

APPENDICES TO PART II
FORM 15. RECORD ON APPEAL
THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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MAR 10 2025

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

SC Court of Appeals

Perry H, Gravely, Administrative Judge

case no. 2022-CP-39-00680
Appellate no. 2022-000972

Robert Earl Dillard, as Personal Representative of the case of
Robert Earl Dillard Appellant.

v,

The State of South Carolina

Respondent,

RECORD ON APPEAL

Robert Earl Dillard pro-se
Perry Correctional Inst,
430 oaklawn Road Q4B-209
Pelzer, S.C. 29669

Medoley Jane Brown ESQ
Attorney General office
post office box 11549
Columbia, S.C. 29211

INDEX

Order of February 11, 1997.....	1
Order of march 2, 1995.....	1
complaint.....	1
answer.....	1
Testimony	
Robert E, Dillard.....	1
Deposition of James F, Simpson.....	1
Robert E, Dillard.....	1

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM PICKENS COUNTY
Perry H, Gravely, Circuit Judge

Robert Earl Dillard,

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Appellant,

MAR 10 2025

SC Court of Appeals

v,

The State South Carolina

Respondent,


Rule 267

APPELLATE COURT RULES

RECORD ON APPEAL

Medoley J, Brown, Esquire
Attorney General Office
Post Office Box 11549
Columbia, S.C. 29211

date 3-4- 2025.


~~Robert Earl Dillard #220043~~
Perry Correctional Inst,
430 Oaklawn Road Q4B/209
Pelzer, S.C. 29669

Charge.....	2
Request to Charge.....	2
Defendant's Exhibits	
1.....	2
13-16.....	2
17-19.....	2
Certificate of Appellant.....	3

Order of February 11, 1997

Set out entire order including caption and signature.]

Order of March 2, 1995

Set out entire order including and signature.]

Complaint

Set out entire complaint including caption and signature.]

- (1) After-discovered evidence of Solicitor's Knowing use of Perjured testimony.
- (2) Denial of due Process by trial Judge's definition of 'reasonable doubt'.
- (3) Applicant's Murder Indictment(s) was not lawfully Presented by a grand Jury for trial of his Case(s).

Answer

Set out entire answer including caption and signature.]

Testimony of James F, Simpson

Direct by Solicitor Michale W,Barcroft

Set out testimony including entire pages of trial transcript
Where a Portion of the page is to be included.]page 632 and
the entire Perjury Testimony and Brady Violation
Cross by Attorney Richard Water.

Deposition of James F, Simpson

Set out testimony including entire pages of trial transcript
Where a portion of the pageis to be included.]

Charge

[Set out the portions of Jury Charge designated to be included
Where a portion of a page of the charge is to be includedthe
page.page 655.] Voluntary manslaughter. to a Invaild Indictment.

Request to Charge by the Jury.]

Set out request to Charge by the Jury.]page 681-682
Denial the Jury the definition ofReasonable Doubt
When the Jury had commenced deliberations,word was sent from
the Jury Room that they needed to know the definition of
Reasonable Doubt, because they was confuse of the Law.

Defendant's Exhibit 13-16

[Set out exhibit.]

Defendant's Exhibit 17-19

[Set out exhibit.]

Certificate of Counsel

The undersigned hereby certifies that the Record on Appeal
contains all material ProPosed to be included by any of the
parties and not any other material.

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MAR 04 2025

PCI MAILROOM

date 3-4 2025.

Robert Earl Dillard
Robert Earl Dillard#220045
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Pelzer, S.C. 29669