

September 3, 2024

South Carolina Court of Appeal
Post Office Box 11629
Columbia, SC 29211

RE: Quasean Marshall v. State of South Carolina
Case No: 2023-CP-23-2605
Appellate Case No: 2024-001108

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SEP 06 2024
SC Court of Appeals

To Whom it May Concern;

I hope you are well. Please find enclosed for filing a response to Respondent's response in opposition to Applicant's motion to order the production of the audio by subpoena duces tecum, a copy, and a proof of service.


Can you file this with the Honorable Court and return me a clock stamp copy. Thank you for your time concerning this matter. I look forward to your reply. Have a great day.

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SEP 09 2024

S.C. SUPREME COURT

Sincerely


Quasean Marshall 371676
Lee Correctional Inst.
990 W. Sackey Hwy.
Bishopville, SC 29010

State of South Carolina
County of Greenville

Quasean Marshall #371676

Applicant,

v.

State of South Carolina,
Respondent.

IN The Court of Common Pleas

Thirteenth Judicial

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Case No: 2023-CP-23-2605
Appellate Case No: 2024-001108

SEP 06 2024

in opposition to Respondent's Appeals
SC Court of Appeals

Applicant's Response to Respondent's

Response in opposition to Applicant's

Motion to order the production of

the Audio By Subpoena Duces Tecum

Respondent submits their Response in opposition to Applicant's Motion to Order the Production of the Audio By Subpoena Duces Tecum and states Applicant has shown no cause as to why this motion should be granted, as a final order has been issued dismissing the action, and that Applicant only states that the transcript is fraudulent and demands the Audio of his evidentiary hearing.

Applicant submitted a sworn Declaration in support of the Motion under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that is material evidence and facts.

Applicant also states that the inspection of the Audio in open court would determine the facts, evidence of Misconduct, Fraud, Conspiracy (see 18 U.S.C.A. § 371) and determine if I was deprived of civil liberties guaranteed within the U.S. Constitution such as due process and equal protections of the law, and the Audio and entire Transcript is not obtainable from some other source.

I need the Audio for my health concerns also, because the Court Reporter, Lora McDaniel, June 28, 2024 letter she advises me proceedings do not go forward unless

the petitioner and his Counsel is present, and told me my Full name and SCDC Number apparently wasn't asked for, and I know it was I would like to know if I am Delusional or not.

Respondent says Applicant has provided no good cause for the Court to grant this motion; it must be denied. However, the Attorney General is the Chief law officer of the State and responsible for advising the government on legal matters.

This is a legal matter and the information in the Audio will also determine if a miscarriage of justice, mistake, or conspiracy occurred in bad faith or with wrongful intentions. The Audio is Giglio Material and relevant evidence.

Respondent also quotes part of SC Code Ann. §17-27-150 "A party in a non capital PCR proceeding shall be entitled to invoke the processes of discovery available under the South Carolina Rules of Civil Procedure if, and to the extent that, the Judge in the exercise of his discretion and for good cause shown grants leave to do so, but not otherwise."

The other part of SC Code Ann. §17-27-150 says "If necessary for the effective utilization of discovery procedures counsel may be appointed by the Judge for an applicant who qualifies for appointment pursuant to section 17-27-60 or similar applicable provisions of law. I requested and filed a motion to be appointed counsel, but did not receive a response.

I ask that this court order Lora McDaniel, Court Reporter, to produce the Audio from March 6, 2023 hearing. Thank you.

Respectfully Submitted
Dussean Marshall #371676
8/27/24
Lee Correctional Inst.
990 Wizacky Hwy.
Bishopville, SC 29010

The State of South Carolina
In the Court of Common Pleas
Thirteenth Judicial Circuit

Case No: 2023-CP-23-2605
Appellate Case No: 2024-0108

Quasean Marshall #371676
v. Applicant,

State of South Carolina
Respondent.

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SC Court of Appeals

Proof of Service


I Certify that I have served a Response to Respondent's Response in opposition to Applicant's Motion to order the Production of the Audio by subpoena Duces Tecum by depositing a copy of it in the United States Mail, Postage Prepaid on September 3, 2024, Addressed to:

- 1) Greenville County Clerk of Court Brice Garrett
305 East North Street, Greenville SC 29601
- 2) Melody J. Brown Senior Assistant Deputy Attorney General
Post Office Box 11549, Columbia SC 29211
- 3) South Carolina Court of Appeal
Post Office Box 11629, Columbia SC 29211

Pursuant to 26 U.S.C.A. § 1746 "I declare under penalty of Perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this day of

Subscribed to and subscribed before me
this — day of — 2024

Notary Public For South Carolina
My Commission Expires: —

Respectfully Submitted
Quasean Marshall #371676

Lee Correctional Inst.
990 Wadley Hwy.
Bishopville, SC 29010

September 3, 2021

Brice Garrett
Greenville County Clerk of Court
305 East North Street.
Greenville, SC 29601

Re: Quasean Marshall v. State of South Carolina
Case No: 2023-CF-23-2605
Appellate Case no: 2024-001108

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SEP 06 2024


SC Court of Appeals

Dear Mr. Garrett;

Hi, Hope your well. Please find enclosed for filing
A response to Respondents Response in opposition to Applicants
Motion to Order the production of the Audio By Subpoena
Duces Tecum., A Copy, And A proof of service.

Can you file this with the Honorable Court
and return me a clock stamp copy. Thank you for your
time concerning this matter. I look forward to your
reply have a great day.

Sincerely


Quasean Marshall 371674
Lee Correctional Inst.
990 Wilsacky Hwy.
Bishopville, SC 29010

September 3, 2024

Melody J. Brown
Senior Assistant Deputy Attorney General
Post Office Box ~~11549~~ 11549
Columbia, SC 29211

RE: Quasean Marshall v. State of South Carolina
Case No: 2023-CP-23-2605
Appellate Case No: 2024-001108

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SEP 06 2024

SC Court of Appeals

Dear Ms. Brown;

Hi, Hope your well. Please find enclosed ~~630~~
A response to Respondents Response in opposition to Applicants
Motion to order the production of the Audio By subpoena
Duces Tecum, A Copy, and a proof of service

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Sincerely



Quasean Marshall 371676
Lee Correctional Inst.
990 Wisacky Hwy.
Bishopville, SC 29010