

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Horry County

S.C. Supreme Court

J. Cordell Maddox, Jr., Circuit Court Judge

MICHAEL ADAM BAILEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000651

MOTION TO SUPPLEMENT
THE APPENDIX

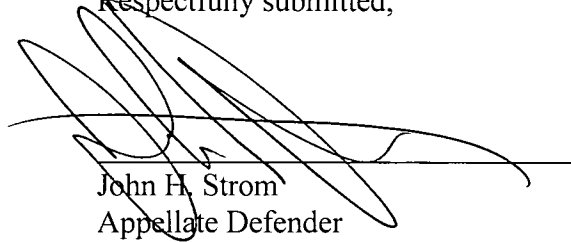
Counsel for Michael Bailey respectfully requests to supplement the Appendix, pursuant to Rules 243(f) of the South Carolina Appellate Court Rules. In support of this motion counsel shows the following:

1. The petition for writ of certiorari and accompanying appendix was served and filed on January 28, 2015.
2. Due to an oversight, the trial transcript of Petitioner's sentencing hearing, held on August 16, 2007, was omitted from the appendix.
3. The omission of the sentencing hearing transcript was a mistake and counsel for Petitioner has prepared a supplemental appendix which is being filed simultaneously with this motion.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office had been informed of and consented to this request.

WHEREFORE, the undersigned counsel respectfully requests this Court to allow the appendix to be supplemented to include the sentencing hearing transcript in Petitioner's case based on the above circumstances.

Respectfully submitted,



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER

This 23rd day of February, 2015.

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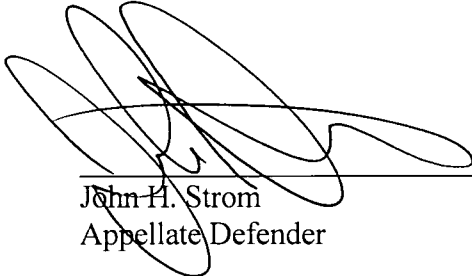
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000651

CERTIFICATE OF SERVICE

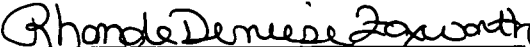
I certify that a true copy of the motion to supplement the appendix, together with the supplemental appendix, in this case have been served on Joshua L. Thomas, Esquire at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 23rd day of February, 2015.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 23rd day
of February, 2015.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 17, 2021.