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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  
Circuit Court Case No. 2024CP4001737

Honorable Judge Kristi Curtis, Circuit Court Judge

Appellate Case No. 2025-000762

Alonzo 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.

**DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL BY  
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 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 (the “Individual Defendants”) propose the following to be included in the Record on Appeal:

1. Summons and Complaint
2. Individual Defendants’ Motion to Dismiss
3. Individual Defendants’ Motion to Dismiss – Certificate of Service
4. State Defendants’ Motion to Dismiss
5. State Defendants’ Motion to Dismiss – Certificate of Service
6. Response to Individual Defendants’ Motion to Dismiss
7. Response to State Defendants’ Motion to Dismiss
8. Individual Defendants’ Motion to Dismiss – Memorandum in Support

9. Individual Defendants' Motion to Dismiss – Memorandum in Support – Certificate of Service
10. State Defendants' Motion to Dismiss – Memorandum in Support and Exhibits
11. Individual Defendants' Motion to Dismiss – Memorandum in Support – Certificate of Service
12. Order of Ruling
13. Dismissal Order
14. Motion to Reconsider
15. Denial of Motion to Reconsider
16. Emails
  - a. 5/31/25 – Emory to Court, Conflict Notification
  - b. 6/6/24 – Clerk of Court to Emory and David, potential new date
  - c. 6/6/24 – David to Clerk of Court, yes to new date
  - d. 6/6/24 – Emory to Clerk of Court, yes to new date
  - e. 6/10/24 – Clerk of Court to Emory and David, memo deadline
  - f. 6/12/24 – David to Judge, filing MTD Memo
  - g. 6/12/24 – David to SCDC, serving Jeter
  - h. 6/12/24 – SCDC to David, affidavit of service for Jeter

Respectfully Submitted,

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K. KOHN, JEAN HOEFER TOAL, AND  
DONALD BEATTY

FEBRUARY 9, 2026  
COLUMBIA, SOUTH CAROLINA