STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Charleston County
The Honorable Deadra L. Jefferson, Circuit Court Judge
Appellant Case No. 2017-001468

THE STATE, RESPONDENT

v.

MARVIN DONTE BRYAN, APPELLANT

FINAL BRIEF OF RESPONDENT

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ATTORNEYS FOR RESPONDENT

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1. Whether the trial court erred in ruling Appellant could not impeach Daquan Gilliard with a 2014 conviction for possession with intent to distribute cocaine, where the court ruled the conviction was not a crime of dishonesty and was thus inadmissible pursuant to Rule 609(a)(2), SCRE, since admissibility was instead controlled by Rule 609(a)(1), SCRE, because the crime was punishable in excess of one year?

2. Whether the trial court erred in ruling Appellant could not cross-examine Daquan Gilliard regarding his prior conviction for possession with intent to distribute cocaine, since Appellant was entitled to considerable latitude in cross-examining his accuser?

3. Whether the trial court erred in ruling Appellant was not permitted to cross-examine Daquan Gilliard about a pending charge, since generally, anything having a legitimate tendency to throw light on the accuracy, truthfulness, and sincerity of a witness may be shown and considered?

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RESPONDENT'S COUNTER-STATEMENT ON ISSUES ON APPEAL

1. Did the trial court err in ruling that the Appellant could not impeach co-defendant Daquan Gilliard for a 2014 conviction for possession with intent to distribute cocaine where the court correctly found that this cannot be considered a crime of dishonesty and mentioning this conviction would cause a prejudicial effect that overrides any probative value it may have?

2. Did the trial court err in the denial of allowing the Appellant ask Mr. Gilliard about a previous conviction for possession with intent to distribute cocaine due to the fact this is not a crime of dishonesty and the reasoning raised by the Appellant in asking about this conviction does not follow the South Carolina Rules of Evidence?

3. Did the trial court err in not allowing Appellant to question Mr. Gilliard regarding a pending charge in another jurisdiction?

4. Did the trial court err in ruling that the record was adequately reconstructed due to the fact the transcript from the original trial was available and the reconstruction included only bench conferences that did not refer to the issues raised within this appeal?

STATEMENT OF THE CASE

On November 22, 2015, four individuals Justin Wilson (Wilson), Keith Evans (Evans), Daquan Gilliard (Gilliard) and Marvin Donte Bryan (Appellant) were riding in a Ford Edge that was rented by the mother of Wilson's baby, Danielle Ravenel. (R. p. 410 l. 14-16). While riding Wilson got a call that a person who shot him months earlier was spotted at this nightclub. (R. p. 98 l. 14-19). Prior to going to the club Wilson went to his cousin's house to retrieve an assault rifle. (R. p. 99 l. 9-13). After acquiring this assault rifle all four men went to the club looking for a black Lincoln, because Wilson was told the person they were looking for was driving a Lincoln. (R. p. 99 l. 25 – p. 100 l. 4). They could not find the Lincoln, so they decided to leave the area.

While heading back they spotted a red Dodge Charger at the El Cheapo gas station. (R. p. 603 l. 22-23). In that vehicle they spotted another individual responsible for shooting Wilson back in July of that year. (R. p. 100 l. 4-9). Once he was spotted, Wilson told the others in the vehicle "That's that boy." They decided to park in the parking lot of a hotel across the street. (R. p. 124 l. 10-11). Once the red Charger pulled out they began following it. They later got to a stop light and that was when Wilson took an assault rifle and began shooting at the red Charger. (R. p. 128 l. 14-15). The red Charger sped off and the defendants got into a high-speed chase with the Charger. Wilson continued shooting until the assault rifle jammed so he asked for another gun. He was provided a .40 caliber handgun by the Appellant. (R. p. 129 l. 4-14; p. 130 l. 6-12). Wilson used this gun and continued to shoot at the red Charger. (R. p. 130 l. 14-15). They continued this chase until they got to Park Circle. They made a sharp turn too fast and crashed into a ballpark. (R. p. 131 l. 18-20). The red Charger also crashed. They all got out of the Ford and ran. (R. p. 132 l. 14).

