

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
\_\_\_\_\_  
Appeal from Chesterfield County  
Paul M. Burch, Circuit Court Judge  
\_\_\_\_\_

RECEIVED  
APR 24 2015  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JULIUS CURRY,

APPELLANT

APPELLATE CASE NO. 2014-000569  
\_\_\_\_\_

**Motion to File an Amended Initial Brief**  
\_\_\_\_\_

On November 12, 2014, Appellant filed the initial brief and designation of matter. The issue raised in the initial brief of Appellant is whether the trial judge erred in allowing the State to publish, over objection, recorded phone calls between Appellant, while he was in jail, and his then girlfriend, when the State did not introduce the recordings in evidence and the judge failed to determine if any probative value of the recordings was far out weighed by the prejudicial impact.

On January 26, 2015, the State moved to hold the appeal in abeyance in order to allow the State to obtain the content of the recordings that were played for the jury, over objection, but never admitted in evidence. Because the recordings were never admitted in evidence, the judge never made a finding as to admissibility. On February 6, 2015,

Appellant filed a return to the State's motion to hold the case in abeyance. Appellant asserted that the appeal could be decided without the content of the recordings because the issue on appeal involved the judge's failure to making findings in regard to admissibility of the recordings. Appellant submitted, however, that if the Court finds that the content of the recording is necessary for a determination of the issue on direct appeal, Appellant would not oppose the appeal being placed in abeyance in order for the State to obtain a transcript of the recording prepared by the original court reporter from her tapes from the trial. A copy of both the motion and the return are attached.

On March 12, 2015, while the motion to hold the case in abeyance was still pending, the State filed a motion to remand for reconstruction of the record. The court reporter did not record the recordings that were played for the jury but not admitted in evidence and the original recordings from the jail could not be retrieved. The State moved to reconstruct the recordings that were played for the jury. A copy of the motion is attached.

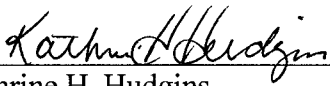
On March 15, 2015, Appellant filed a return to the motion to remand for reconstruction. Appellant opposed the motion to remand for reconstruction based on the fact that the issue on appeal could be decided without the content of the recordings. A copy of the return is attached. On March 30, 2015, this Court granted the State's motion to remand.

On April 8, 2015, a reconstruction hearing was held before the Honorable Paul M. Burch, the trial judge. Matthew Swilley represented Appellant at the hearing. Kenard Redmond represented the State. Appellant objected to the reconstruction hearing. On

April 21, 2015, appellate counsel received a copy of the transcript from the reconstruction hearing.

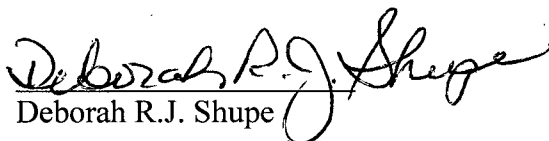
Based on receipt of the reconstruction hearing transcript, Appellant respectfully moves for leave to file an amended initial brief. Assistant Attorney General Deborah R.J. Shupe, as evidenced by her signature below, consents to the motion to file an amended initial brief.

Respectfully submitted,

  
\_\_\_\_\_  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR APPELLANT

I consent:

  
Deborah R.J. Shupe

ATTORNEY FOR RESPONDENT

This 24th day of April, 2015

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APR 24 2015

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

SC Court of Appeals

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Appeal From Chesterfield County  
The Honorable Paul M. Burch, Circuit Court Judge  
Appellate Case No. 2014-000569

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THE STATE,

Respondent,

v.

JULIUS CURRY,

Appellant.

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MOTION TO HOLD APPEAL IN ABEYANCE

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Respondent State of South Carolina hereby moves to hold the deadlines in the above captioned matter in abeyance pending receipt of additional portions of the trial transcript. The Initial Brief of Respondent is currently due on January 28, 2015. The basis for Respondent's Motion is set forth below.

The issue on appeal involves the admissibility of jail phone call recordings that were played for the jury. The trial transcript provided merely states "an audio recording was played for the jury in open Court" on three occasions, and does not contain transcriptions of the recordings.

Appellant asserts this Court cannot determine if the recordings had any probative value or were unduly prejudicial because the recordings are not in evidence. The State is

currently attempting to verify that the full content of the recordings is contained in the court reporter's audiotape of the trial proceedings, and if so, to obtain a transcript of the recordings and/or a copy of the audiotape for submission to the Court. The undersigned has also contacted the Solicitor's Office to assist in obtaining this information.

