

From: [Keesley, William P.](#)
To: [Melody Brown](#); [Tommy Evans, Jr.](#); [Charles Grose](#)
Cc: [Rosalind Major](#); [Brandon Larrabee](#); [Shealy, Brenda](#); [Campbell, James C.](#); [Angela Brown](#); [Keesley, William P. Law Clerk \(Samuel Kinard\)](#)
Subject: RE: Stone v. State, Case No. 2018CP4301205
Date: Thursday, April 3, 2025 8:42:08 AM
Attachments: [image001.png](#)

The deadline is extended. Thank you for the update. [wpk]

From: Melody Brown <MBrown@scag.gov>
Sent: Thursday, April 3, 2025 8:08 AM
To: Keesley, William P. <WKeesleyj@sccourts.org>; Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Charles Grose <charles@groselawfirm.com>
Cc: Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesleylc@sccourts.org>
Subject: RE: Stone v. State, Case No. 2018CP4301205

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Dear Judge Keesley:

We are working to complete the brief, but out of an abundance of caution, would you consider allowing 10 more days? This will place us past the scheduled April 11th execution. I do not currently have anything pending in that matter to address, but I would expect another filing, possibly to the United States Supreme Court, that would necessarily have to be expedited. If that does not materialize, I may be able to complete review and editing of the brief in this matter next week. As this matter has four experts and a split of opinion, I would hope to have time to review our initial draft with particular care. I apologize for the delay, and I much appreciate your acknowledging our execution schedule that has greatly impacted our schedules, though I regret it has impacted yours, as well.

Thank you, sir, for considering.

Kind regards,
Melody

MELODY J. BROWN, Senior Assistant Deputy Attorney General
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Capital and Collateral Litigation Section | Office 803-734-6305 | mbrown@scag.gov
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From: Keesley, William P. <WKeesleyj@sccourts.org>
Sent: Wednesday, April 2, 2025 5:03 PM
To: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Melody Brown <MBrown@scag.gov>; Charles Grose <charles@groselawfirm.com>
Cc: Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesleylc@sccourts.org>
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As you know, I am scheduled to retire at the end of the year, and the first quarter of 2025 has already passed. I understand that the Attorney General's staff is having to deal with the frequent executions that are taking place this year, and I will be as accommodating as possible regarding a time for ending this case. Please let me know if any other extension requests are anticipated beyond the one that is upcoming. Thank you. [wpk]

From: Tommy Evans, Jr. <TommyEvansJr@scag.gov>
Sent: Friday, March 7, 2025 10:23 AM
To: Keesley, William P. <WKeesleyj@sccourts.org>; Melody Brown <MBrown@scag.gov>; Charles Grose <charles@groselawfirm.com>
Cc: Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesleylc@sccourts.org>
Subject: RE: Stone v. State, Case No. 2018CP4301205

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Thank you!

From: Keesley, William P. <WKeesleyj@sccourts.org>
Sent: Thursday, March 6, 2025 10:52 AM
To: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Melody Brown <MBrown@scag.gov>; Charles Grose <charles@groselawfirm.com>

Cc: Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesleylc@sccourts.org>

Subject: RE: Stone v. State, Case No. 2018CP4301205

The extension for 30 days is granted. Thank you.

From: Tommy Evans, Jr. <TommyEvansJr@scag.gov>

Sent: Thursday, March 6, 2025 9:59 AM

To: Keesley, William P. <WKeesleyj@sccourts.org>; Melody Brown <MBrown@scag.gov>; Charles Grose <charles@groselawfirm.com>

Cc: Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesleylc@sccourts.org>

Subject: RE: Stone v. State, Case No. 2018CP4301205

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Judge Keesley,

In the above referenced action the post-hearing brief of the Respondent's is due today. Ms. Brown is currently in litigation for death penalty case of Brad Keith Sigmond who is scheduled for execution tomorrow. It would be difficult for us to be able to complete the brief when Ms. Brown is currently occupied with the Sigmond execution. We would ask if the Court would allow us a 30-day extension for the submission of the post-hearing brief. Your attention and assistance in this matter is greatly appreciated.

Tommy Evans, Jr.
Assistant Attorney General
S.C. Office of the Attorney General

From: Keesley, William P. <WKeesleyj@sccourts.org>

Sent: Thursday, February 13, 2025 4:06 PM

To: Melody Brown <MBrown@scag.gov>; Charles Grose <charles@groselawfirm.com>

Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesleylc@sccourts.org>

Subject: RE: Stone v. State, Case No. 2018CP4301205

A status update is attached. The original will be filed with the Supreme Court of South Carolina. Thank you. [wpk]

From: Melody Brown <MBrown@scag.gov>

Sent: Friday, January 31, 2025 7:27 PM

To: Charles Grose <charles@groselawfirm.com>; Keesley, William P. <WKeesleyj@sccourts.org>

Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>;

Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>

Subject: RE: Stone v. State, Case No. 2018CP4301205

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Dear Judge Keesley:

My recollection was the State had asked for 30 days to submit its brief after Applicant's brief is submitted. If Mr. Stone's brief is submitted on Feb. 4, 2025, then our brief would be due on or about March 6, 2025. We can work earnestly on our brief after review of the applicant's arguments, but I write to point out that we currently anticipate that time period to coincide with another execution process. The next execution is presently expected to be set for March 7, 2025 under the current state Supreme Court order. If execution litigation is heavy in that timeframe, we may have to respectfully seek additional time to allow completion of the briefing, if you would be so inclined as to consider such request. It would be much appreciated if you would. Thank you.

