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**Oct 15 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Lexington County

Honorable Brian M. Gibbons, Circuit Court Judge

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THE STATE,

RESPONDENT,

v.

WILLIAM ARTHUR KELLY,

APPELLANT

APPELLATE CASE NO. 2024-001153

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JOINT MOTION TO AMEND DESIGNATION OF MATTER  
AND MOTION TO AMEND RECORD ON APPEAL

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Counsel for Appellant William Arthur Kelly respectfully requests leave to serve and file an Amended Record on Appeal in this case. In support of this motion, counsel for Appellant would show this Court:

1. The Record on Appeal was filed with this Court on September 26, 2025. Counsel for Appellant submitted the Record on Appeal in good faith that the Record on Appeal included all matter designated by the parties in accordance with Rule 210(c), SCACR.
2. Counsel for Appellant became aware that although the indictments had been designated to be included in the Record on Appeal, they were inadvertently not included. Inasmuch as Rule

210(c), SCACR, requires the Record on Appeal include all matter designated by the parties, it is necessary to amend the Record on Appeal.

3. Opposing counsel, W. Joseph Maye, has graciously consented to this motion and the filing of such an Amended Record on Appeal.

Counsel for Respondent, the State, respectfully requests leave to serve and file an Amended Designation of Matter in this case. In support of this motion, counsel for Respondent would show this Court:

4. Counsel for Respondent cited to pages from State's Exhibit #301 (pages 1601; 1640; 2085-2089; 2095-2096) in his Initial Brief of Respondent but those pages were inadvertently excluded from his designation of matter, as he mistakenly thought that the entire exhibit had been designated by Appellant. Counsel for Respondent is therefore hereby moving to amend his designation of matter to include State's Exhibit #301 (pages 1601; 1640; 2085-2089; 2095-2096) and will file an Amended Designation of Matter to accompany this motion.

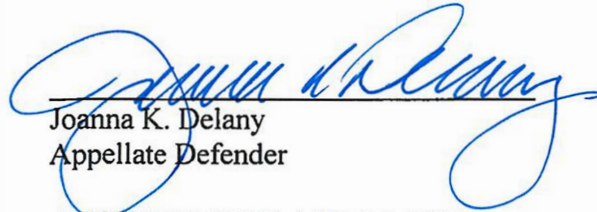
5. Opposing counsel, Joanna K. Delany, has graciously consented to this motion and the filing of such an Amended Designation of Matter.

Counsel for Appellant and counsel for Respondent have agreed to and consent to: the filing of the Joint Motion to Amend the Designation of Matter and Motion to Amend the Record on Appeal; the accompanying filing of the Amended Record on Appeal containing the both the indictments and State's Exhibit #301 (pages 1601; 1640; 2085-2089; 2095-2096); and the accompanying filing of the Amended Designation of Matter.

WHEREFORE, the undersigned counsel would respectfully request that this Court: (1) grant the Motion to Amend the Record on Appeal; (2) grant the Motion to Amend the

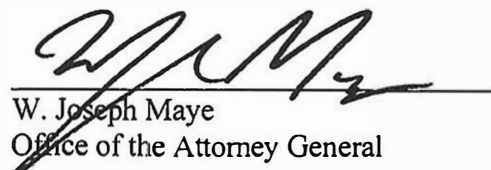
Designation of Matter; (3) accept the Amended Designation of Matter as filed by Respondent with this motion; and (4) accept the Amended Record on Appeal as filed by Appellant with this motion.

Respectfully submitted,



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Joanna K. Delany  
Appellate Defender  
ATTORNEY FOR APPELLANT

Respectfully submitted,



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W. Joseph Maye  
Office of the Attorney General  
ATTORNEY FOR RESPONDENT

October 15, 2025.

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CERTIFICATE OF SERVICE

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Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Joint Motion to Amend the Designation of Matter and Motion to Amend the Record on Appeal and a true copy of the Amended Record on Appeal in the above-referenced case have been served upon W. Joseph Maye, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 15th day of October, 2025.



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Joanna K. Delany  
Appellate Defender

South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211-1589

ATTORNEY FOR APPELLANT