RECEIVED
Mar 03 2025
SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Charleston County

The Honorable Deadra L. Jefferson, Circuit Court Judge

THE STATE,

Respondent,

v.

ALONZA D. MARABLE,

Appellant.

Appellate Case No. 2023-000988

FINAL BRIEF OF RESPONDENT

ALAN WILSON
Attorney General

W. JEFFREY YOUNG
Chief Deputy Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

P.O. Box 11549
Columbia, South Carolina 29211
(803) 734-6305

SCARLETT A. WILSON
Solicitor, Ninth Judicial Circuit
101 Meeting St., Ste. 400
Charleston, South Carolina 29401
(843) 958-1900

ATTORNEYS FOR RESPONDENT

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases:

APPELLANT'S STATEMENT OF ISSUE ON APPEAL

Did the trial court err in refusing to grant a mistrial when the juror's questions before the conclusion of the evidence indicated they engaged in premature deliberations?

RESPONDENT'S COUNTERSTATEMENT OF ISSUE ON APPEAL

Did the trial judge abuse her discretion in declining to grant a mistrial on the basis of the jury foreperson's note requesting clarification on three factual matters when the trial judge assessed there was a potential for premature deliberations and appropriately cautioned against same, but found no evidence of premature deliberations?

STATEMENT OF THE CASE

A Charleston County grand jury indicted Appellant Alonza D. Marable, for attempted murder, ABHAN, and murder. (R. p.748-751; Supp. R. p. 1-2). Chad Shelton, Esq., represented him on the charges. A jury trial was held June 12-15, 2023, before the Honorable Deadra L. Jefferson. The jury convicted Appellant of murder and ABHAN, but acquitted on attempted murder. (R. p. 725-726). Judge Jefferson sentenced him to 30 years imprisonment for murder, and 15 years, concurrent, for ABHAN. (R. p. 745).

This direct appeal follows.

RESPONDENT'S STATEMENT OF THE FACTS

On April 18, 2020, Appellant with co-defendant Antwan Johnson joined together to exact revenge on Lanelle Reid.

Appellant picked up Antwan and drove to a Lakewood Street home in the Ferndale Mobile Home Park where sixteen-year-old Lanelle lived with his family. (R. p. 58-59; 286; 318). After determining he was not present in the home, they drove through Ferndale and around searching for him. (R. p. 146; 291-292). They would eventually find him, walking down the street toward his home with Jamaul Simmons. Appellant drove back to the Lakewood Street home and waited. Seeing the men approach, both Appellant and Antwan, each separately armed, pointed their weapons toward Lanelle and Jamaul and began a barrage of fire. Jamaul was not harmed, but another resident in the area, Martin Jimenez, was hit by a bullet that passed through his mobile home and grazed his head. Lanelle died in the front yard of his home. (R. p. 62-64; 79-80; 293-296; 413-417). The autopsy showed a "single gunshot wound to the head" that would have rendered him "incapacitated very quickly, if not immediately." (R. p. 401-402). Considering the wound and the fragment recovered, the shot was most consistent with being from a handgun. (R. p. 407).

Simmons, who survived, testified that he recalled hearing two guns being fired, but that the attackers had shirts around their faces so he could not identify them. He heard someone yell, "Give me everything." The sounds to him indicated a "big gun" or rifle, and a pistol. (R. p. 263-270). He also testified that Antwan called him earlier that same day to claim Lanelle had money that belonged to him, and Antwan wanted it back. (R. p. 271-272). Simmons testified he observed after the shooting that it looked like someone had been through Lanelle's pockets. (R. p. 274-275).

Video recovered around the scene allowed officers to identify Antwan as the person who went up to the body. (R. p. 437-438).

By happenstance, an investigator, looking for video footage that may aid in the investigation, asked for assistance at a nearby Emden Street address. As it turned out, the video provided showed Appellant's car and two individuals exiting the backseat and entering the home. The home was where co-defendant Antwan lived. (R. p. 104-116). Jessica Freeman, who lived at the Emden Street address at the time, confirmed Antwan lived at that address. She also confirmed that Antwan was dropped off at the home after she heard the gunshots in the area. Antwan was with Pierre Nelson. Appellant was driving the car. (R. p. 149-153). The police collected two assault rifles and multiple other guns from the home. (R. p. 93-94).

