

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

On Petition for Writ of Certiorari to the Court of Common Pleas
Appeal from Williamsburg County
Honorable R. Ferrell Cothran, Trial Judge
Honorable R. Kirk Griffin, Post-Conviction Relief Judge
Appellate Case No. 2023-001321

MAR 21 2025

SC Court of Appeals

ROBERT LEE REDDOCK,

Petitioner,

vs.

STATE OF SOUTH CAROLINA,

Respondent.

**MOTION TO PERMIT THE INCLUSION
OF A COPY OF AN EXHIBIT
IN THE RECORD ON APPEAL**

Respondent ("the State"), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

In July of 2019, Petitioner Robert Lee Reddock was arrested following an investigation into an armed robbery at Vicki's Convenience Store. In December of 2019, the Williamsburg County Grand Jury indicted Petitioner for two counts of Armed Robbery, two counts of Conspiracy, one count of Failure to Stop for a Blue Light, and one count of Possession of a Weapon During a Violent Crime. Based on Applicant's prior convictions, the State noticed Applicant with its intention to seek life without parole pursuant to S.C. Code Ann. § 17-25-45. On June 14m

2021, a jury trial commenced in the Williamsburg County Court of General Sessions with the Honorable R. Ferrell Cothran, circuit court judge, presiding.¹ On June 17, 2021, at the conclusion of the trial, the jury convicted Petitioner as indicted. Judge Cothran sentenced Petitioner to life imprisonment without the possibility of parole pursuant to S.C. Code Ann. § 17-25-45. Petitioner did not appeal his convictions and sentence. Appellant then timely filed a notice of appeal.

II.

On February 4, 2022, Petitioner filed a post-conviction relief application. On June 13, 2023, a hearing into the matter was convened before the Honorable R. Kirk Griffin at the Sumter County Courthouse. Following the hearing, Judge Griffin found trial counsel constitutionally ineffective for failing to inform Petitioner of his right to appeal and dismissed all other claims. The order granting a belated appeal pursuant to *White v. State* and dismissing all other allegations was filed on August 11, 2023. On August 21, 2023, Petitioner filed a notice of appeal. On March 27, 2024, counsel for Petitioner filed the Brief of Petitioner Pursuant to *White v. State* and Appendix, which referenced State's Exhibit No. 1 (Video from Vicki's Store)².

III.

On March 28, 2024, the Supreme Court of South Carolina issued an order for the Williamsburg County Clerk of Court to release State's Exhibit 1 to the South Carolina Attorney General's Office for transport. The Attorney General's Office has been informed by the Williamsburg County Clerk of Court's Office that the original State's Exhibit No. 1 is currently sealed in a vault by the South Carolina Law Enforcement Division and is unavailable.

¹ Petitioner was ultimately tried for Armed Robbery, Conspiracy, and Possession of a Weapon During a Violent Crime.

² During Petitioner's trial, this recording was presented to and considered by the jury. (ROA p. 54).

Additionally, the Attorney General's Office has been informed that entry into the vault containing the Exhibit necessitates the use of a HAZMAT suit.

IV.

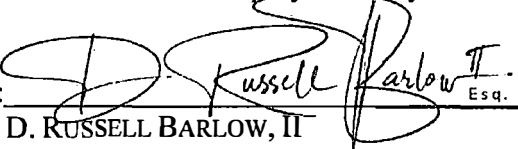
Because the designated exhibit—a copy of which has been included with Respondent's motion as an attachment—has properly been designated for inclusion in the Record on Appeal and is relevant to the resolution of Petitioner's appeal, the Record on Appeal cannot be adequately completed without its inclusion. See Rule 210(c), SCACR ("The Record on Appeal shall include all matter designated to be included by any party under Rule 209 and shall comply with the requirements of Rule 267."). Therefore, in order to enable the proper completion of the appellate record, Respondent asks this Court to allow the inclusion of the attached copy of the designated exhibit in the Record on Appeal based on the parties' consent—to the best of their knowledge—truly and accurately reflects the exhibit that was before the jury in Petitioner's case.

WHEREFORE, Respondent prays the Court will allow the inclusion in the Record on Appeal of what is believed to be a complete and accurate copy of the security video recording before the jury in Petitioner's case and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

D. RUSSELL BARLOW, II
Senior Assistant Deputy Attorney General

By:  Esq.
D. RUSSELL BARLOW, II
S.C. Bar Number 105228

March 21, 2025

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

MAR 21 2025

SC Court of Appeals

On Petition for Writ of Certiorari to the Court of Common Pleas
Appeal from Williamsburg County
Honorable R. Ferrell Cothran, Trial Judge
Honorable R. Kirk Griffin, Post-Conviction Relief Judge
Appellate Case No. 2023-001321

ROBERT LEE REDDOCK,

Petitioner,

vs.

STATE OF SOUTH CAROLINA,

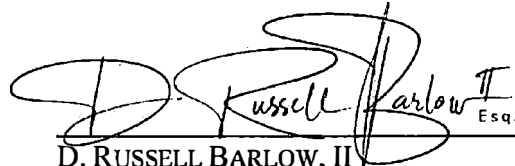
Respondent.

PROOF OF SERVICE

I, D. Russell Barlow, II, certify I have served the within Motion to Permit the Inclusion of a Copy of an Exhibit in the Record on Appeal by emailing a copy to the AIS address listed on the following individual:

Sarah E. Shipe, Esquire
sshipe@sccid.sc.gov

I further certify all parties required by Rule to be served have been served.
This 21st day of March, 2025.



D. RUSSELL BARLOW, II
Senior Assistant Deputy Attorney General
Office of the Attorney General