

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

GARY L.L. GRANT #280988
APPELLANT

v.

STATE OF SOUTH CAROLINA

SOUTH CAROLINA COURT OF APPEALS

CA No: _____

MOTION TO ADD ARGUMENT
TO MOTION FOR APPEAL
TO BE GRANTED . . .

RECEIVED

NOV 20 2025

SC Court of Appeals

Now come Appellant GARY L.L. GRANT #280988 Move upon this Honorable Court for a Motion to Add Argument to his Motion for Appeal to be granted . . .

- ① APPELLANT ASSERTS THAT THE STATE TOLD THE COURT THAT THE OTHER CO-DEFENDANT'S WOULD NOT RECEIVE A BETTER DEAL THAN MS. SMITH SEE (TRIAL TRANSCRIPT PG. 111; LINE 7-10) ???
- ② APPELLANT ASSERTS THAT UNDER STATE V. DEAN, 427 S.C. 92 (2019) THE SOLICITOR IN DEAN DID THE SAME AS HEREIN, AND THE SOLICITOR REPEATED IT AGAIN SEE (TRIAL TRANSCRIPT PG. 112; LINE 5-8) AND ACCORDING TO THE COURT RECORDS THIS WAS NOT THE CASE?
- ③ APPELLANT ASSERTS THAT SUPPRESSION OF EVIDENCE BY PROSECUTION THAT IS FAVORABLE TO THE ACCUSED VIOLATES DUE PROCESS WHERE THE EVIDENCE IS MATERIAL EITHER TO GUILT OR TO PUNISHMENT, IRRESPECTIVE OF THE GOOD FAITH OR BAD FAITH OF THE PROSECUTION. SEE DEAN. ID. AT 103?

- ④ FURTHERMORE, SINCE THIS WITNESS AS IN DEM. RELIABILITY OF HIM WAS THE DETERMINING FACTOR FOR APPELLANT GUILT OR INNOCENCE, NON-DISCLOSURE OF EVIDENCE AFFECTING CREDIBILITY FALLS WITHIN THIS GENERAL RULE?
- ⑤ APPELLANT ARGUES KING AND HOLLINS SENTENCE IS AFTER-DISCOVERED EVIDENCE MATERIAL TO HIS GUILT AND PUNISHMENT, KING AND HOLLINS WAS THE ONLY WITNESSES AGAINST APPELLANT AND PRIMARILY CONNECTED APPELLANT TO THE CRIME?
- ⑥ APPELLANT ASSERT THAT HIS CO-DEFENDANT KING AND HOLLINS TESTIMONY WAS ESSENTIAL FOR THE STATE TO CHARGE APPELLANT WITH MURDER, BURGLARY, ARM ROBBERY AND KIDNAPPING, WITHOUT KING AND HOLLINS TESTIMONY LINKING APPELLANT TO THESE CRIMES THE STATE WOULD NOT BE ABLE TO CHARGE APPELLANT?
- ⑦ APPELLANT ASSERT THAT HOLLINS AND KING WERE BOTH GIVEN DEALS, BUT ONLY HOLLINS TESTIFIED AT TRIAL, SEE (TRIAL TRANSCRIPT PG. 397; LINE 1-5) AND THE STATE WAS ADAMANT AT APPELLANT SENTENCING PHASE THAT "THERE WOULD NOT BE NO SWEETHEART DEALS GIVING TO HOLLINS AND KING"?
- ⑧ APPELLANT ASSERT EVEN ON CROSS-EXAMINATION, THIS WITNESS HOLLINS REPEATEDLY STATED ON RECORD THAT THEY WAS NO DEAL GIVEN TO HIM FOR HIS TESTIMONY SEE (TRIAL TRANSCRIPT PG. 419; LINE 18-25; PG 420; LINE 1-25, HOWEVER HOLLINS GOT 18 YEARS FOR VOLUNTARY MANSLAUGHTER AND KING GOT 22 YEARS?
- ⑨ THE FACTS IN THIS CASE ARE DISTINGUISHABLE FROM STATE V. CASKEY, 273 S.C. 325 (1979), STATE ASSURED THE TRIAL COURT MANY TIMES THAT NO DEALS, NEGOTIATIONS, OR AGREEMENTS HAD BEEN OFFERED TO KING OR HOLLINS IN EXCHANGE FOR THEIR TESTIMONY?