Pierre Nelson testified that he was a friend to Antwan. Earlier in the day, Antwan told Pierre that he had been robbed by a former friend. (R. p. 285). Pierre went to Antwan's home. A car drove up and Antwan and Pierre got in the back of the car to go to the friend's house. (R. p. 286, 290). Pierre identified Appellant as the driver. (R. p. 288-289; 316; 318). Someone he did not know was a passenger. (R. p. 290). They drove around for some time until "somebody in the car pointed out that's them boys right there," and they pulled into a driveway. (R. p. 291-293). The driver and Antwan got out and he heard shots. (R. p. 294-297). He recalled there being two guns, a "long barrel" gun in the front, and a pistol in the back. (R. p. 295-296; 301; 319). He returned to Antwan's home and got out of the car with him. (R. p. 299).

Based on information from the investigation about the car involved, Office Michael Cook initiated a stop of a dark-color Ford Focus. The car belonged to Appellant's sister. Appellant was the driver and only person in the car. (R. p. 165-168; 171-178; 423-429). A search of the car turned up two unfired bullets in the trunk. They were consistent with the rifle shells at the murder scene.

(R. p. 480-481). Officers also searched Appellant's home finding ammunition and a Ruger rifle in a bedroom that also had Appellant's identification. A paper bag containing ammunition was also found in the living area. The grip and trigger area of the rifle was tested for potential DNA. The DNA returned "very strong support" when compared with Appellant's known DNA. (R. p. 191-197; 202; 208-209; 382; 389). The ammunition collected located in the home was consistent with the shells collected at the scene. (R. p. 489-496).

Casings from both a handgun and a rifle were recovered at the scene. The rifle casings location was consistent with being near the driver's side of the car. (R. p. 438). Video also allowed officers to confirm that the driver and the individual from the back passenger side were the ones exiting the vehicle for the shooting, while two others remained in the car. (R. p. 441-442).

Prior to Appellant's trial, Antwan plead guilty to murder and assault and battery of a high and aggravated nature. (R. p. 473).

The State played a series of jail calls, (R. p. 565-569), where Appellant, as phrased by the trial judge in ruling on admissibility:

> …attempts to exculpate himself, his version of it … which is Mr. Johnson set him up. … it was him and his friends, referring to Mr. Johnson, who were trying to exact some form of revenge for a theft that purportedly took place earlier in the day and his only involvement was that he gave Mr. Johnson a ride. And he wasn't going to take responsibility for what took place as a result of it. In other words, exculpating him from any conspiracy or knowledge of any conspiracy regarding these events.
>
> However, there's also, other information that he provides, that being the attempt to contrive an alibi as well as any references to the weapon that was not found in the residence, or even those that were found in the residence and, apparently, some knowledge that the rifle they found was, in fact, his and had been removed from the residence when it appears his mother is reading the search warrant return to him.

> In addition to that it, also, divulges his knowledge of the purported facts and circumstances surrounding the event. To some extent, the things that he has said have been admissions against interest.

(R. p. 548-555).

As previously noted, having heard this evidence, the jury convicted Appellant of murder and assault and battery of a high and aggravated nature.

STANDARD OF REVIEW

"In criminal cases, the appellate court sits to review errors of law only." *State v. Wilson*, 345 S.C. 1, 5–6, 545 S.E.2d 827, 829 (2001) (citing *State v. Cutter*, 261 S.C. 140, 199 S.E.2d 61, 65 (1973)). " 'The general rule in this State is that the conduct of a criminal trial is left largely to the sound discretion of the presiding judge and this Court will not interfere unless it clearly appears that the rights of the complaining party were abused or prejudiced in some way.' " *State v. Commander*, 396 S.C. 254, 262, 721 S.E.2d 413, 417 (2011) (quoting *State v. Bridges,* 278 S.C. 447, 448, 298 S.E.2d 212, 212 (1982) (citations omitted)).

Mistrial Motions

"The granting or refusing of a motion for a mistrial lies within the sound discretion of the trial court and its ruling will not be disturbed on appeal absent an abuse of discretion amounting to an error of law." *State v. Harris*, 340 S.C. 59, 63, 530 S.E.2d 626, 627–28 (2000).

ARGUMENT

The trial court did not abuse its discretion by denying Appellant's motion for a mistrial based on a fear of potential premature deliberations when the trial judge did not find any evidence of premature deliberations by the jury foreman's request for clarification on three factual matters.

