

STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

NOV 24 2014

S.C. Supreme Court

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

The Honorable William H. Seals Jr., Circuit Court Judge

Appellate Case No. 2014-000068

Anthony Tommy Wilson, Petitioner,

v.

State of South Carolina, Respondent.

MOTION TO SUPPLEMENT APPENDIX

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, counsel for Respondent moves to supplement the Appendix in this case. In support of this motion, Respondent would present the following facts:

1. Petitioner filed the Petition for Writ of Certiorari and Appendix in this matter on August 7, 2014.
2. This Court has granted Respondent's requests for extensions of time in which to file the Return to Petition for Writ of Certiorari. The Return is due today, November 24, 2014. Respondent is filing the Return contemporaneously with this motion.
3. In reviewing this case, Respondent notes the Appendix does not contain the

Petitioner's guilty plea affidavit. This affidavit was entered as a court's exhibit at Petitioner's plea hearing. (App. p. 2, line 16). As part of the Florence County Clerk of Court's records, the affidavit was before the post-conviction relief judge at the evidentiary hearing. (App. p. 82). The affidavit was also referenced by a witness at the evidentiary hearing. (App. p. 65, line 14-p. 66, line 5).

4. Inasmuch as the plea affidavit is a relevant and pertinent part of the lower court's record and should be included in the Appendix pursuant to Rule 243(f), SCACR, Respondent moves to include the same in a Supplemental Appendix. A copy of the proposed Supplemental Appendix is attached to this motion and incorporated herein.

WHEREFORE, as the Appendix is incomplete, counsel for Respondent requests this Court: (1) grant the motion to supplement the Appendix and (2) accept the attached Supplemental Appendix as filed.

Respectfully submitted,

ALAN WILSON
Attorney General

JOSHUA L. THOMAS
Assistant Attorney General
S.C. Bar No. 100777

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3737

By: 

ATTORNEYS FOR RESPONDENT

November 24, 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County

The Honorable William H. Seals, Jr., Circuit Court Judge

ANTHONY TOMMY WILSON,

Petitioner,

STATE OF SOUTH CAROLINA

Respondent.

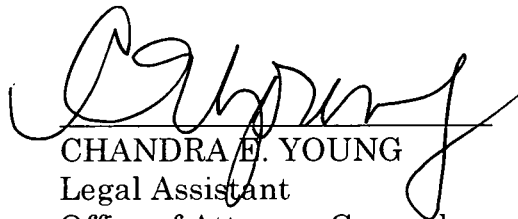
PROOF OF SERVICE

I, CHANDRA E. YOUNG, certify that I have served the Motion to Supplemental Appendix and Supplemental Appendix on opposing counsel by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

Carmen V. Ganjehsani, Esquire
South Carolina Office of Indigent Defense
PO Box 11589
Columbia, South Carolina 29211

I further certify that all parties required by Rule to be served have been served.

This 24TH day of November, 2014.



CHANDRA E. YOUNG
Legal Assistant
Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737



ALAN WILSON
ATTORNEY GENERAL

November 24, 2014

RECEIVED

NOV 24 2014

S.C. Supreme Court

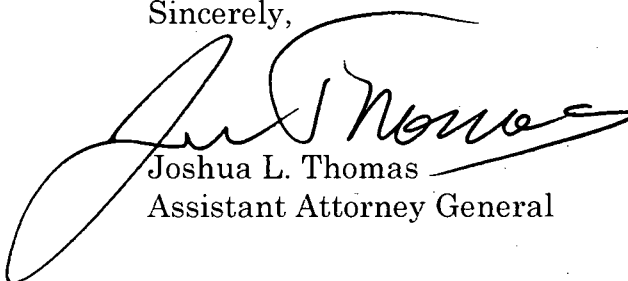
The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

**RE: Anthony Tommy Wilson v. State of South Carolina
2014-000068**

Dear Mr. Shearouse:

I am enclosing the original and six (6) copies of the Motion to Supplemental Appendix and original and one (1) copy of the Supplemental Appendix in the above case.

Sincerely,



Joshua L. Thomas
Assistant Attorney General

JLT:cey
Enclosures

cc: Carmen V. Ganjehsani, Esquire