

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenville County
The Honorable G. Edward Welmaker, Circuit Court Judge
Appellate Case No. 2012-212340

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

v.

KEEON BUTLER,

APPELLANT.

MOTION TO FILE AMENDED INITIAL BRIEF OF RESPONDENT

Appellant filed and served his Initial Brief and Designation of Matter on July 10, 2013. The State filed and served its Initial Brief of Respondent and Designation of Matter on Friday, October 25, 2013. Today undersigned counsel noticed an error in the State's Initial Brief regarding one of the footnotes. Opposing counsel, LaNelle C. DuRant, has consented to the filing of an Amended Initial Brief of Respondent, as evidenced by the attached e-mail correspondence.

WHEREFORE, the State respectfully requests that this Court allow it to file an Amended Initial Brief of Respondent to correct the error.

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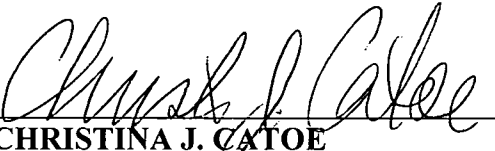
OCT 28 2013

SC Court of Appeals

Respectfully submitted,

ALAN WILSON
Attorney General

CHRISTINA J. CATOE
Assistant Attorney General


CHRISTINA J. CATOE
SC Bar No. 73562

Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737

ATTORNEYS FOR RESPONDENT

October 28, 2013

Christina Catoe

From: LaNelle C. DuRant <ldurant@sccid.sc.gov>
Sent: Monday, October 28, 2013 10:56 AM
To: Christina Catoe
Cc: Paula Murdoch
Subject: RE: Keeon Butler Initial Brief

Christine,

Of course I consent. We all do those things sometimes.

Thanks,

LaNelle

From: Christina Catoe [<mailto:ccatoe@scag.gov>]
Sent: Monday, October 28, 2013 10:34 AM
To: LaNelle C. DuRant
Subject: Keeon Butler Initial Brief

LaNelle,

I filed my initial brief in the Keeon Butler case on Friday. I just noticed an error in it – there is a footnote that I meant to remove but I forgot to do so. Would you consent to me filing an amended initial brief today?

Thanks,
Christie

Christina J. Catoe
Assistant Attorney General
Criminal Appeals Division
South Carolina Attorney General's Office
Post Office Box 11549
Columbia, SC 29211

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
The Honorable G. Edward Welmaker, Circuit Court Judge
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THE STATE OF SOUTH CAROLINA,

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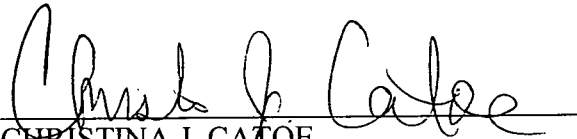
v.

KEEON BUTLER,

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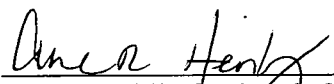
AFFIDAVIT OF SERVICE

The undersigned attorney hereby certifies that the **Motion to File Amended Initial Brief of Respondent** in the above-referenced case has been served upon **LaNelle C. DuRant**, Division of Appellate Defense, South Carolina Commission on Indigent Defense, Post Office Box 11589, Columbia, South Carolina 29211-1589, this **28th** day of **October, 2013**.


CHRISTINA J. CATOE
Assistant Attorney General

Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737

SWORN to before me this 28th day of October, 2013.


Notary Public for South Carolina. 7/15/2017
My Commission Expires: 7/15/2017

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OCT 28 2013

SC Court of Appeals



ALAN WILSON
ATTORNEY GENERAL

October 28, 2013

VIA HAND-DELIVERY

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

RE: State of South Carolina v. Keeon Butler
Appellate Case No. 2012-212340

Dear Ms. Kitchings:

Enclosed please find a **Motion to File Amended Initial Brief of Respondent** and the **Amended Initial Brief of Respondent**, along with the **Designation of Matter** and **Affidavit of Service**, in the above-referenced appeal, which I am serving on opposing counsel today.

Thank you for your attention to this matter, and please do not hesitate to contact me at (803) 734-3713 should there be any questions or concerns.

Sincerely,

Christina J. Cate
Assistant Attorney General
SC Bar No. 73562

CJC/

cc: LaNelle C. DuRant, Esquire
Division of Appellate Defense
Post Office Box 11589
Columbia, SC 29211-1589

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