- ⑩ APPELLANT ASSERT THAT BEGINNING WITH PRE TRIAL MOTIONS, APPELLANT REQUESTED THAT THE STATE DISCLOSE ANY PLEA, NEGOTIATION OR DEAL WITH DEFENSE. THE TRIAL COURT REITERATED THROUGHOUT TRIAL THAT THE ~~STATE~~ STATE WAS UNDER A CONTINUING DUTY TO DISCLOSE ANY PLEA DEAL OR NEGOTIATIONS?
- ⑪ APPELLANT ASSERT THAT HOLLINS AND KING WERE KEY WITNESS IN THE STATE CASE, DEFENSE WAS UNABLE TO CROSS-EXAMINE HOLLINS ABOUT THE DETAILS OF ANY UNDERSTANDING WITH THE STATE THAT HIS COOPERATION WOULD BE COMMUNICATED TO COURT, THE PLEA DEAL DIDN'T COME OUT UNTIL AFTER TRIAL, THE STATE KEEP SAYING THEY WADN'T NO DEAL?
- ⑫ APPELLANT ASSERT THAT THE EVIDENCE OF KING AND HOLLINS SENTENCE AND WHETHER HE RECEIVED A REDUCTION IN CHARGE AND ANY LENIENCY IN SENTENCING IN EXCHANGE FOR THEIR COOPERATION WAS DISCOVERED AFTER TRIAL AND SENTENCING. ADDITIONALLY, DEFENSE COUNSEL CONSISTENTLY REQUESTED PRE-TRIAL AND DURING TRIAL THAT THE STATE DISCLOSE ANY AGREEMENTS, NEGOTIATIONS, PROMISES, OR DEALS IT HAD WITH KING AND HOLLINS. THEREFORE, DEFENDANT HAS SHOWN THE EVIDENCE WAS DISCOVERED SINCE TRIAL AND IT COULD NOT HAVE BEEN DISCOVERED PRIOR TO THE TRIAL BY THE EXERCISE OF DUE DILIGENCE?
- ⑬ APPELLANT ASSERT THAT JUDGE YOUNG ABUSE HIS DISCRETION BY NOT GRANTING APPELLANT MOTION FOR RULE 6D (B) (2) (3), DUE TO THE FACT THAT IT WAS A GEILIO AND BRAAY VIOLATION AND THE PLEA DEALS THAT'S ATTACHED TO THIS APPEAL ALONG WITH THEY SENTENCING SHEET'S IS A PROVING FACT THAT, THE STATE MADE DEALS WITH BOTH CO-DEFENDANTS IN EXCHANGE FOR THEY TESTIMONY WHICH WAS DISCOVERED AFTER TRIAL? AND WAS NEVER TURN OVER TO THE DEFENSE BEFORE OR DURING TRIAL?

⑭ APPELLANT ASSERT THAT HOLLINS WAS REINDICTED AFTER APPELLANT TRIAL TO LESSER INCLUDED OFFENSES, HOLLINS ORIGINAL INDICTMENT'S NUMBER'S WAS 2007-GS-08-0322, 0323 AND 0324, HOWEVER AFTER APPELLANT TRIAL HOLLINS WAS REINDICTED UNDER, 2008-GS-08-1439 WHICH IS CLEARLY A DEAL, AND WITH THE PLEA DEALS IN BLACK AND WHITE IT'S SELF SHOWS THAT HOLLINS AND KING GOT DEALS FOR THE TESTIMONY'S? SEE SENTENCING SHEET FOR KERRY HOLLINS, WHICH HAVE THE INDICTMENT NUMBER HE WAS REINDICTED UNDER AFTER GIVING HIS TESTIMONY?

⑮ APPELLANT ASSERT THAT HE'S SUBMITTING THE GRAND JURY REPORT WHICH HAVE THE INDICTMENT NUMBER'S KERRY HOLLINS WAS CHARGE WITH BEFORE HE TESTIFIED AGAINST APPELLANT?

⑯ APPELLANT ASSERT THAT JUDGE YOUNG VIOLATED APPELLANT 6TH AMENDMENT RIGHT TO THE U.S. CONSTITUTION, DUE TO THE FACT THAT HE DENY APPELLANT THE RIGHT TO COUNSEL FOR THE HEARING, THE 6TH AMENDMENT TO THE U.S. CONSTITUTION STATE'S AS FELLOW, IN PART: TO BE CONFRONTED WITH THE WITNESSES AGAINST HIM; TO HAVE COMPULSORY PROCESS FOR OBTAINING WITNESSES IN HIS FAVOR, AND TO HAVE THE ASSISTANCE OF COUNSEL FOR HIS DEFENCE?

