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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

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 Hoefer Toal; Donald W.

Beatty, ..... RESPONDENTS.

**SECOND  
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**

**Correspondence - J. Emory Smith to McBride (June 11, 2024)**

**Correspondence – J. Emory Smith to Jeter (June 11, 2024)**

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

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

**Email Correspondence – J. Emory Smith to Judge Curtis (June 11, 2024)**

**Email Correspondence – L. David Leggett to Judge Curtis (June 12, 2024)**

**Correspondence – J. Emory Smith to Judge Curtis (August 15, 2024)**

**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) SCRCF 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), SCRCF)**

*Email Correspondences*

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

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


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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

Kershaw ~~SC~~ Correctional Institution  
~~900 Wilkes Hwy~~ 4848 Goldmine Hwy  
Bishopville, South Carolina ~~29010~~  
Kershaw, 29067

This 13<sup>th</sup> day of November, 2025

STATE OF SOUTH CAROLINA  
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Appeal From Richland County Court of Common Pleas  
The Honorable Kristi F. Curtis, Circuit Court Judge  
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SC Court of Appeals

APPELLATE CASE No. 2025-000762

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

v

State of South Carolina; Alan McCrory Wilson;  
Chekey F. Manto; Joseph Durham Cole; J. Mark  
Hayes, II; Ralph Keith Kelly; Brandy W. McBee;  
Tonnya K. Kohn; Jean Hoeder Toal; Donald W.  
Beatty, ----- RESPONDENTS.

CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have mailed the (1) "Motion For Leave To File Out of Time", (2) "Second Amended Initial Brief of Appellant", and (3) "Second Amended Designation of Matter"; to the SC Court of Appeals and that I have also served copies of the same on the Respondents by placing the same within postage prepaid envelopes and by placing said envelopes in the hands of Kershaw Correctional Institution's mailroom personnel on this 18<sup>th</sup> day of November, 2025, for mailing via the U.S. Mail, addressed as follows: Hon. Jenny A. Kitchings, Clerk, SC Court of Appeals, P.O. Box 11629, Columbia SC 29211; J. Emory Smith, Jr., Office of the Attorney General, P.O. Box 11549, Columbia SC 29211; L. David Leggett, Office of the Attorney General, P.O. Box 11549, Columbia SC 29211. I declare under penalty of perjury that the foregoing is true and correct.

SWORN and subscribed before me  
this \_\_\_\_\_ day of November, 2025  
X. Chambers  
Notary Public for South Carolina  
My Commission Expires: Sept 3, 2034

51  
Alonzo C. Jeter, III

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KERSHAW CI  
MAIL ROOM

November 13, 2025

Alonzo C. Jeter, III, #282902  
Kershaw Correctional Institution  
4848 Goldmine Hwy.  
Kershaw, South Carolina 29067

The Honorable Jenny A. Kitchings  
Clerk, SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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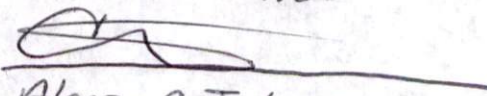
RE: Alonzo C. Jeter, III v State of South Carolina, et al  
Appellate Case No. 2025-000762

Dear Ms. Kitchings:

Enclosed for filing, please find the (1) "Motion For Leave To File Out of Time", (2) "Second Amended Initial Brief of Appellant", (3) "Second Amended Designation of Matter", and a "Certificate of Service" regarding the same.

Please find enclosed also, an additional copy of these documents along with a self-addressed stamped envelope ("SASE"). Please return to me, by way of the provided SASE, file-stamped copies of these said documents.

Thank you for your assistance in this matter.

Sincerely,   
Alonzo C. Jeter, III