

From: Keesley, William P.  
To: Charles Grose <charles@groslawfirm.com>  
Cc: Tommie Evans <tommyevans@scag.gov>; Rosalind Major <rosalind@justice360c.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@scourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesley@scourts.org>  
Subject: RE: Stone v. State, Case No. 2018CP4301205  
Date: Friday, April 18, 2025 10:42:49 AM

The request is granted. Thank you. [wpk]

From: Charles Grose <charles@groslawfirm.com>  
Sent: Friday, April 18, 2025 10:37 AM  
To: Keesley, William P. <W.Keesley@scourts.org>; Melody Brown <mbrown@scag.gov>  
Cc: Tommie Evans <tommyevans@scag.gov>; Rosalind Major <rosalind@justice360c.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@scourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesley@scourts.org>  
Subject: RE: Stone v. State, Case No. 2018CP4301205

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Judge Keesley,

We would like to reply to the State's post-hearing return and respectfully request 21 days to file and serve this Reply. We will do our best to file sooner.

Thank you for your attention to this matter. Please let us 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@groslawfirm.com](mailto:charles@groslawfirm.com)

From: Keesley, William P. <W.Keesley@scourts.org>  
Date: Friday, April 18, 2025 at 1:58 AM  
To: Melody Brown <mbrown@scag.gov>  
Cc: Tommie Evans <tommyevans@scag.gov>; Charles Grose <charles@groslawfirm.com>; Rosalind Major <rosalind@justice360c.org>; Brandon Larrabee <brandonlarrabee@scag.gov>; Shealy, Brenda <BShealy@scourts.org>; Campbell, James C. <JACampbell@sumtercountysc.org>; Angela Brown <abennett@scag.gov>; Keesley, William P. Law Clerk (Samuel Kinard) <wkeesley@scourts.org>  
Subject: RE: Stone v. State, Case No. 2018CP4301205

Thank you. You do not need to send paper copies to me. (WPK)

On Apr 17, 2025 at 10:45 PM, <Melody Brown <mbrown@scag.gov>> wrote:

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Judge Keesley:

Attached is a PDF copy of Respondent's post-hearing brief. We will send out paper copies tomorrow to be filed with the Clerk of Court and also serve opposing counsel with paper copies as well. Additionally, I will mail two paper copies to you for your ease in review unless you are satisfied with the pdf copy alone. As always, should you require anything further, please do not hesitate to contact me.

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](mailto:mbrown@scag.gov)  
P.O. Box 11549 | Columbia, SC 29211  
<https://www.justicecheckpoints.com/v2/d0/> | <http://www.scag.gov/> |

Subject: RE: Stone v. State, Case No. 2018CP430125

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*  
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

scag.gov <<https://project.checkpoint.com/240/>> | <http://www.scag.gov/> | [YzJ1On5mYk3WNgYw6YzpsQzqZmM4ZDE30W1NsrQ2TKtVYAINDFmYVYzpsYmM3Q6cZTcNzpmZTZGZUW2M2E5yMNYU4NDf0M0qM6fNGGozZWFfMAYTtMeNzY5ZG11NTYVWYNDZmMWQ0M2VAYmQJNTEyOm6RiPc](mailto:YzJ1On5mYk3WNgYw6YzpsQzqZmM4ZDE30W1NsrQ2TKtVYAINDFmYVYzpsYmM3Q6cZTcNzpmZTZGZUW2M2E5yMNYU4NDf0M0qM6fNGGozZWFfMAYTtMeNzY5ZG11NTYVWYNDZmMWQ0M2VAYmQJNTEyOm6RiPc)

[mailto:scag]

This email, along with any attachments, is considered confidential and may be legally privileged. If you have received it in error please notify the sender immediately by reply email and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. This email, and attachments, are subject to FOIA requests. Thank you for your cooperation.