Law enforcement and emergency medical services were called. Michelle Reid of Emergency medical services (EMS) responded to the scene. She initially checked on Mr. Franklin

Williams and she immediately determined he was deceased. (R. p. 249. 15-17). Mr. Willams was suffering from multiple gunshot wounds to his neck, head, and body. (R. p. 252 l. 3-5). She then checked on an individual that was in the middle of the street who was also shot. (R. p. 249 l. 11-13) She later determined that person was Adrian Williams, and he told her he ran until he couldn't run anymore and collapsed in the street. (R. p. 250 l. 15-17). Adrian had multiple gunshot wounds to his right leg. (R. p. 250 l. 23).

After the shooting Officer Charles Martin of the North Charleston Police Department responded. He heard that three black males were running from the scene. (R. p. 256 l. 2-10). He spotted them and stopped them to do a *Terry* frisk. Officer Martin identified these males as Gilliard, the Appellant, and Evans. (R. p. 262 l. 24 – p. 263 l. 3). Since these individuals were clean, he released them.

After this incident the three individuals went to their friend Dominique Edwards' house to attempt to develop an alibi. (R. p. 625 l. 24 – 626 l. 1). The plan was for them to say that Gilliard was at a friend's house all night, and that Appellant and Evans were at a club and the Ford was stolen so they walked to Dominque's house where Wilson was all night. (R. p. 144 l. 11-25). Evans was later questioned by police and he stuck to this story for a little while, but he ultimately confessed. (R. p. 628 l. 17-25; p. 629 l. 1-2).

Appellant was indicted by the Charleston County Grand Jury for the offenses of murder and three counts of attempted murder. On June 19, 2017, Appellant appeared along with his counsel Bentley Price before the Honorable Deadra L. Jefferson for trial. Appearing representing the State of South Carolina was Assistant Solicitors, E. Culver Kidd and Charles William Patrick of the Ninth Circuit Solicitor's Office. This trial was held simultaneously along with Appellant's co-defendant Justin Wilson who appeared with his trial counsel Mark Andrew Peper.

During trial, both co-defendants Keith Evans and Daquan Gilliard testified. Prior to Mr. Gilliard's testimony, trial counsel requested that he be questioned regarding his prior 2014 conviction for possession with intent to distribute cocaine, and a pending possession with intent to distribute cocaine occurring in Orangeburg County. (R. p. 149 l. 14-21; p. 156 l. 2-3). The court ruled that these charges did not involve a crime of dishonesty. These crimes did not impeach a person's credibility but tended to just involve a person's character. (R. p. 152 l. 7-12). The trial court denied the Appellant's request to raise the conviction and pending charges during cross-examination.

During trial, Officer Buskick of the North Charleston police department testified. He stated that when he got to the scene of the accident, he started looking for weapons. (R. p. 296 l. 5-6). Officer Buskick testified that he located a TABCO rifle and a Smith & Wesson .40 caliber handgun. (R. p. 296 l. 21-23). He later found a glock handgun. (T. p. 297 l. 1). Officer Tiffany Adams of the North Charleston Police Department also responded to the scene. She was the crime scene investigator (R. p. 341 l. 14). Officer Adams testified that she collected a McDonald's cup and straw in the cup holder in the Ford. (R. p. 353 l. 17-18).

Agent Catherine Leisy of the South Carolina Law Enforcement Division (SLED) also testified. Agent Leisy was admitted as an expert in forensic identification testing. (R. p. 516 l. 14-20). Agent Leisy testified that she was given the straw to analyze for DNA. (R. p. 529 l. 17-19). The DNA from this straw matched the Appellant, the probability of randomly selecting an unrelated individual is 1 in 11 septillion. (R. p. 529 l. 24 – p. 530 l. 3).

Dr. Cynthia Schandi, a forensic pathologist, also testified. Dr. Schandi was admitted as an expert in the field of forensic pathology. (R. p. 319 l. 5-7; 11-12). Dr. Schandi performed the autopsy on Franklin Williams. (R. p. 319 l. 15-17). Dr. Schandi testified that Mr. Williams was

shot in the right elbow, the bullet went upwards into his arm and caused fractures. (R. p. 320 l. 18-20; l. 24-25). However, Dr. Schandi testified that Mr. Williams' death was caused by a bullet that entered the right side of his neck breaking apart his carotid artery. (R. p. 322 l. 4-6). Dr. Schandi also discovered that another bullet went into the middle of his body and was recovered in his arm, (R. p. 322 l. 16-17; l. 21), and she discovered another round hit him in the shoulder. (R. p. 323 l. 5-6).

