

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

Appeal From Richland County Court of Common Pleas  
The Honorable Kristi F. Curtis, Circuit Court Judge  
The Honorable Daniel Coble, Circuit Court Judge  
Circuit Case No. 2024-CP-40-01737

AUG 13 2025

SC Court of Appeals

APPELLATE CASE NO. 2025-000762

Alonzo C. Jeter, III, .....APPELLANT,

V

State of South Carolina; Alan McCrory Wilson;  
Chelsey F. Marto; Joseph Derham Cole; Mark J.  
Hayes, II; Ralph Keith Kelly; Brandy W. McBee;  
Tonnya K. Kohn; Jean Hoefler Toal; Donald W.

Beatty, .....RESPONDENTS.

AMENDED

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record On Appeal:

**Order (July 30, 2024)**

**Order of Dismissal (September 13, 2024)**

**Form 4 Order Denying Motion to Reconsider (March 18, 2025)**

**Complaint – Declaratory Judgment & Prospective Injunction (March 18, 2024)**

**Motion To Dismiss of State and Wilson**

**Return To State and Wilson’s Motion To Dismiss**

**Return To Remaining Defendants’ Motion To Dismiss**

**\Memorandum In Support of Motion To Dismiss (State and Wilson)**

**Memorandum In Support of Motion To Dismiss (Remaining Defendants)**

**Objection To Motion To Dismiss, Unfair Surprise Hearing, Motion For An Additional Hearing and Copy of Hearing Transcript & Judicial Notice**

**Motion To Alter or Amend Judgment & For Reconsideration**

**Motion For a Hearing On The Rule 59(E) SCRPC Motion**

**Motion For Judicial Notice & Addendum TO Rule 59(E) Motion**

**Renewed Motion For A Hearing On Rule 59(E) Motions**

**Renewed Motion For A New Trial**

**Motion For Judicial Notice of Public Interest/Public Importance Standing**

**Motion To Amend Complaint**

**Supplemental Motion To Alter or Amend Judgment II**

**Motion For Relief From Judgment (Rule 60(b), SCRPC)**

**Motion To Alter or Amend Judgment; Motion For Additional Facts and Findings**

**Motion For Clarification**

**Motion For Judicial Notice of Transcript and Memorandum In Support**

**TRANSCRIPT of June 13, 2024 Proceeding**

**EXHIBIT: Administrative Order Re: Appointment of Counsel in Post-Conviction Relief Cases Before the Circuit Court (October 6, 2008), Order No. 2008-10-06-01**

**EXHIBIT: Transcript of March 31, 2022 Proceeding (*Case 2019-CP-11-00457*)**

**EXHIBIT: Proposed Amended Complaint**

**EXHIBIT: Plaintiff's Exhibits A thru R (*331-Page Exhibit*)**

**EXHIBIT: ORDER of S.C. Court of Appeals' Rule 243(c), SCRPC, Denial in 2019-CP-11-04571 Appeal (October 28, 2022)**

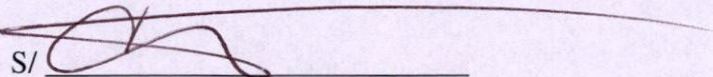
**Richland County Docket Sheet for Case 2024-CP-40-01737**

---

**CERTIFICATE OF RELEVANCY**  
*Rule 209, SCACR*

---

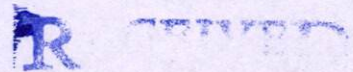
I, Alonzo C. Jeter, III, hereby certify that the designation contains no matter which is irrelevant to the appeal.