The Issue at Trial:

At the beginning of the proceedings on Thursday, June 15, 2023, the trial judge initially reviewed evidentiary issues with counsel, then, prior to the trial resuming, advised the parties that she had to address a note from the jury. (R. p. 557). As placed on the record by the trial judge, the note read:

> Number one, What weapon was associated with the projectile found in Mr. Jimenez - - I think they meant - - they have an apostrophe, so I think they meant to put an S, which would be possessive, Jimenez's trailer/head injury?
>
> The next question, number two, To be clear, was a 40 caliber pistol ever recovered, parenthesis, that was used at the scene, end of parenthesis?
>
> Three, At the Emden house, did they interview anyone else from that night to identify the driver? Signed by the Foreperson.

(R. p. 557, lines 7-18).

The trial judge suggested a response that the evidence is presented and to specifically advise, "The Court cannot answer factual questions. You must only consider the testimony and evidence that has been submitted into the record for the purposes of your deliberations." (R. p. 557, lines 21-25). The trial judge additionally proposed these cautions:

> You cannot conduct your own independent investigation or fact finding outside the evidence and testimony presented to you during the course of this trial. You're not to speculate or draw any inferences or conclusions from this response to your inquiry during your deliberations.

(R. p. 557, line 25 – 558, line 5).

Out of an abundance of caution, the trial judge indicated that she may round out the proposed instruction with yet another caution:

> And I think I may, also, add and emphasize that the note would indicate that there's the potential for premature deliberation regarding the facts and circumstances of this case and I would remind them that that is strictly prohibited.

(R. p. 558, lines 5-10).

The State noted that it had not yet rested, and the trial judge offered additional instructions about procedure and "do not decide any issue in this case until you've heard all the evidence from the lips of the sworn witnesses and other evidence that may be introduced and not have any discussion regarding this matter until all the evidence has been presented, the parties have made their closing arguments and the Court has instructed you on the law." (R. p. 558, line 24 – 559, line 10). The State agreed and requested the language be added. (R. p. 559, line 11).

The trial judge then asked the defense for any exceptions to the proposed instruction, at which time defense counsel moved for a mistrial arguing:

> I think that they're already starting deliberations. I don't feel that's proper. I don't feel them even asking questions at this point in time in the case is proper.

(R. p. 559, lines 13-18).

The trial judge disagreed with the defense assessment given that the jurors may simply think its okay to ask questions (as some states allow), and the note was only from the foreperson, not indicating other jurors had discussed the matter, but that a curative would be appropriate in any case. (R. p. 559, line 19 – 560, line 10). The defense responded:

> For purposes of the record, I don't believe that a curative instruction will alleviate this and it feels like - - it sounds like - - it comes across as them already starting deliberations, so I would respectfully, Your Honor, move for a mistrial.

(R. p. 560, lines 11-15).

The judge noted the defense objection, and in denying the motion on the record found:

> The grant or denial of a mistrial is solely within the province and discretion of the Court. Our Supreme Court has been very clear that, at least, an objectionable [sic] way to handle it would be to give a curative instruction and not to grant a mistrial. And there's no evidence in the record to indicate that they are prematurely deliberating. But even if they had, the remedy would still be a curative instruction.

(R. p. 561, lines 4-11).

The jury returned to the courtroom, and the trial judge acknowledged the note, and gave the following instruction:

> In response to that question, ladies and gentlemen, I advise you as follows: Under our rules in the State of South Carolina, juries cannot ask actual questions regarding the facts and circumstances of the case. By your oath, you are required to decide this case only according to the testimony that is presented from the lips of the sworn witnesses and the other evidence that may be introduced. Under our rules of evidence and procedure, there is a way that attorneys try a case and that is based on those rules of evidence and procedure.
>
> So I would instruct you further that you have at this point heard the evidence in this case. The Court cannot answer factual questions. You must only consider the testimony and evidence that has been submitted into the record for purposes of your deliberations. You are prohibited and cannot conduct your own independent investigation or fact finding outside the evidence and testimony presented to you during the course of this trial. And, of course, you are not to speculate or draw any inference or conclusion from the Court's response to your inquiry during your deliberative process.
>
> I would, also, sternly admonish and remind you that this note could imply that there has been premature deliberation or discussion regarding the facts and circumstances of this case. And by your oath, you're to have on [sic] discussion about the facts and circumstances of this case until you have heard all of the evidence, you've heard the arguments of the parties and the Court has

> instructed you on the law and released you to begin your deliberations.