After 5 days of testimony a jury of his peers found the Appellant guilty of murder and three counts of attempted murder. (R. p. 1006 l. 16-20; p. 1006 l. 25; p. 1007 l. 3; p. 1007 l. 15-19; p. 1008 l. 7-10). After the reading of the verdict Appellant appeared before the trial court for sentencing. Appellant was sentenced to a fifty (50) year period of incarceration for murder (R. p. 1048 l. 2-5); and thirty (30) years each for attempted murder (R. 1048 l. 7-9).

ARGUMENTS

1. **Trial court did not err in ruling that Appellant could not impeach co-defendant Daquan Gilliard with his 2014 conviction for possession with intent to distribute cocaine, where the court correctly found this cannot be considered a crime of dishonesty and the prejudicial effect would override any probative value this impeachment may have.**

Relevant Facts

During trial co-defendant Daquan Gilliard testified. Prior to cross-examination Appellant's trial counsel wished to ask him questions regarding a 2013 arrest and 2014 conviction for the offense of possession with intent to distribute cocaine. The trial court stated that the Supreme Court determined that a drug offense is not probative for truthfulness. (R. p. 150 l. 13-14). Appellant's trial counsel was willing not to raise the offense but to say that he was arrested and convicted. (R. p. 150, 15-18) The trial court responded that an arrest is not probative for truthfulness. (R. p. 150

l. 19). The trial court decided not to allow the Appellant to get into the prior drug conviction of Mr. Gilliard since it is not a crime of dishonesty.

Standard of Review

In criminal cases, the appellate court sits to review errors of law only. *State v. Wilson,* 345 S.C. 1, 5, 545 S.E.2d 827, 829 (2001). The materiality, relevance, and admissibility of evidence are within the sound discretion of the trial court and will not be disturbed on appeal absent an abuse of discretion. *State v. Rosemond,* 335 S.C. 593, 596, 518 S.E.2d 588, 589 (1999). An abuse of discretion occurs when the conclusions of the trial court lack evidentiary support or are controlled by an error of law. *State v. Anderson,* 386 S.C. 120, 126, 687 S.E.2d 35, 38 (2009). A trial judge's decision regarding the comparative probative value and prejudicial effect of evidence should be reversed only in exceptional circumstances. *State v. Collins,* 409 S.C. 524, 763 S.E.2d 22, 28 (2014). The scope of cross-examination is within the discretion of the trial court, whose decision will not be reversed on appeal absent a showing of prejudice. *State v. Colf,* 337 S.C. 622, 624, 525 S.E.2d 246, 248 (2000).

Discussion

The Appellant argues that the trial court erred in deciding that Appellant could not ask Mr. Gilliard about his possession with the intent to distribute cocaine conviction back in 2014. The Rule that governs the impeachment by a conviction of a crime is Rule 609 of the South Carolina Rules of Evidence which states:

> For the purpose of attacking the credibility of a witness,
> (1) evidence that a witness other than the accused has been convicted of a crime shall be admitted, subject to Rule 403, if the crime was punishable by death or imprisonment in excess of one year under the law under which the witness was convicted, and evidence that an accused has been convicted of such crime shall be admitted if the court determines that the probative value of admitting this evidence outweighs its prejudicial effect to the accused; and

(2) evidence that any witness has been convicted of a crime shall be admitted if it involved dishonesty or false statement, regardless of the punishment.

Rule 609(a)(1-2), SCRE.

Prior to making a decision of whether a person should be asked about his prior record the rules require that the trial court make a Rule 403 analysis and make a determination of whether the inclusion of the witnesses' prior conviction's probative value exceeds any prejudicial effect. Rule 609 requires the trial court articulate specific facts and circumstances supporting its determination that the probative value of the evidence substantially outweighs its prejudicial effect. *Colf,* 337 S.C. at 626, 525 S.E.2d at 248.

