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APR 16 2026

STATE OF SOUTH CAROLINA

In The Court of Appeals

SC Court of Appeals

Appeal from Horry County

Honorable Eugene P. Warr, Jr., Circuit Court Judge

THE STATE,

RESPONDENT,

VS.

RAY EDWARD CHESTNUT,

APPELLANT.

APPELLATE CASE NO. 2025-001447

NOTICE OF SUPPLEMENTAL AUTHORITY
AND PROCEDURAL DEVELOPMENT

COMES NOW the Appellant, Ray Edward Chestnut, and respectfully submits this Notice of Supplemental Authority and Procedural Development for the Court's consideration in connection with the issue raised on appeal concerning the trial court's denial of Appellant's motion to relieve trial counsel.

1. During pre-trial proceedings in the underlying

case, Appellant along with counsel moved to relieve trial counsel due to a breakdown in the attorney-client relationship and asserted conflicts affecting counsel's ability to provide effective representation.

2. During those proceedings, Appellant specifically requested the appointment or substitution of attorney Carla Todd as replacement counsel.

3. The trial court denied Appellant's and trial counsel (Brett Perry) motions to relieve counsel, and the case proceeded to trial with existing counsel.

4. As previously noticed to this court, filed on March 31, 2026, the trial court subsequently granted Appellant's motion to relieve trial counsel following post-trial proceedings.

5. Subsequent to that ruling, attorney Carla Todd has been appointed/substituted as counsel representing Appellant in related pending criminal charges.

6. Appellant submits this procedural development solely to inform the court that the attorney Appellant previously requested as substitute counsel has since been appointed to represent him in pending matters, which bears upon the factual context surrounding the attorney-client conflict raised in Appellant's appeal that the trial court abused its discretion by failing to relieve Brett Perry as counsel.

7. This Notice does not raise any new issues or arguments but is provided to assist the court's consideration of matters already presented in the appellate record and briefing.

WHEREFORE, Appellant respectfully submits this Notice for inclusion in the appellate record and for such consideration as the court deems appropriate.

Respectfully submitted,

/s/ Ray Chestnut
Ray Edward Chestnut

Appellant, Pro Se
SCDC # 304094

Kirkland Correctional Institution
4344 Broad River Road
Columbia, SC 29210

April 10, 2026

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CERTIFICATE OF SERVICE

SC Court of Appeals

This is to certify that a true and correct copy of the foregoing "Notice of Supplemental Authority and Procedural Development" has been served upon the parties addressed below by via U.S. mail with appropriate pre-paid postage on this 10th day of April, 2026

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