(R. p. 563, line 24 – 564, line 6).

Defense counsel offered no further objection or argument and rested his prior *in camera* request. (R. p. 564, lines 9-11).

Discussion:

"The granting or refusing of a motion for a mistrial lies within the sound discretion of the trial court and its ruling will not be disturbed on appeal absent an abuse of discretion amounting to an error of law." *State v. Harris*, 340 S.C. 59, 63, 530 S.E.2d 626, 627–28 (2000). "An abuse of discretion arises from an error of law or a factual conclusion that is without evidentiary support." *State v. Irick*, 344 S.C. 460, 464, 545 S.E.2d 282, 284 (2001).

The grant of a mistrial "is an extreme measure which should be taken only where an incident is so grievous that the prejudicial effect can be removed in no other way." *State v. Herring*, 387 S.C. 201, 216, 692 S.E.2d 490, 498 (2009) (citing *State v. Beckham,* 334 S.C. 302, 513 S.E.2d 606 (1999)). Stated differently, "[a] mistrial should only be granted when absolutely necessary." *State v. Harris*, 340 S.C. 59, 63, 530 S.E.2d 626, 628 (2000) (citing *State v. Council,* 335 S.C. 1, 12, 515 S.E.2d 508, 514 (1999)).

In his argument to this Court, Appellant asserts simply that the foreperson's note conclusively established that the jury had engaged in premature deliberations. (BOA at 4; *see also* BOA at 10, "the jurors' note shows that premature deliberations occurred"). In contrast, the trial judge assessed that it did not. (R. p. 561, lines 8-10, "there's no evidence in the record to indicate that they are prematurely deliberating"). Appellant's argument fails to afford the deference to the trial judge that precedent dictates in appellate review. *Harris, supra.* The note itself does not plainly indicate discussions as to weight or impact of the evidence by the jury. As the trial judge

recognized, the note is not even attributed to the jury or multiple jurors and may have simply been from the foreperson. (R. p. 560, lines 1-6). That does not show even discussion among the jurors. A juror's question about evidence does not equate with deliberations. For instance, in *State v. Farrow*, 332 S.C. 190, 504 S.E.2d 131 (Ct. App. 1998), this Court considered a juror's note[1] that requested "the type, model, resolution, technical operation capabilities, and mounting of the Majik Market video surveillance camera which was used to record the robbery" and "the type of video printer which was used to generate certain video stills and to prepare a photo array shown to the store clerk for identification purposes." *Id.* at 193, 504 S.E.2d at 132. As to the suggestion on appeal "that the juror's questions" constituted "evidence [of] premature deliberations," this Court soundly rejected that suggestion finding "Farrow offers no support for this position and we can find none in the record before us." *Id*. at 196, 504 S.E.2d at 134.

Similarly, in *State v. Hoffman*, 312 S.C. 386, 440 S.E.2d 869 (1994), Hoffman argued "the trial court erred in denying his mistrial motion after the jury foreman sent a note to the judge asking if the jury could ask questions of witnesses to clarify testimony." 312 S.C. at 391, 440 S.E.2d at 872. The first part of the note made specific reference to testimony by a fingerprint expert and the presence or absence of prints, the foreperson's understanding, and a request for clarification. *Id.* Further in the note, the foreman asked about whether "we have a right to clarify and how do we do so?" *Id.* Like Appellant in this appeal, "Hoffman argue[d] that this note is clear evidence that

[1] In *Farrow*, this Court referred to our Supreme Court's decision in *Day v. Kilgore*, 314 S.C. 365, 444 S.E.2d 515 (1994), which recognized that "[t]he majority of jurisdictions hold that whether to allow questions by the jury is within the sound discretion of the trial judge," but also recognized significant dangers in the process resulting in a procedure to critically consider the question without imposing a wholesale prohibition of such questions. 314 S.C. 365, 367 and 370-371, 444 S.E.2d at 517 and 518-519. Again, the mere asking of fact questions by a juror does not equate with deliberations or the asking of such questions would, logically, have to be prohibited and not merely subject to keen scrutiny.

the jury began deliberations during the course of the trial." *Id.* The trial judge did not interpret the note as supportive of premature deliberations. Our Supreme Court agreed observing that "[t]he trial judge considered the note in its entirety, and in exercising his discretion, found that the note showed that the jury was merely attempting to define their role in the trial process rather than deliberating on the merits. The wording of the note in the record amply supports the judge's findings …." 312 S.C. at 392, 440 S.E.2d at 873. The Court also noted that "any potential harm was cured with the instruction issued by the court," and found "the trial court was correct in refusing to grant Hoffman's mistrial motion." *Id.* This appeal closely tracks the factual scenario in *Hoffman* and the result should be the same.