APPELLANT ASSERT THAT HIS APPEAL SHOULD BE GRANTED ON THIS GROUND DUE TO THE CONSTITUTIONAL VIOLATION?

DATE: NOVEMBER 13TH, 2025

RESPECTFULLY SUBMITTED:
A. J. J. A. I

CONCLUSION

APPELLANT ASSERTS THAT DUE TO THE 6TH AMENDMENT VIOLATION THE BRADY AND GIGLIO VIOLATION APPELLANT ASK THIS COURT TO GRANT HIS APPEAL?

APPELLANT ASSERTS THAT DUE TO JUDGE YOUNG NOT MAKING A RULING ON THE RULE 60(B)(2)+(3) AND MAKING A RULING ON THE RULE 29(B) AFTER IT WAS ESTABLISH IN THE HEARING THAT THE RULE 29(B) WAS AMEND TO A RULE 60(B)(2)+(3) AND THE HEARING WAS ONLY HELD ON THE RULE 60(B)(2)+(3) AND APPELLANT APPEAL SHOULD BE GRANTED ON THE RULE 60(B)(2)+(3)?

APPELLANT PRAY THIS COURT GRANT HIS APPEAL DUE TO THE ERROR OF LAW THAT WAS DONE IN HIS CASE?

EXHIBIT (1)

TRIAL TRANSCRIPT PAGE 419 + 420
FRONT # BACK . . .

EXHIBIT (2)

GRAND JURY REPORT WITH
KERRY HOLLINS ORIGINAL
INDICTMENT NUMBER'S . . .

DEAL
HE GOT
19 YEARS

X

CROSS-EXAMINATION BY MR. BOLUS / KERRY HOLLINS

1 Q Sgt. Merrithew?

2 A Yes, sir.

3 Q And when he came and saw you, you provided him with a
4 statement?

5 A Yes, sir.

6 Q On August the 4th?

7 A Yes, sir.

8 Q And you told him about -- knowledge you had about
9 this?

10 A Yes, sir

11 (Sotto voce discussion between State counsel.)

12 MR. JENNINGS: All right. Mr. Hollins, if you'll
13 answer any questions that the defense attorneys have.

14 THE COURT: Mr. Bolus, you may proceed.

15 (Sotto voce discussion between State counsel.)

16 (Sotto voce discussion between all counsel.)

17 CROSS-EXAMINATION BY MR. BOLUS:

18 Q Mr. Hollins, you're saying that you're testifying
19 today (without any deals) having been made to you?

20 A Yes, sir.

21 Q What, you just had a stroke of bad conscience is --
22 while you're sitting in jail or what? What's the
23 situation?

24 A I don't understand what you're saying.

25 Q Well, you have a lawyer, don't you?

1 A Yes, sir.

2 Q Okay. And you've talked to her before about this
3 case?

4 A Yes, sir.

5 Q You've talked to the prosecutor about the case, right?

6 A Yes, sir.

7 Q And you want us, the jury, and everybody in this
8 courtroom to believe that you're just sitting here doing
9 your good deed as a citizen, without having a deal been
10 made to you?

11 A I ain't got no deal.

12 Q Has a -- hasn't a deal been tentatively offered to you
13 that you would plead to accessory before armed robbery and
14 look at 10 to 30 years?

