

**From:** [Melody Brown](#)  
**To:** [Keesley, William P.](#); [Hannah Freedman \(hannah@justice360sc.org\)](#); [Charles Grose; constance.holloway@ddsn.sc.gov](#)  
**Cc:** [Howard, Patricia](#); [Shealy, Brenda](#); [Keesley, William P. Law Clerk \(Rebecca Kennedy\)](#)  
**Subject:** RE: Stone, Bobby  
**Date:** Friday, March 17, 2023 5:41:29 PM  
**Attachments:** [image001.png](#)  
(ECF #147) Joint Status Report - Bobby Stone - March 9, 2023 (03238004xD2C78).PDF

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

Dear Judge Keesley:

On behalf of Respondent, I can report that we have earlier this month served specific discovery requests on Applicant which may determine whether a deposition is necessary for one witness, Ms. Leonard; and, have consulted on the expert issue; however, we have not yet received a report from the Applicant's expert, Dr. Boyd. A deposition of their expert should not be scheduled until the report is received and we have the opportunity to review the opinion and basis for the opinion.

The federal stay is still in place and we are giving periodic updates to the District Court. The last filed status report for the federal action is attached. The next District Court status report is due May 8, 2023.

If you require anything further from Respondent at this time, please do not hesitate to contact me.

Kind regards,  
Melody

**MELODY J. BROWN, Senior Assistant Deputy Attorney General**

Office of the South Carolina Attorney General

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**From:** Keesley, William P. <WKeesleyj@sccourts.org>

**Sent:** Friday, March 17, 2023 4:03 PM

**To:** Melody Brown <MBrown@scag.gov>; Hannah Freedman (hannah@justice360sc.org) <hannah@justice360sc.org>; Charles Grose <charles@groselawfirm.com>; constance.holloway@ddsn.sc.gov

**Cc:** Howard, Patricia <phoward@sccourts.org>; Shealy, Brenda <BShealy@sccourts.org>; Keesley, William P. Law Clerk (Rebecca Kennedy) <wkeesleylc@sccourts.org>

**Subject:** RE: Stone, Bobby

When we last met in January, there was a discussion about whether the State was going to pursue obtaining an expert witness in light of the findings of intellectual disability. Would the attorneys please update me on where we are in the process so that we can try to schedule a hearing? Thank you. [wpk]

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**From:** Keesley, William P.

**Sent:** Friday, January 13, 2023 11:42 AM

**To:** Howard, Patricia <[phoward@sccourts.org](mailto:phoward@sccourts.org)>; Shealy, Brenda <[BShealy@sccourts.org](mailto:BShealy@sccourts.org)>; Supreme Court Filings <[suptctfilings@sccourts.org](mailto:suptctfilings@sccourts.org)>

**Cc:** 'Melody Brown' <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Charles Grose ([charles@groselawfirm.com](mailto:charles@groselawfirm.com)) <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; 'Hannah Freedman ([hannah@justice360sc.org](mailto:hannah@justice360sc.org))' <[hannah@justice360sc.org](mailto:hannah@justice360sc.org)>; 'constance.holloway@ddsn.sc.gov' <[constance.holloway@ddsn.sc.gov](mailto:constance.holloway@ddsn.sc.gov)>; Keesley, William P. Law Clerk (Rebecca Kennedy) <[wkeesleylc@sccourts.org](mailto:wkeesleylc@sccourts.org)>

**Subject:** RE: Stone, Bobby

Attached is an update on Bobby Wayne Stone v. State 2018CP4301025. Thank you.

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**From:** Keesley, William P.

**Sent:** Thursday, November 3, 2022 11:02 AM

**To:** Howard, Patricia <[phoward@sccourts.org](mailto:phoward@sccourts.org)>; Shealy, Brenda <[BShealy@sccourts.org](mailto:BShealy@sccourts.org)>

**Cc:** 'Melody Brown' <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Charles Grose ([charles@groselawfirm.com](mailto:charles@groselawfirm.com)) <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; 'Hannah Freedman ([hannah@justice360sc.org](mailto:hannah@justice360sc.org))' <[hannah@justice360sc.org](mailto:hannah@justice360sc.org)>; 'constance.holloway@ddsn.sc.gov' <[constance.holloway@ddsn.sc.gov](mailto:constance.holloway@ddsn.sc.gov)>; Keesley, William P. Law Clerk (Rebecca Kennedy) <[wkeesleylc@sccourts.org](mailto:wkeesleylc@sccourts.org)>

**Subject:** RE: Stone, Bobby

Attached is a scanned copy of the status update on Bobby Wayne Stone's case. By copy of this email, I am instructing the attorneys get with my law clerk about setting up a status conference by Webex at the first opportunity. The original is being mailed to the Supreme Court.

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**From:** Keesley, William P.

**Sent:** Wednesday, February 3, 2021 3:55 PM

**To:** Shearouse, Daniel <[DShearouse@sccourts.org](mailto:DShearouse@sccourts.org)>

**Cc:** 'Melody Brown' <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Charles Grose ([charles@groselawfirm.com](mailto:charles@groselawfirm.com))

<[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; 'Hannah Freedman ([hannah@justice360sc.org](mailto:hannah@justice360sc.org))'  
<[hannah@justice360sc.org](mailto:hannah@justice360sc.org)>; [constance.holloway@ddsn.sc.gov](mailto:constance.holloway@ddsn.sc.gov); Keesley, William P. Law Clerk  
(Benjamin Nicholson) <[wkeesleylc@sccourts.org](mailto:wkeesleylc@sccourts.org)>

**Subject:** Stone, Bobby

Attached is the fifth 120-day update, as directed by the Chief Justice. The original of the report is being mailed to you. Thank you. [wpk]

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