Kind regards,

MELODY J. BROWN, Senior Assistant Deputy Attorney General

Office of the South Carolina Attorney General

Capital and Collateral Litigation Section | Office 803-734-6305 | mbrown@scag.gov

P.O. Box 11549 | Columbia, SC 29211

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From: Charles Grose <charles@groselawfirm.com>

Sent: Friday, January 31, 2025 5:21 PM

To: Keesley, William P. <WKeesleyj@sccourts.org>; Melody Brown <MBrown@scag.gov>

Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@sccourts.org>;

Campbell, James C. <JACampbell@sumtercountysc.org>

Subject: Re: Stone v. State, Case No. 2018CP4301205

Dear Judge Keesley,

By our calculations, Mr. Stone's post-hearing brief is due on Tuesday, February 4, 2025. We are on pace to submit it on the 4th.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

Best,
Charles

E. Charles Grose, Jr.
The Grose Law Firm, LLC
305 Main Street
Greenwood, SC 29646
Phone: 864-538-4466
Fax: 864-538-4405
Web: GroseLawFirm.com
Email: charles@groselawfirm.com

From: Keesley, William P. <WKeesleyj@sccourts.org>
Date: Friday, January 31, 2025 at 5:15 PM
To: Charles Grose <charles@groselawfirm.com>, Melody Brown <MBrown@scag.gov>
Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>, Rosalind Major <rosalind@justice360sc.org>, Brandon Larrabee <brandonlarrabee@scag.gov>, Shealy, Brenda <BShealy@sccourts.org>, Campbell, James C. <JACampbell@sumtercountysc.org>
Subject: RE: Stone v. State, Case No. 2018CP4301205

Would the attorneys please provide me with your status? Thank you. [wpk]

From: Charles Grose <charles@groselawfirm.com>
Sent: Thursday, January 16, 2025 3:18 PM
To: Keesley, William P. <WKeesleyj@sccourts.org>; Melody Brown <MBrown@scag.gov>
Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>
Subject: Re: Stone v. State, Case No. 2018CP4301205

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Thanks, all.

Best,
Charles

E. Charles Grose, Jr.
The Grose Law Firm, LLC

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Greenwood, SC 29646
Phone: 864-538-4466
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Web: GroseLawFirm.com
Email: charles@groselawfirm.com

From: Keesley, William P. <WKeesleyj@sccourts.org>
Date: Thursday, January 16, 2025 at 2:25 PM
To: Charles Grose <charles@groselawfirm.com>, Melody Brown <MBrown@scag.gov>
Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>, Rosalind Major <rosalind@justice360sc.org>, Brandon Larrabee <brandonlarrabee@scag.gov>
Subject: RE: Stone v. State, Case No. 2018CP4301205

The extension is granted. Thank you. [wpk]

From: Charles Grose <charles@groselawfirm.com>
Sent: Thursday, January 16, 2025 2:14 PM
To: Melody Brown <MBrown@scag.gov>; Keesley, William P. <WKeesleyj@sccourts.org>
Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Rosalind Major <rosalind@justice360sc.org>; Brandon Larrabee <brandonlarrabee@scag.gov>
Subject: Re: Stone v. State, Case No. 2018CP4301205

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Dear Judge Keesley,

Mr. Stone's post-hearing brief is due on Tuesday, January 21st. Ms. Major and I respectfully request a two-week extension. We consulted the State, and Mr. Evans consented to this request.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

Best,
Charles

E. Charles Grose, Jr.
The Grose Law Firm, LLC
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Greenwood, SC 29646
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Fax: 864-538-4405
Web: GroseLawFirm.com
Email: charles@groselawfirm.com

From: Melody Brown <MBrown@scag.gov>
Date: Wednesday, November 20, 2024 at 1:41 PM
To: Keesley, William P. <WKeesleyj@sccourts.org>, Charles Grose <charles@groselawfirm.com>
Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>, Rosalind Major <rosalind@justice360sc.org>, Brandon Larrabee <brandonlarrabee@scag.gov>
Subject: RE: Stone v. State, Case No. 2018CP4301205

Good afternoon:

The State does not object to the requested 60 days to brief. As I understand it, it was requested at the close of the hearing that the State be allowed 30 days to submit its post-hearing brief after Applicant's brief is received. We would just like to keep to that general schedule if your Honor would be so inclined.

Also, we have received a copy of the transcript as well; however, our copy had an error on the cover which I understand is being corrected. I will be happy to forward a copy to you as soon as we have the corrected page.

Thank you.

Kind regards,
Melody

MELODY J. BROWN, Senior Assistant Deputy Attorney General
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From: Keesley, William P. <WKeesleyj@sccourts.org>
Sent: Wednesday, November 20, 2024 1:05 PM
To: Charles Grose <charles@groselawfirm.com>
Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Melody Brown <MBrown@scag.gov>; Rosalind Major <rosalind@justice360sc.org>
Subject: RE: Stone v. State, Case No. 2018CP4301205

What is the State's position on scheduling the post-hearing briefs? Thank you. [wpk]

From: Charles Grose <charles@groselawfirm.com>
Sent: Wednesday, November 20, 2024 11:40 AM
To: Keesley, William P. <WKeesleyj@sccourts.org>
Cc: Tommy Evans, Jr. <TommyEvansJr@scag.gov>; Melody Brown <MBrown@scag.gov>; Rosalind Major <rosalind@justice360sc.org>
Subject: Stone v. State, Case No. 2018CP4301205

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Dear Judge Kelsey,

Counsel for Mr. Stone received the transcript of the evidentiary hearing, Today, November 20, 2024. Given the upcoming holidays and our other professional obligations, Ms. Major and I would respectfully request 60 days to complete our post-hearing brief.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

Best,
Charles

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