From: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>>  
Sent: Friday, January 31, 2025 5:21 PM

To: Keesley, William P. <[W.Keesley@accourts.org](mailto:W.Keesley@accourts.org)>; Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>; Shelly, Brenda <[BShealy@accourts.org](mailto:BShealy@accourts.org)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: RE: Stone v. State, Case No. 2018CP430125

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](mailto:charles@groselawfirm.com)

From: Keesley, William P. <[W.Keesley@accourts.org](mailto:W.Keesley@accourts.org)>>  
Date: Friday, January 31, 2025 at 5:15 PM

To: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>; Shelly, Brenda <[BShealy@accourts.org](mailto:BShealy@accourts.org)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: RE: Stone v. State, Case No. 2018CP430125

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

From: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>>  
Sent: Thursday, January 16, 2025 3:18 PM

To: Keesley, William P. <[W.Keesley@accourts.org](mailto:W.Keesley@accourts.org)>; Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: RE: Stone v. State, Case No. 2018CP430125

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Thanks, all.

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](mailto:charles@groselawfirm.com)

From: Keesley, William P. <[W.Keesley@accourts.org](mailto:W.Keesley@accourts.org)>>  
Date: Thursday, January 16, 2025 at 2:25 PM

To: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: RE: Stone v. State, Case No. 2018CP430125

The extension is granted. Thank you. [wpk]

From: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>>  
Sent: Thursday, January 16, 2025 2:14 PM

To: Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Keesley, William P. <[W.Keesley@accourts.org](mailto:W.Keesley@accourts.org)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: RE: Stone v. State, Case No. 2018CP430125

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

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

305 Main Street  
Greenwood, SC 29646

Phone: 864-538-4466  
Fax: 864-538-4405

Web: GroseLawFirm.com

Email: [charles@groselawfirm.com](mailto:charles@groselawfirm.com)

From: Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>>  
Date: Wednesday, November 20, 2024 at 1:41 PM

To: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: RE: Stone v. State, Case No. 2018CP430125

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  
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

scag.gov <<https://project.checkpoint.com/240/>> | <http://www.scag.gov/> | [YzJ1On5mYk3WNgYw6YzpsQzqZmM4ZDE30W1NsrQ2TKtVYAINDFmYVYzpsYmM3Q6cZTcNzpmZTZGZUW2M2E5yMNYU4NDf0M0qM6fNGGozZWFfMAYTtMeNzY5ZG11NTYVWYNDZmMWQ0M2VAYmQJNTEyOm6RiPc](mailto:YzJ1On5mYk3WNgYw6YzpsQzqZmM4ZDE30W1NsrQ2TKtVYAINDFmYVYzpsYmM3Q6cZTcNzpmZTZGZUW2M2E5yMNYU4NDf0M0qM6fNGGozZWFfMAYTtMeNzY5ZG11NTYVWYNDZmMWQ0M2VAYmQJNTEyOm6RiPc)

[mailto:scag]

This email, along with any attachments, is considered confidential and may be legally privileged. If you have received it in error please notify the sender immediately by reply email and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. This email, and attachments, are subject to FOIA requests. Thank you for your cooperation.

From: Keesley, William P. <[W.Keesley@accourts.org](mailto:W.Keesley@accourts.org)>>  
Sent: Wednesday, November 20, 2024 1:05 PM

To: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>; Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: RE: Stone v. State, Case No. 2018CP430125

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

From: Charles Grose <[charles@groselawfirm.com](mailto:charles@groselawfirm.com)>>  
Sent: Wednesday, November 20, 2024 11:40 AM

To: Keesley, William P. <[W.Keesley@accourts.org](mailto:W.Keesley@accourts.org)>; Melody Brown <[MBrown@scag.gov](mailto:MBrown@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Brandon Larrabee <[BrandonLarrabee@scag.gov](mailto:BrandonLarrabee@scag.gov)>

Cc: Tommy Evans, Jr. <[TommyEvans@scag.gov](mailto:TommyEvans@scag.gov)>; Rosalind Major <[Rosalind@justice360sc.org](mailto:Rosalind@justice360sc.org)>; Campbell, James C. <[JCampbell@sumtercountysc.org](mailto:JCampbell@sumtercountysc.org)>

Subject: Stone v. State, Case No. 2018CP430125

\*\*\* EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Judge Keesley,

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

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](mailto:charles@groselawfirm.com)

--- CONFIDENTIALITY NOTICE --- This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.