerning this matter, as my conviction and sentences are based on a partial, incomplete, and inaccurate Record of Appeal. To go forth with such would be shocking to the universal sense of justice.

I request that a hearing to reconstruct the vital non-transcribed portion of my Jackson v. Denno Hearing (my testimony) and the stay or abeyance of my Direct Appeal occur until this matter is heard, or, in the alternative, reverse and remand my convictions and sentences for a new trial.

Future affidavits from witnesses and court spectators are forthcoming.

I have attached a certificate of service to this letter.

Respectfully Submitted,

S/ 

Matthew B. Fullbright, SCDC # 349468

Lieber Corr. Inst., Dorm: Ashley - B-49

P.O. Box 205

Ridgeville, S.C. 29472

CC:

Hon. Daniel E. Shearouse;

Hon. Jenny A. Kitchings;

Alan Wilson, S.C. Attorney General;

Solicitor's Office for the 10th Judicial Circuit;

Clerk of Court, S.C. Court of Appeals;

Marshall Fullbright;

Wanda Shearer;

File.

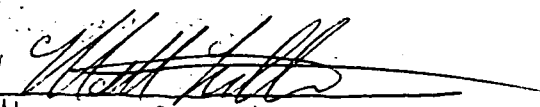
In The State of South Carolina
 CERTIFICATE OF SERVICE

MBF
 Aug. 2013
 MBF

I, the undersigned, certify that I have this date served on each of the below addresses, my Fifth written request for my discovery from Atty. Scott D. Robinson (2 pages) and a short one page letter to each of the following addresses, requesting that a response be demanded from Scott D. Robinson, as to when I may expect to receive all discovery:

Scott D. Robinson, Esq. P.O. Box 10042 Greenville, SC 29603	SC Commission on Lawyer Conduct P.O. Box 12159 Columbia, SC 29211	Marshall Fullbright 106 Dogwood Dr. Belton, SC 29627
Clerk of Court SC Supreme Court P.O. Box 11330 Columbia, SC 29211	Attorney General's Office 1000 Assembly St. Columbia, SC 29211 29211	SC Bar Assoc. 450 Taylor St. Columbia, SC 29202
SC Court of Admin. 1015 Sumter St., Suite 200 Columbia, SC 29201	Clerk of Court SC Court of Appeals P.O. Box 11629 Columbia, SC 29211	Susan Hackett, Esq. SCCID/Div. of App. Def. P.O. Box 8002 11589 Anderson, SC 29622
Anderson County Clerk of Court P.O. Box 8002 Anderson, SC 29622		Columbia, SC 29211

Date: 19 August 2013

S/ 
 Matthew B. Fullbright, SCDC #349468
 Lieber Correctional Institution, Dome: Ashley-B-49
 P.O. Box 205
 Ridgeway, SC 29472

Re: Appellate Case No. : 2012-207553

RECEIVED

AUG 22 2013

SC COURT OF APPEALS

Scott Robinson, Esq.
P.O. Box 10042
Greenville, S.C. 29603

Appellate Case No. 2012-207553

Re: Discovery, Matter of Haddock, Case No. 2010-GS-04-00069/00072

Date: 16 August 2013

Mr. Robinson:

This is the FIFTH letter from myself, personally, requesting that you send me my casefile, workfile, and all discovery in your possession, pertaining to State v. Matthew Fullbright, in which you represented me.

I have sent this letter to you certified mail. You have signed for this imploration on my behalf.

I knowingly, voluntarily, and intelligently, now waive my attorney/client privilege and confidentiality for the sole purpose of allowing and authorizing you to release and send to me my entitled casefile, workfile, and all discovery, to include but not limited to the following:

1. The entire casefile, personal notes, correspondence between yourself and all parties involved;
2. The entire workfile, including all preparatory notes for the Jackson v. Denno hearing and the trial, and notice of appeal documentation, and all worktime logs and hours worked;
3. All notes and documents pertaining to the Jackson v. Denno hearing held on 17 November 2011;
4. All notes and documents pertaining to the trial held on 23-27 January 2012;
5. All juror notes, eight total;
6. All forensic tests, forensic results, and SLED documents;
7. All Anderson County Detention Center (ACDC) medical files and documents;
8. All pathologist's reports and diagrams;
9. All autopsy reports and documents;
10. All warrants, search, arrest, etc.;
11. All indictments and applicable documents;
12. All reports, documents, files, etc., pertaining to questionable document expert Marvin Dawson;
13. All phone records;
14. All maps and applicable papers and documents;
15. All EMS reports, documents, papers, etc., pertaining to Mark Henderson, et al;
16. All evidence logs, items seized, etc.;

Page 1 of 2

Scott, you have never given me any discovery. I have not signed for anything from you, I need this, it is extremely important to my appeal, right now. Please send me everything you have pertaining to me, I am entitled to it.

