

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-CP-08-2002

The State,

Respondent,

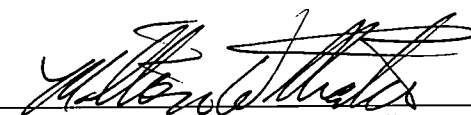
v.

Jami Morse,

Appellant.

**MOTION TO AMEND INITIAL BRIEF OF APPELLANT AND RECORD
ON APPEAL**

Appellant herein moves to amend her Initial Brief and her Record on Appeal. The purpose of this Motion is to correct errors in the original Initial Brief and Record on Appeal. These amendments do not add to or alter Appellant's substantive argument, and therefore would not cause prejudice to the Respondent.


Milton D. Stratos (SC Bar #7972)
Attorney for Appellant
1041 Johnnie Dodds Blvd., Suite 14A
Mt. Pleasant, South Carolina 29464
(843) 216-7739 [T]; (843) 216-0804 [F]
milton@stratoslaw.com

Other Counsel of Record:

Catherine Fant
Assistant General Counsel
SC Department of Public Safety
P.O. Box 1993
Blythewood, SC 29016
(803)896-9664
Attorney for Respondent

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MAY 06 2014

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
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APPEAL FROM BERKELEY COUNTY
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R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-CP-08-2002

The State,

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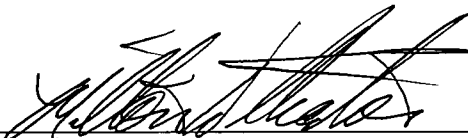
v.

Jami Morse,

Appellant.

PROOF OF SERVICE

I certify that I have served a copy of the *Motion to Amend Initial Brief of Appellant and Record on Appeal, Amended Brief of Appellant*, and the Appellant's *Amended Record on Appeal* on the Respondent's attorney. Service was completed by depositing copies of said documents in the United States Mail, with sufficient postage affixed thereto, on this the 2nd day of May 2014, addressed as such: Ms. Catherine Fant, Esq., Assistant General Counsel, SC Department of Public Safety, P.O. Box 1993, Blythewood, SC 29016.


Milton D. Stratos (SC Bar #7972)
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Attorney for Appellant

Other Counsel of Record:
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SC Department of Public Safety
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(803)896-9664
Attorney for Respondent

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SC Court of Appeals

May 2, 2014

VIA US MAIL

The South Carolina Court of Appeals
Attn: Ms. Jenny Abbot Kitchings, Clerk
Post Office Box 11629
Columbia, SC 29211



Re: The State v. Jami Morse
Case No.: 2013-002734

To Whom It May Concern,

Enclosed, in accordance with the Court's correspondence dated April 24, 2014 (attached), please find Mr. Stratos' *Proof of Service, Motion to Amend Initial Brief of Appellant and Record on Appeal, Amended Brief of Appellant, and Amended Record on Appeal*. As this is an appeal of a criminal matter, a filing fee is not required. I have also enclosed a prepaid envelope so that the filed documents may be returned to our office.

Please feel free to contact me with any questions or concerns you may have.

With kindest regards,

Malena A. Dinwoodie
Assisting
Milton D. Stratos

MDS/mad

cc: Ms. Catherine Fant, Esq.

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SC Court of Appeals



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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April 24, 2014

Mr. Milton Demetrios Stratos, Esquire
1041 Johnnie Dodds Blvd.
Ste. 14-A
Mt. Pleasant SC 29464

Re: The State v. Jami Morse
Appellate Case No. 2013-002734

Dear Counsel:

Upon reviewing your amended initial brief of appellant and designation of matter, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- A motion to amend the initial brief of appellant and designation of matter must be provided with the amended documents.

Very truly yours,

V. Claire Allen Deputy

CLERK

cc: Catherine Fant, Esquire
Marcus Keith Gore, Esquire

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SC Court of Appeals