In *State v. Colf,* the South Carolina Supreme Court stated that the court apply five factors that are used in Federal Court to make this determination. These five factors are: (1) The impeachment value of the prior crime; (2) The point in time of the conviction and the witness's subsequent history; (3) The similarity between the past crime and the charged crime; (4) The importance of the defendant's testimony; and (5) The centrality of the credibility issue. *Id.,* 337 S.C. at 627. However, the Supreme Court did not make these criteria mandatory. In *Colf* the court also determined, "these factors are not exclusive; trial courts should exercise their discretion in light of the facts and circumstances of each particular case. *Id.*

In the final determination the trial court stated:

> "Yeah I can't find anything that would support you being able – the whole purpose of using a prior crime to impeach somebody's credibility is it involved false statement or dishonesty. A crime in and of itself does not impeach a person's credibility. It more tends to involve their character. In other words, saying because they were convicted of something that they are a bad person and you shouldn't believe them. The only exception to that rule is 609(b) which deals with crimes of dishonesty or involving moral turpitude. Because then that implicates the person's veracity."
>
> "Now if they impersonated a police officer, of course, that involved dishonesty. Shoplifting is dishonesty as long as it was a theft. Burglary is dishonesty as long as

> it involved a theft. And even if it involved all those things, I would still would have to engage in the balancing test that it's more probative than prejudicial, which means – and of course in this case I think it would meet that standard because credibility is an issue. But I think when you start talking about drug offenses, it's more of a character issue than a truthfulness issue. Because you're saying by virtue of the fact that they've been convicted of a drug offense, they shouldn't be believed because they're dishonest."

(T. p. 152 l. 7-17; p. 153 l. 11-23).

The trial court was correct in applying the balancing test regarding mentioning if a person's conviction for drug offenses reveals any evidence that is more probative than prejudicial. The prejudice that this would involve certainly overrides any probative value due to the fact the Supreme Court has already decided that drug offenses are not crimes of dishonesty. A conviction for robbery, burglary, theft or drug possession beyond the basic crime itself is not probative of truthfulness. *State v. Bryant,* 369 S.C. 511, 517, 633 S.E.2d 152, 155 (2006), *also see, State v. Robinson,* 426 S.C. 579, 596, 828 S.E.2d 203, 211 (2019).

The reasoning by the trial court was proper. The Appellant cannot bring up prior convictions of drug offenses in order to impeach the witness when the Supreme Court has determined that a drug offense is not a question of moral turpitude. The trial court was absolutely correct when it reasoned that if this was presented then, they would be telling the jury that he is not being truthful, not because he had committed a past crime regarding something dishonest, but he cannot be trusted because he committed a crime four years earlier when he has already served his punishment. (R. 150 4-6). The prejudicial effect clearly outweighs any probative value that could come from mentioning this prior offense. The trial court applied a Rule 403 analysis as prescribed by the Rules of Evidence and made a lawful decision in not allowing this to be raised in cross-examination. This decision by the trial court should be upheld.

2. **The trial court did not violate Appellant's right to confrontation by not allowing the Appellant to ask Mr. Gilliard about a previous conviction for possession with intent to distribute cocaine, this is not a crime of dishonesty and the reasoning for the Appellant asking about this conviction goes against the South Carolina Rules of Evidence.**

Relevant Facts

During trial the Appellant argued that he should be able to question Mr. Gilliard on his past conviction in order to reveal to the jury that he is no stranger to the courtroom. The Appellant argues that he should be given latitude in the cross-examination of the witness.

Standard of Review

The admission of evidence concerning past convictions for impeachment purposes remains within the trial court's discretion, provided the trial court conducts the analysis mandated by the evidence rules and case law. *State v. Dunlap,* 346 S.C. 312, 324, 550 S.E.2d 889, 896 (Ct. App. 2001). The starting point in the analysis is the degree to which the prior conviction had probative value, meaning the tendency to prove the issue at hand, the witnesses' propensity for truthfulness or credibility. *State v. Black,* 400 S.C. 10, 21, 732 S.E.2d 880, 886 (2012). The scope of cross-examination is within the discretion of the trial judge, whose decision will not be reversed on appeal absent a showing of prejudice. *State v. Sherard,* 303 S.C. 172, 399 S.E.2d 595 (1991).

