

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Sumter County

William Jeffrey Young, Circuit Court Judge

Appellate Case No. 2011-199366 – Court of Appeals

THE STATE,

Respondent,

v.

DANIEL D'ANGELO JACKSON,

Appellant

**RESPONDENT'S MOTION TO FILE A SUPPLEMENTAL RECORD ON
APPEAL TO INCLUDE MATTERS MISSING FROM THE RECORD ON
APPEAL SET FORTH IN RESPONDENT'S DESIGNATION OF
MATTER**

The Respondent State of South Carolina, through the Attorney General hereby moves to allow the filing of A Supplemental Record on Appeal to include matters set forth in the Respondent's Designation of Matter but not included in the Record on Appeal received by Respondent and filed in this Court. In the Respondent's Designation of Matter filed January 31, 2014, Respondent included as item one for designation under Motions and Orders: "Pretrial Motions."

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SC Court of Appeals

Upon review of the Record on Appeal, in preparation for the filing of the Final Brief of Respondent, no pretrial motions were included in the Record on Appeal. Consistent with the request for items designated in Respondent's Designation of Matter, Respondent below signed counsel has prepared a Supplemental Record on Appeal including the following material for the Court's consideration:

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| Motion for Severance, filed April 29, 2011..... | 1 |
| Motion for Supplemental Brady and Discovery, filed May 13, 2011..... | 2 |
| Motion for Dismissal and Other Relief, filed May 25, 2011..... | 9 |
| Motion in Limine to Suppress Statements (Canty), filed June 2, 2011..... | 12 |
| Motion for Dismissal, Continuance, and Other Relief, filed June 2, 2011..... | 17 |
| Motion for Continuance (Canty), filed June 6, 2011..... | 21 |
| Request and Motion Under Rule 5 for Discovery, filed August 8, 2011..... | 23 |
| Supplemental Motion for Dismissal, Continuance and Other Relief, filed June 3, 2011..... | 25 |
| Motion for Reconsideration, filed August 16, 2011..... | 27 |
| Order Denying Motion for Reconsideration, filed August 24, 2011..... | 32 |

Supplemental Record on Appeal, p. 1-33.

A.

Respondent have consulted with opposing counsel, Carmen Ganjehsani, who has no objection to this correction of the record.

B.

WHEREFORE Respondent requests that this Court allow inclusion of this Supplemental Record on Appeal. In order to expedite the process, Respondent has prepared and is including sufficient copies with this filing.

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83.

Respectfully Submitted,

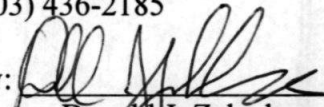
ALAN WILSON
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By:

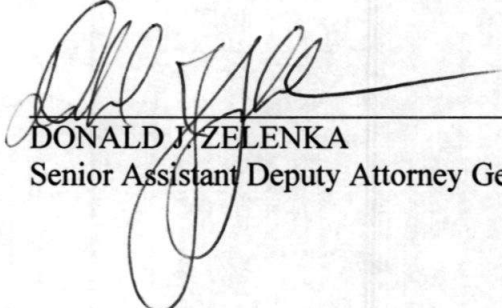

Donald J. Zelenka

ATTORNEYS FOR RESPONDENT

March 26, 2014

CERTIFICATE OF SERVICE

I, **Donald J. Zelenka**, hereby certify that I have served the RESPONDENT'S MOTION TO FILE A SUPPLEMENTAL RECORD ON APPEAL TO INCLUDE MATTERS MISSING FROM THE RECORD ON APPEAL SET FORTH IN RESPONDENT'S DESIGNATION OF MATTER in the foregoing action by depositing copies in the United States Mail, postage prepaid, to Carmen V. Ganjehsani Appellant Defender, Division of Appellate Defense, P. O. Box 11589, Columbia, SC 29211 this 26th day of March, 2014.



DONALD J. ZELENKA
Senior Assistant Deputy Attorney General



ALAN WILSON
ATTORNEY GENERAL

March 26, 2014

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SC Court of Appeals

Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

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

Dear Ms. Kitchings:

Enclosed please find **Respondent's Motion to File a Supplemental Record on Appeal to Include Matters Missing From the Record on Appeal Set Forth in Respondent's Designation of Matter** in the above-referenced case. Also, enclosed is the original and one (1) copy of the **Supplemental Record on Appeal** in this matter. By copy of this letter, I am serving opposing counsel with same.

Sincerely,

Lonetta B. Brawley
Legal Assistant to Donald J. Zelenka
Senior Assistant Deputy Attorney General

/lbb
Enclosures

cc: Carmen V. Ganjehsani, Esquire