

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Appeal from Charleston County General Sessions
The Honorable Jennifer McCoy, Circuit Court Judge

APR 18 2025

SC Court of Appeals

Appellate Case No.: 2024-001992

CASEY LEE COMBS.....APPELLANT

v.

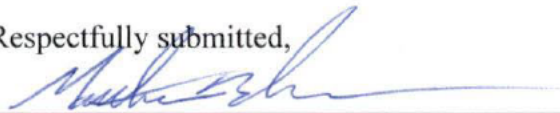
S.C. DEPARTMENT OF PROBATION, PAROLE AND
PARDON SERVICES,.....RESPONDENT

MOTION TO FILE AMENDED INITIAL BRIEF

Undersigned counsel respectfully asks this Court to allow the submission of an amended initial brief in this matter. Counsel had reported a fact that was implied in the record, yet upon consulting with the Probation Agent, determined that the information was incorrect. Counsel has removed the incorrect statement and asks this Court to accept the amended brief.

Counsel has confirmed this information with Appellant’s counsel Elizabeth Franklin-Best, who consents to this motion.

Respectfully submitted,



Matthew C. Buchanan
General Counsel

South Carolina Department of Probation,
Parole and Pardon Services
P.O. Box 293
Columbia, South Carolina 29202
(803) 734-9220

April 16, 2025

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from the Ninth Circuit, Charleston County
The Honorable Jennifer McCoy, Circuit Court Judge

Appellate Case No.: 2024-001992

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SC Court of Appeals

THE STATE,

RESPONDENT

v.

CASEY LEE COMBS,

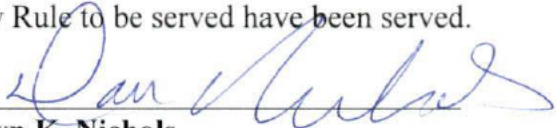
APPELLANT

CERTIFICATE OF SERVICE

I, Dawn K. Nichols, Executive Assistant, hereby certify that I have served the within *Motion to File Amended Initial Brief and Amended Initial Brief* on Appellant this 16th day of April, 2025, by depositing a copy of the same in the United States mail, postage prepaid, addressed to:

Elizabeth Franklin-Best, Esquire
3710 Landmark Drive, Suite 113
Columbia, SC 29204

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


Dawn K. Nichols
Executive Assistant
South Carolina Department of Probation,
Parole, and Pardon Services
P. O. Box 207
Columbia, South Carolina 29202

State of South Carolina
Department of Probation, Parole and Pardon Services

HENRY McMASTER
Governor



JAKE GADSDEN, JR.
Director

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SC Court of Appeals

April 16, 2025


The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

RE: **State v. Casey Combs**
Appellate Case No.: 2024-001992

Dear Ms. Kitchings:

Please find enclosed the Respondent's Motion to File Amended Initial Brief and Amended Initial Brief in the above referenced matter. Thank you for your assistance in this matter.

Sincerely,


Matthew C. Buchanan
General Counsel

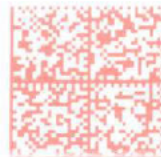
MCB:dn
Enclosures

cc: Elizabeth Franklin-Best, Esquire

State of South Carolina

Department of Probation, Parole, and Pardon Services

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SC Court of Appeals

The Honorable Jenny Kitchings
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