Discussion

The Appellant argues that he should have been given latitude in the cross-examination of Mr. Gilliard. The Appellant feels that he should have been allowed to ask questions regarding the past conviction of Mr. Gilliard in order to reveal that Mr. Gilliard was no stranger to the courtroom. The mentioning of a person's prior record, while he is a witness in a case, is not for the purpose of revealing that they have been in a courtroom before, it is for the purpose of attacking a witness's credibility. Rule 609 clearly states, "For the purpose of attacking the credibility of a witness." Rule

609, SCRE. The Appellant has no right to ask a person about their prior criminal history in order to reveal they have been in a courtroom before. The fact that a witness has been in a courtroom before is not relevant and a witness should not allowed to be asked about a prior conviction for only that purpose. The Appellant should only be given some leeway in cross-examination if it abides to the rules of court. This certainly does not. Rule 609 was not created for the purpose of making the jury realize that a witness had been in a courtroom before. It is for the purpose of attacking a person's credibility. As stated earlier, the Supreme Court has already ruled that being convicted of a drug offense is not probative of truthfulness, so mention of a prior conviction for a drug offense is not allowed under Rule 609. The denial of this type of questioning by the trial court was proper and should be upheld by this Court.

2. Trial court did not err in not allowing Appellant to question Mr. Gillard regarding a pending charge due to the fact asking a question regarding a charge that is still pending raises questions about character which is not allowed under the rules of evidence.

Relevant Facts

The Appellant wished to question Mr. Gilliard on a pending firearms charge in Orangeburg County, even though this trial was held in Charleston County, so this Solicitor's office had no input on that pending charge. The trial court decided that unless they could show there was some deal between the Solicitor's offices in Charleston and Orangeburg, this was not relevant. (R. p. 156 l. 16-19).

Standard of Review

The cross-examination of a witness to test his credibility is largely within the discretion of the trial judge, and his discretion whether to allow the contradictory testimony will not be disturbed on appeal except for a manifest abuse of discretion. *State v. Lynn,* 277 S.C. 222, 284 S.E.2d 786 (1981). Counsel should not be permitted an irrelevant or speculative search in hopes of finding

some misconduct involving moral turpitude by a witness. *State v. McGuire,* 272 S.C. 547, 550, 253 S.E.2d 103, 104 (1979).

Discussion

The mere fact that a witness has potential criminal exposure does not automatically result in the potential charge being admitted as evidence. *The New Wigmore. A Treatise on Evidence: Impeachment and Rehabilitation.* §6.3.9 (1st ed. 2023). According to the Rules of Evidence the only way a person can ask about pending or prior charges is to reveal untruthfulness. The Appellant in this case wished to ask Mr. Gilliard about pending charges in another jurisdiction in order to reveal that he was seeking favor from the solicitor's office. However, he failed to reveal how this testimony would garner him any favor in another jurisdiction. Charleston County is in the Ninth Judicial Circuit, Orangeburg is in the First. These are two totally different offices which cannot force each other to give leniency on a pending charge. The only reason that the Appellant wished to asked about pending charges is to bring Mr. Gilliard's character into issue, which is not allowed unless the State opens the door to such questioning. There is no evidence in the record that this occurred.

Within his brief Appellant argues this denial regarding going into his pending charges violates the Confrontation Clause. Trial judges retain wide latitude insofar as the Confrontation Clause is concerned; they can impose reasonable limits on such cross-examination based on concerns about, among other things: harassment, prejudice, confusion of the issues, witness safety, or interrogation that is repetitive or only marginally relevant. *Delaware v. VanArsdall,* 475 U.S. 673, 677, 106 S.E.2d 1431, 1435 (1986). The fact Mr. Gilliard had pending charges in another county is not relevant to the present case. The trial court was correct in not allowing evidence of pending charges. Unless the Appellant can reveal any possible bias or motive by the witness, the

pending charges are not admissible. The only way they would be able to ask that question is if they can reveal some type of bias under Rule 608(c).[1] The trial court was correct, in order to get into a pending charge the Appellant would have had to reveal some kind of favor Mr. Gilliard was receiving from the First Circuit for this testimony. There is no evidence that any favors were given to Mr. Gilliard by the First Circuit Solicitor's office. Therefore, this information was not relevant and not admissible. The trial court made the correct decision in not allowing Mr. Gilliard's pending charges into evidence.

3. The trial court did not err in ruling that the record was adequately reconstructed due to the fact the transcript from the original trial was still available and the reconstruction only included bench conferences none of which had anything to do with the issues raised within this appeal.

Relevant Facts

On August 22, 2018, Appellant filed a motion to reconstruct the record of the bench conferences during the original trial. This motion was made due to the fact all arguments during trial were via bench conferences, and there was no record of these conversations. On November 8, 2018, this Court granted the motion and ordered Appellant to contact the Respondent and trial judge in order to schedule a hearing to reconstruct the record.