17. All NCIC reports, documents, papers, etc.;
18. All call logs;
19. All statements;
20. All bank records;
21. All crime scene logs;
22. All officer's notes with applicable reports, documents, papers, etc.;
23. All booking reports;
24. All post mortem reports;
25. All incident reports with applicable reports, documents, papers, etc.;
26. All State's discovery responses;
27. All expert witness reports, documents, papers, etc.;
28. All charts, diagrams, drawings, etc.;
29. All exhibits;
30. All reports, documents, papers, etc., pertaining to your representation involving my case, hearing, trial, etc.;
31. All lead sheets;
32. Everything pertaining to your representation.

I ask this accorging to the Matter of Haddock 321 SE2d 601 SC (1984).

Your office has received no less than ten requests for my casefile, workfile and discovery from my family and myself. We are informed each time that you are busy and will return the call but you never have.

A copy of this request is being sent to the SC Commission on Lawyer Conduct, The SC bar, my appellate attorney, the Anderson County Clerk of Court, as well as my family and file. Fortunately, I keep excellent records, and as such, every single paper that was in my discovery (which was kept by ACDC upon my transfer to SCDC, and has since disappeared), was recorded.

Please include a checklist along with your reply to ensure that all discovery is included.

/s/ 

Matthew B. Fullbright, SCDC#349468
Lieber Corr. Inst., Dorm: Ashley-B-49
P.O. Box 205
Ridgeville, SC 29472

cc: SC Commission on Lawyer Conduct;
SC Bar Association;
Susan Hackett, Esq., Appellate Counsel;
Clerk of Court, Anderson County;
The Fullbright Family.

S.C. Court of Appeals, Clerk of Court
Daniel E. Shearouse, S.C. Court

Page 2 of 2

Re: Appellate Case No. : 2012-207553
Dear Appropriate Person:


Please contact Scott D. Robinson and get an answer as to why he will not answer/return my family's repeated letters and phone calls in regards to my request of my discovery from him. This discovery is vital to my Direct Appeal right now and also to any further necessary appeal. I am writing to each place on the attached certificate as a collective whole. You are each reading this same plea for help in this regard. A verbal or written reprimand to Scott D. Robinson will not get me the things in my discovery for my two life sentences and the two thirty year sentences all running concurrent.

I am informed and believe this matter should go beyond a simple investigation and requires some intervention before any more time passes and damages are sustained to my appeal which may be irreparable.

I requested via letter to Scott D. Robinson, this same discovery, sending copies of to each of you on 11 July 2013 and another a week and a half prior to this. It has been well over 30 days. Let's resolve this issue.

I request for you all to hold Scott D. Robinson accountable and force him to answer this matter. I also request that you clock stamp each of these pages: 2 pages addressed to Mr. Robinson requesting discovery, this one page collective request, and the certificate of service and send them back with your reply.

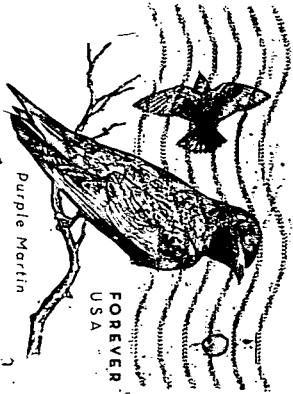
Respectfully and Gratefully Requested and Submitted,

S/ 
Matthew B. Fullbright, SCDC #349468
Lieber Corr. Inst., Dorm: Ashley-B-49
P.O. Box 205
Ridgerville, SC 29472

Date: 16 August 2013

Matthew Ellbright, SCDC # 349468
Lieber Correctional Institution, Down: Ashley - B-40
P.O. Box 205
Ridgeville, SC 29472

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Purple Martin

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AUG 19 2013

JM

LIEBER C.I.

Clerk of Court
S.C. Court of Appeals

P.O. Box 11629

Columbia, SC 29211

RECEIVED

AUG 22 2013

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29211+1529

SC Court of Appeals
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