S/ 

Alonzo C. Jeter, III, #282902  
APPELLANT / pro se

Lee Correctional Institution  
990 Wisacky Hwy.  
Bishopville, South Carolina 29010

This 11<sup>th</sup> day of August, 2025



AUG 13 2025

SC Court of Appeals

**RECEIVED**

AUG 13 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal From Richland County Court of Common Pleas  
The Honorable Kristi F. Curtis, Circuit Court Judge  
The Honorable Daniel Coble, Circuit Court Judge  
Circuit Case No. 2024-CP-40-01737

RECEIVED

AUG 13 2025

SC Court of Appeals

Case No. 2025-000762

Alonzo C. Jeter, III, .....APPELLANT,

V

State of South Carolina; Alan McCrory Wilson;  
Chelsey F. Marto; Joseph Derham Cole; J. Mark  
Hayes, II; Ralph Keith Kelly; Brandy W. McBee;  
Tonnya K. Kohn; Jean Hoefer Toal; Donald D.

Beatty, .....RESPONDENTS.

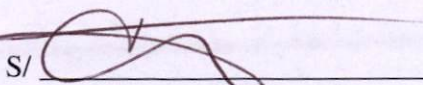
CERTIFICATE OF MAILING AND SERVICE

I, Alonzo C. Jeter, III, an inmate confined in an institution, hereby certify under penalty of perjury under the laws of the United States of America that I have mailed the (1) *Proposed Amended Initial Brief of Appellant* (2) *Return To Motion To Strike (along with attachments)* (3) *and Designation* - to the South Carolina Court of Appeals; and that I have also served a copy of the same on the Defendants; by placing an original and a copy inside of envelopes and by placing the said envelopes in possession of Lee Correctional Institution's mailroom personnel by depositing into the institution's internal mailing system on this 11th day of August, 2025, for mailing via the United States Postal Service, (first-class postage was prepaid either by me or by the institution on my behalf), addressed as follows:

Office of the Court, South Carolina Court of Appeals, Post Office Box 11629, Columbia South Carolina 29211; J. Emory Smith, Jr., General Counsel, Office of the Attorney General, Post Office Box 11549, Columbia South Carolina 29211; L. David Leggett, Assistant Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia South Carolina 29211.

I declare under penalty of perjury that the foregoing is true and correct.  
28 U.S.C. §1746; 18 U.S.C. §1621

*Brown v Powell*, 187 F3d 628 (4<sup>th</sup> Cir. 1999); *Johnson v Fogan*, No. 23-6771 (4<sup>th</sup> Cir. 2023); *Mose v State*, 420 SC 500, 803 SE2d 718 (2017)

S/   
Alonzo C. Jeter, III

August 11th, 2025

**Alonzo C. Jeter, III, #282902**  
*Lee Correctional Institution*  
990 Wisacky Hwy.  
Bishopville, South Carolina

**The Honorable Jenny A Kitchings, Clerk**  
*South Carolina Court of Appeals*  
Post Office Box 11629  
Columbia, South Carolina 29211

**RE: Alonzo C. Jeter, III v State of South Carolina et al - Appellate Case No: 2025-000762**

Dear Honorable Clerk:

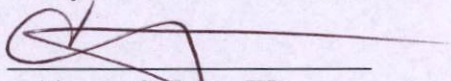
Enclosed for filing, please find the (1) Proposed Amended Initial Brief of Appellant (2) Return To Motion To Strike (along with attachments) (3) Designation (4) and a Certificate of Mailing and Service regarding the same.

Enclosed also, please find an additional copy of these documents along with a self-addressed stamped envelope (SASE).

Please return to me file-stamped copies of these documents by way of the provided SASE.

Thank you for your assistance in this matter.

Sincerely,

  
\_\_\_\_\_  
Alonzo C. Jeter, III

CC: J. Emory Smith  
L. David Leggett  
**FILE**

**RECEIVED**  
AUG 13 2025  
SC Court of Appeals

Alonzo C. Jeter, III, #282902  
Lee Correctional Institution  
990 Wisacky Hwy.  
Bishopville, South Carolina 29010

LEE CI INMATE



US POSTAGE PAID BY PITNEY BOWES

ZIP 29010 \$ 009.45<sup>0</sup>  
02 4W  
0000373846 AUG 12 2025

RECEIVED

AUG 13 2025

SC Court of Appeals

The Honorable Jerry A. Kitzinger, Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211