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SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

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Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

March 6, 2014

**RECEIVED**

MAR 06 2014

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: State of South Carolina v. Daniel D'Angelo Jackson  
Appellate Case No. 2011-199366

Dear Ms. Kitchings:

I have enclosed an original and six copies of the Motion to File a Supplemental Record on Appeal in the above-captioned case. Thank you for your assistance in this matter.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Sincerely,

Carmen V. Ganjehsani  
Appellate Defender

CVG/mpm

Enclosure

cc: Donald J. Zelenka, Esquire

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Sumter County  
William Jeffrey Young, Circuit Court Judge

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DANIEL D'ANGELO JACKSON,

APPELLANT,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2011-199366

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MOTION TO FILE A  
SUPPLEMENTAL RECORD ON APPEAL

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Counsel for Appellant Daniel D'Angelo Jackson respectfully requests to supplement the Record on Appeal, pursuant to Rule 210(c) and Rule 212(b) of the South Carolina Appellate Court Rules. In support of this motion, Counsel requests to file a Supplemental Record on Appeal based on the following grounds:

- (1) On February 21, 2013, Counsel served and filed the Initial Brief of Appellant and Designation of Matter to be included in the Record on Appeal.
- (2) On January 31, 2014, Respondent served and filed the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal.
- (3) In preparing to file the Record on Appeal, Counsel found that the Court's exhibit #9, was inadvertently omitted from the Record on Appeal.

- (4) Counsel has prepared a Supplemental Record on Appeal to include the omitted page listed above.
- (5) Therefore, Counsel moves to supplement the Record on Appeal in good faith and not for purpose of delay because Court's exhibit #9 is necessary and useful to this Court.

WHEREFORE, the undersigned counsel respectfully requests this Court to allow the Record on Appeal to be further supplemented by including Court's exhibit #9 based on the above circumstances.

Respectfully submitted,



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Carmen V. Ganjehsani  
Appellate Defender

Attorney for Appellant

This 6th day of March, 2014

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MAR 06 2014

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Sumter County  
William Jeffrey Young, Circuit Court Judge  
\_\_\_\_\_

DANIEL D'ANGELO JACKSON,

APPELLANT,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

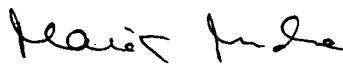
The undersigned attorney hereby certifies that a true copy of the Motion to File a Supplemental Record on Appeal in the above referenced case has been served upon opposing counsel, Donald J. Zelenka, Esquire at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 6th day of March, 2014.



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Carmen V. Ganjehsani  
Appellate Defender

Attorney for Appellant

SUBSCRIBED AND SWORN TO before me  
this 6th day of March, 2014.

 (L.S.)

\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: July 3, 2023.