The record was reconstructed revealing the conversations that were held during the bench conferences. Appellant now argues that the trial court erred in ruling that the record on the bench conferences was adequately reconstructed.

[1] Bias, prejudice or any motive to misrepresent may be shown to impeach the witness either by examination of the witness or by evidence otherwise adduced. Rule 608(c), SCRE.

Standard of Review

A new trial is therefore appropriate if the appellant establishes that "the incomplete nature of the transcript prevents the appellate court from conducting a 'meaningful appellate review.'" *State v. Ladson,* 373 S.C. 320, 325, 644 S.E.2d 271, 274 (2007), *quoting, In re D.W.,* 171 N.C. App., 496, 615 S.E.2d 90, 94 (2005).

Discussion

The Appellant alleges that there is not a complete record on appeal in order for this court to make an informed decision regarding the issues that have been brought up on appeal. This is due to the record of the bench conferences that was recreated. The Respondent argues that the record is complete. There is enough within the record for this Court to be able to make a meaningful review.

There is a complete seven hundred eleven (711) page transcript of the entire trial within the record. There is also an additional three hundred forty (340) page transcript of witness testimony and a thirty-seven (37) page reconstructed transcript of the bench conferences. Each issue that was brought up in appeal has been addressed and ruled upon by the trial court. The bench conferences had nothing to do with any of these issues so the recreation was irrelevant.

The argument raised by the Appellant does not warrant reversal due to the fact the complete transcript is available for this Court to make an informed decision. Even if the entire record was not available that does not warrant an automatic reversal. The inability to prepare a complete verbatim transcript, in and of itself does not necessarily present a sufficient ground for reversal. *Id.,* 373 S.C. at 324, 644 S.E.2d at 273, *quoting, Smith v. State,* 291 Md. 125, 433 A.2d 1143, 1148 (1981).

Appellant also argues that there is potential for future collateral challenges, for example in post-conviction relief. The trial transcript by itself reveals sufficient information to determine whether or not trial counsel was ineffective. It reveals each argument and cross-examination made by trial counsel. Respondent argues that at this time Appellant does not have standing to make such an argument due to the fact this is an appeal regarding the initial trial and not a post-conviction relief hearing. Standing refers to a party's right to make a legal claim or seek judicial enforcement of a duty or right. *South Carolina Department of Social Services v. Boulware,* 422 S.C. 1, 6, 809 S.E.2d 223, 225 (2018).

The record is more than adequate in order for this court to make an informed decision regarding the decisions of the trial court. This record is more than adequate, and this case does not warrant reversal.

CONCLUSION

The Respondent argues that decisions made by the trial court were lawful and should be affirmed by this Court. Respondent further argues that the record is adequate for this court to make an informed decision regarding the decisions made by the trial court.

Respectfully submitted,

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December 19, 2024

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STATE OF SOUTH CAROLINA
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Appeal from Charleston County
The Honorable Deadra L. Jefferson, Circuit Court Judge

THE STATE,

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v.

MARVIN DONTE BRYAN,

Appellant.

Appellate Case No. 2017-001468

PROOF OF SERVICE

I, Brandy Rankin, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Final Brief of Respondent and Proof of Service have been forwarded to Appellant's counsel, Joanna K. Delany, Esq., via email today, December 19, 2024 to JDelany@sccid.sc.gov, and to her assistant, Sara McInnis to SMcInnis@sccid.sc.gov.

I further certify that all parties required by Rule to be served have been served.

This is the 19th day of December 2024.

s/Brandy Rankin
Brandy Rankin
Legal Assistant

Brandy Rankin

From:	Brandy Rankin
Sent:	Thursday, December 19, 2024 8:28 AM
To:	Delany, Joanna
Cc:	Tommy Evans, Jr.; smcinnis@sccid.sc.gov
Subject:	Final Brief - The State v. Marvin Donte Bryan - Appellate Case No. 2017-4520
Attachments:	FInal Brief of Respondent MARVIN BRYAN-Approved for Filing by TE.pdf; Proof of Service to Final Brief Marvin Bryan.pdf

Dear Ms. Delany,

Please find attached the Respondent's Final Brief and Proof of Service. These documents will be filed today, December 19, 2024, with the South Carolina Court of Appeals along with a copy of this email. Thank you. Have a great day!

Sincerely,
Brandy Rankin

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