15 A No, sir.

16 Q Nothing has been said to you by your lawyer or by this
17 prosecutor about that?

18 A No, sir.

19 Q And you're just taking your chances, just testify? Is
20 that what you're saying?

21 A Yes, sir.

22 Q Well, what's motivating you to do it?

23 A Telling the truth.

24 Q You're just telling the truth? You just want to tell
25 the truth? That's it?

GRAND JURY REPORT ON INDICTMENTS

BERKELEY COUNTY

WEDNESDAY, FEBRUARY 7, 2007

131.	2007-GS-08-	0225	Savannah A Soliday
132.	2007-GS-08-	0226	Savannah A Soliday
133.	2007-GS-08-	0184	Kendall Timothy Walker
134.	2007-GS-08-	0142	Ashley Marie Hozier
135.	2007-GS-08-	0235	Landon F Kelly
136.	2007-GS-08-	0148	Matthew D Chaplin
137.	2007-GS-08-	0181	Frances Devries
138.	2007-GS-08-	0320	Kareem King
139.	2007-GS-08-	0341	Kareem King
140.	2007-GS-08-	0327	Kareem King
141.	2007-GS-08-	0326	Kareem King
142.	2007-GS-08-	0325	Kareem King
143.	2007-GS-08-	0321	Kareem King
144.	2007-GS-08-	0346	Kareem King
145.	2007-GS-08-	0344	Kareem King
146.	2007-GS-08-	0322	Kerry Hollins
147.	2007-GS-08-	0323	Kerry Hollins
148.	2007-GS-08-	0324	Kerry Hollins
149.	2007-GS-08-	0328	Marquita C Smith
150.	2007-GS-08-	0329	Marquita C Smith
151.	2007-GS-08-	0330	Marquita C Smith
152.	2007-GS-08-	0345	Jermaine Hartwell
153.	2007-GS-08-	0313	Jermaine Hartwell
154.	2007-GS-08-	0342	Jermaine Hartwell
155.	2007-GS-08-	0311	Jermaine Hartwell
156.	2007-GS-08-	0308	Jermaine Hartwell
157.	2007-GS-08-	0309	Jermaine Hartwell
158.	2007-GS-08-	0310	Jermaine Hartwell
159.	2007-GS-08-	0312	Jermaine Hartwell
160.	2007-GS-08-	0343	Gary Grant
161.	2007-GS-08-	0314	Gary Grant
162.	2007-GS-08-	0347	Gary Grant
163.	2007-GS-08-	0318	Gary Grant
164.	2007-GS-08-	0317	Gary Grant
165.	2007-GS-08-	0316	Gary Grant

WHAT HAPPEN TO THESE CHARGES, ONLY ONE HE PLEA TO!

NONE OF THESE IS THE NEXT MENT NUMBER HE PLEA TO!!!

HE WAS ONLY CONVICTED OF LESSER INCLUDING OFFENSES OF HIS CHARGES! ONLY WAS CONVICTED OF VOLUNTARY MANSLAUGHTER, 1st DEGREE...
3 Co-DEFENDANT CHARGE WITH LESSER CHARGES!!!

3 Co-DEFENDANT
8 Co-DEFENDANT CONVICTED OF ALL CHARGES

CONVICTED OF ALL CHARGES!!!

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

GARY L.L. GRANT # 280988
APPELLANT

v.

STATE OF SOUTH CAROLINA
RESPONDANT

IN THE SOUTH CAROLINA COURT OF APPEALS
C/A No: _____

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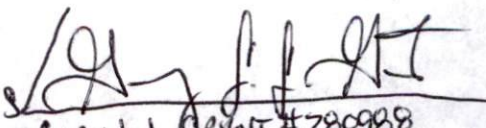
SC Court of Appeals

Proof of Service

I APPELLANT GARY L.L. GRANT # 280988, CLARIFIED THAT I SERVED THIS MOTION TO ADD ARGUMENT TO MOTION FOR APPEAL TO BE GRANTED TO THE SOUTH CAROLINA COURT OF APPEALS AND BERKELEY COUNTY SOLICITOR OFFICE ANN WILLIAMS, BY DEPOSITING SAME IN THE U.S. MAIL WITH SUFFICIENT POSTAGE AFFIXED THERETO AT PERRY CORR. INST. MAIL ROOM ON NOVEMBER 13TH, 2025 TO THE ADDRESS BELOW:

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1720 SENATE ST.
COLUMBIA, S.C. 29201

BERKELEY COUNTY SOLICITOR OFFICE
300 B CALIFORNIA AVE.
MONCK'S CORNER, S.C. 29461


GARY L.L. GRANT # 280988
PCI/C-Y-#15
430 OAK LAWN RA.
PELZER, S.C. 29669
PRO SE

11-13-25

DEAR SOUTH CAROLINA COURT OF APPEAL,

PLEASE CLOCK STAMP AND FILE THIS MOTION AND EXHIBIT AND
RETURN ME BACK A COPIE OF EVERYTHING, THIS IS A ADD
TO THE MOTION FOR APPEAL TO BE GRANTED ...

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NOV 20 2025

SC Court of Appeals

MR. GARY L. L. GRANT # 280988
PCI/C-4 #15
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