In sum, Appellant has not shown an absence of factual support for the trial judge's critical fact-finding; thus, he is not entitled to any relief because his argument is dependent on an erroneous factual assertion. *See Irick, supra.* Further, the judge's preventative instructions worked to ensure that there would not be premature deliberations.[2] Simply, Appellant cannot show he is entitled to any relief. In his argument urging this Court to find error, Appellant primarily relies on *State v. Aldret*, 333 S.C. 307, 509 S.E.2d 811 (1999), and *State v. Gill*, 273 S.C. 190, 255 S.E.2d 455 (1979). (*See* BOA at 9-10). That reliance is misplaced.

---

[2] Moreover, the trial judge in this case initially instructed the jurors in the court's opening comments: "Until I advise you to begin your deliberations, you must not discuss this case with anyone. That includes among yourselves, friends, family members or anyone involved in the case. After the case is submitted to you, you must discuss it only in the jury room with your fellow jurors." (R. p. 8, lines 5-9; see also 9, lines 1-9, "essential that you maintain and keep an open mind and not decide any issue until you have heard all of the evidence, the parties have made their closing arguments and [the court has] instructed you on the law."). This supports even more that there were no premature deliberations of the evidence as jurors are presumed to follow their instructions. *See.,e.g., State v. Young*, 420 S.C. 608, 623, 803 S.E.2d 888, 896 (Ct. App. 2017) (acknowledging presumption that "juries follow their instruction").

In *Aldret,* our Supreme Court held that "premature jury deliberations may affect 'fundamental fairness' of a trial such that the trial court may inquire into such allegations and may consider affidavits in support of such allegations." 333 S.C. at 312, 509 S.E.2d at 813. However, Aldret had not requested during trial that the jurors be questioned on possible deliberation and possible prejudice; therefore, the issue was not properly preserved for review. *Id.* Our Court also found that premature deliberations did not support grounds for "automatic reversal," rather, a defendant must show "that such deliberations affected the jury's verdict." *Id.* at 313, 509 S.E.2d at 813-814. Applying *Aldret* here, Appellant is barred from complaining about potential prejudice when he failed to request inquiry by the judge. Further, *Aldret* set out that *if* requested, the trial judge *may* question the jurors. *Id.* at 315, 509 S.E.2d at 815. The trial judge here was satisfied the note did not reflect premature deliberations; therefore, no further inquiry would be necessary. Lastly, in this case, there is no evidence that would allow Appellant to carry his burden of showing "such deliberations affected the jury's verdict." *Id.* Thus, *Aldret* supports denial of any relief. *Gill* does not aid Appellant either.

In *Gill*, at issue was the trial court's instruction that allowed premature deliberations, though it restricted deliberations to the jury room. 273 S.C. at 191-192, 255 S.E.2d at 456. Our Supreme Court found error and found, "The trial judge should have instructed the jury to begin their deliberations only after all the evidence had been introduced, the arguments of counsel had been completed, and the applicable law had been charged." *Id.* at 192, 255 S.E.2d at 456. *Gill* supports the lack of error here. The trial judge specifically instructed the jurors, as approved in *Gill*, that they were not to deliberate "the facts and circumstances of this case until you have heard all of the evidence, you've heard the arguments of the parties and the Court has instructed you on the law and released you to begin your deliberations." (R. p. 564, lines 2-6). Appellant fails to

point out any instruction that would allow premature deliberations. *Gill* does not support that any error occurred.

