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Mar 06 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from York County

Honorable William A. McKinnon, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JONATHAN KEITH BASS,

APPELLANT

APPELLATE CASE NO. 2024-000703

MOTION TO AMEND THE DESIGNATION OF MATTER, THE RECORD ON APPEAL, AND
THE FINAL BRIEF OF APPELLANT

Counsel for Jonathan Keith Bass respectfully requests leave to serve and file an Amended Designation of Matter, an Amended Record on Appeal, and an Amended Final Brief of Appellant in this case. In support of this motion, undersigned counsel would show this Court:

1. The Initial Brief of Appellant and Designation of Matter was filed with this Court on August 29, 2025. The undersigned submitted the Designation of Matter in good faith that the Designation of Matter included all matters before the trial court referenced to within the Initial Brief of Appellant. The Record on Appeal was timely filed with this Court on February 13, 2026. The Final Brief of Appellant was timely filed with this Court yesterday, March 5, 2026.
2. The undersigned became aware that the Initial Brief of Appellant filed with this Court on August 29, 2025, and the Final Brief of Appellant filed with this Court yesterday, March 5, 2026,

contained a citation on page 7 to a Motion to Quash filed by defense counsel on February 16, 2024. Undersigned counsel inadvertently failed to include this Motion to Quash in the Designation of Matter filed contemporaneously with the Initial Brief of Appellant. Thus, this Motion to Quash was subsequently omitted from the Record on Appeal and therefore could not be properly cited to in the Final Brief of Appellant.

3. Inasmuch as Rule 209, SCACR, requires the Designation of Matter include all matter designated by appellant for inclusion in the Record on Appeal, undersigned counsel moves to amend the Designation Matter in this case to include the Motion to Quash referenced to on p. 7 of the Initial Brief of Appellant and the Final Brief of Appellant on file with this Court. Undersigned Counsel submits this Amended Designation of Matter contemporaneously with this Motion. Apart from the inclusion of the previously-omitted Motion, this Amended Designation of Matter does not differ from the previously-filed Designation of Matter.

4. Inasmuch as Rule 210, SCACR, requires the Record on Appeal to include all matter designated by each party for inclusion in the Record on Appeal, undersigned counsel moves to amend the Record on Appeal in this case to include the Motion to Quash listed in the Amended Designation of Matter and referenced to on p. 7 of the Final Brief of Appellant. Undersigned counsel submits this Amended Record on Appeal contemporaneously with this Motion. Apart from the inclusion of the previously-omitted motion beginning at page 665 of the Amended Record on Appeal, this Amended Record on Appeal does not differ from the previously-filed Record on Appeal.

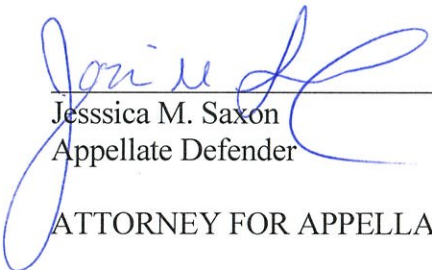
5. Accordingly, it is necessary for appellant to move to amend the Final Brief of Appellant filed with this Court yesterday, March 5, 2026, to include the citation to the Motion to Quash contained in the Amended Record on Appeal. Undersigned counsel submits this Amended Final

Brief of Appellant along with this motion. Apart from the corrected citation, this Amended Final Brief of Appellant does not differ from the Final Brief of Appellant filed with this Court yesterday, March 6, 2026.

4. Undersigned counsel has spoken with opposing counsel, Ambree M. Muller, and opposing counsel has graciously consented to this motion and the filing of the Amended Designation of Matter, the Amended Record on Appeal, and the Amended Final Brief of Appeal.

WHEREFORE, the undersigned counsel would respectfully request that this Court: (1) grant the motion to amend the Designation of Matter, Record on Appeal, and the Final Brief of Appellant and (2) accept the Amended Designation of Matter, the Amended Record on Appeal, and the Amended Final Brief of Appellant as filed with this motion.

Respectfully submitted,



Jessica M. Saxon
Appellate Defender
ATTORNEY FOR APPELLANT

This 6th day of March, 2026

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Appeal from York County

Honorable William A. McKinnon, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

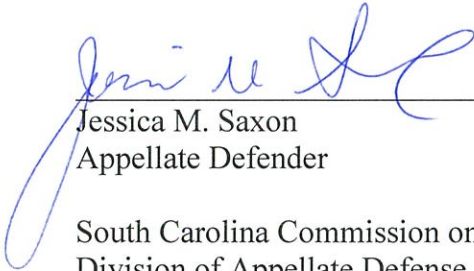
JONATHAN KETIH BASS,

APPELLANT

APPELLATE CASE NO. 2024-001170

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion to Amend the Designation of Matter, Record on Appeal, and Final Brief of Appellant and a true copy of the Amended Designation of Matter, the Amended Record on Appeal, and the Amended Final Brief of Appellant in the above-referenced case have been served upon Ambree M. Muller, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 6th day of March, 2026.



Jessica M. Saxon
Appellate Defender

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

ATTORNEY FOR APPELLANT

Warren, Kaylynn

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Mar 06 2026

SC Court of Appeals

From: Warren, Kaylynn
Sent: Friday, March 6, 2026 11:28 AM
To: ambreemuller@scag.gov
Cc: Saxon, Jessica; Grace Sommer
Subject: 2024-000703 The State v. Jonathan Keith Bass
Attachments: 2024-000703 The State v. Jonathan Keith Bass Motion to Amend the Designation of Matter, the Record on Appeal, and the Final Brief of Appellant.pdf; 2024-000703 The State v. Jonathan Keith Bass Amended Designation of Matter.pdf; 2024-000703 The State v. Jonathan Keith Bass Amended Record on Appeal Volume I.pdf; 2024-000703 The State v. Jonathan Keith Bass Amended Record on Appeal Volume II.pdf; 2024-000703 The State v. Jonathan Keith Bass Amended Final Brief of Appellant.pdf

Good Morning,

Attached for service in the above-referenced case are the Motion to Amend, the Amended Designation of Matter, the Amended two-volume Record on Appeal, and the Amended Final Brief of Appellant which will be filed today, March 6, 2026, with the Court of Appeals via email filing.

Respectfully,

Kaylynn

Kaylynn Warren

Administrative Assistant

South Carolina Commission on Indigent Defense

Division of Appellate Defense

(803) 734-1330