In the alternative to a grant of a new trial on appeal, Appellant requests a remand for a hearing "to determine prejudice." (BOA at 11). This again assumes that the note definitively proves premature deliberations, yet, as demonstrated above, he fails to account for the deference given to the trial judge to initially make that determination. Even so, because he failed to request questioning at trial, he cannot make the request for the first time on appeal. *See Aldret,* 333 S.C. at 312, 509 S.E.2d at 813 (1999); *State v. Vang*, 353 S.C. 78, 85, 577 S.E.2d 225, 228 (Ct. App. 2003) (finding argument that the trial "judge's failure to individually question the jurors after receiving" a note from the foreperson with questions on juror information confidentiality constituted reversible error was not preserved for appellate review when "counsel did not request individual questioning of the jurors" contemporaneously at trial).

Even so, the record fully and fairly supports the trial judge's determination that the note did not constitute evidence of premature deliberations. Notably, the questions sought clarification of facts and did not indicate any decision or application of law at all. The trial judge reasonably determined the note did not support finding premature deliberations occurred thus no inquiry could be warranted. *See generally State v. Gray*, 438 S.C. 130, 145, 882 S.E.2d 469, 477 (Ct. App. 2022) (finding the trial judge did not err in denying a motion for new trial without a hearing where "juror's Facebook post" offered in support of motion "did not indicate that any extraneous prejudicial information or outside influence had an impact on the jury's deliberations; it also did not indicate that Gray's verdict was reached as a result of racial or gender intimidation or that the jury began deliberating prematurely"); *Keene v. CNA Holdings, LLC*, 426 S.C. 357, 378, 827 S.E.2d 183, 195 (Ct. App. 2019), *aff'd,* 436 S.C. 1, 870 S.E.2d 156 (2021) (where court was

satisfied "[a]fter granting Appellant's request" to question one juror that no premature deliberations took place, "it was incumbent on Appellant to ask the circuit court to voir dire the remaining jurors on their possible premature deliberations, but Appellant did not do so."). Under the deferential review afforded such determinations, this Court should affirm. *See State v. Pittman,* 373 S.C. 527, 557, 647 S.E.2d 144, 160 (2007) (finding "the trial court did not abuse its discretion in denying Appellant's motion for a new trial" where the record supported the trial judge's determination the juror did not engage in premature deliberations nor was appellant prejudiced by the juror's conversations with others); *see also Irick,* 344 S.C. at 464, 545 S.E.2d at 284 ("An abuse of discretion arises from an error of law or a factual conclusion that is without evidentiary support."). Further, the trial judge carefully instructed the jury to prevent actual premature deliberations and prejudice. The record shows no abuse of discretion and no potential for prejudice. Appellant's position to the contrary should be rejected.

CONCLUSION

For all the foregoing reasons, this Court should affirm.

Respectfully submitted,

ALAN WILSON
Attorney General

W. JEFFREY YOUNG
Chief Deputy Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211
(803) 734-6305

SCARLETT A. WILSON
Solicitor, Ninth Judicial Circuit
101 Meeting St., Ste. 400
Charleston, South Carolina 29401
(843) 958-1900

s/Melody J. Brown
By:_____
MELODY J. BROWN
S.C. Bar No. 14244
ATTORNEYS FOR RESPONDENT

March 3, 2025

RECEIVED
Mar 03 2025
SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Charleston County
The Honorable Deadra L. Jefferson, Circuit Court Judge

THE STATE,

Respondent,

v.

ALONZA DONTAE MARABLE, JR.,

Appellant.

Appellate Case No. 2023-000988

PROOF OF SERVICE

I as an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Final Brief of Respondent, and Proof of Service has been forwarded to Appellant's counsel, David Alexander, Esquire, via email today, March 3, 2025 to DAlexander@sccid.sc.gov and to his assistant, Chris Stock, at CStock@sccid.sc.gov.

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

This is the 3rd day of March, 2025.

s/ Angela Brown
Legal Assistant to Melody J. Brown
Senior Assistant Deputy Attorney General

Angela Brown

To: DavidAlexander; Stock, Chris
Cc: Melody Brown
Subject: The State v. Alonza Marable (2023-000988)
Attachments: Marable, Alonza - Final Brief of Respondent.pdf

Mr. Alexander, please find attached the Final Biref of Respondent in reference to the above appeal. The brief will be electronically with the SC Court of Appeals on today's date.

Thank you,

Angela Bennett Brown, Administrative Coordinator II
Office of the South Carolina Attorney General
Criminal Division | Office 803-734-0368 | Abennett@scag.gov
P.O. Box 11549 | Columbia, SC 29211