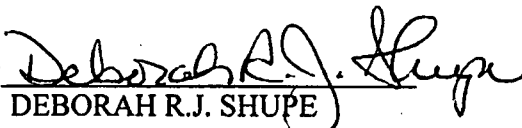
Since the sole issue on appeal relates to the recordings, the State is undertaking reasonable efforts to obtain the content of those recordings for the Court's consideration in this case. Accordingly, Respondent moves to hold all deadlines in this appeal in abeyance pending receipt of the additional portions of the trial transcript and/or a copy of the court reporter's audiotape of the trial proceedings. The undersigned certifies she informed opposing counsel of this motion by telephone and email.

Respectfully submitted,

ALAN WILSON  
Attorney General

DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General  
SC Bar No. 5098

WILLIAM B. ROGERS, JR.  
Solicitor, Fourth Judicial Circuit

By:   
DEBORAH R.J. SHUPE

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

January 26, 2015

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

APR 24 2015

Appeal From Chesterfield County  
The Honorable Paul M. Burch, Circuit Court Judge  
Appellate Case No. 2014-000569

SC Court of Appeals

THE STATE,

Respondent,

v.

JULIUS CURRY,

Appellant.

PROOF OF SERVICE

I, Sally B. Ellison, certify I served the Motion to Hold Appeal in Abeyance on Appellant by depositing a copy in the United States mail, postage prepaid, addressed to:

Kathrine H. Hudgins  
Assistant Appellate Defender  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211-1589

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

This 26th day of January, 2015.



SALLY B. ELLISON  
Administrative Assistant

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

COPY

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

RECEIVED

APR 24 2015

Appeal from Chesterfield County

Paul M. Burch, Circuit Court Judge

SC Court of Appeals

RECEIVED

FEB 06 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JULIUS CURRY,

APPELLANT

APPELLATE CASE NO. 2014-000569

**Return to State's Motion to Hold Appeal in Abeyance**

RECEIVED  
FEB - 6 2015  
SC OFFICE OF  
APPELLATE DEFENSE


The State moves to hold the appeal in abeyance in order to obtain a transcript of the tape recording of a phone call Appellant made from the jail. The recording was played for the jury but was not admitted in evidence and not transcribed by the court reporter. The issue raised in the initial brief of Appellant is whether the trial judge erred in allowing the State to publish, over objection, recorded phone calls between Appellant, while he was in jail, and his then girlfriend, when the State did not introduce the recording in evidence and the judge failed to determine if any probative value of the recording was far out weighed by the prejudicial impact. The issue on appeal involves, not simply the admission of the recording, but the trial judge's failure to make any findings pursuant to Rule 403 before allowing the State to publish the recording. Appellant submits that the

issue presented on appeal can be decided without the content of the recording of the jail phone call. Regardless of the content, the judge failed to make the required findings. This Court cannot review the trial judge's determination that any probative value of the recordings was far outweighed by the prejudicial impact because the trial judge failed to make any determination as to probative value and prejudicial impact.

If this Court finds that the content of the recording is necessary for a determination of the issue on direct appeal, Appellant does not oppose the appeal being placed in abeyance in order for the State to obtain a transcript of the recording prepared by the original court reporter from her tapes from the trial. Counsel respectfully asks that opposing counsel request, in writing and in a timely manner, the transcript from the court reporter consistent with the intent of Rule 207 SCACR. As the recording was not introduced in evidence, Appellant opposes the recording being submitted to this Court through any means other than a transcription from the court reporter's original audio tape from the trial.

Additionally, if a transcript of the recording is obtained and made a part of the record in this direct appeal, counsel moves for leave, in the form of the reply brief, to address issues raised by the content of the recording.

Respectfully submitted,

  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR APPELLANT

This 6th day of February, 2015.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Chesterfield County

Paul M. Burch, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

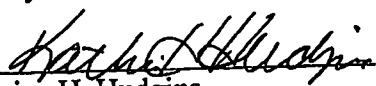
JULIUS CURRY,

APPELLANT

APPELLATE CASE NO. 2014-000569

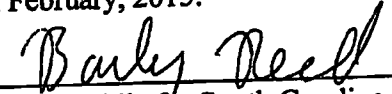
CERTIFICATE OF SERVICE

I certify that a true copy of the Return to State's motion to hold appeal in abeyance in this case have been served on Deborah Shupe, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 6<sup>th</sup> day of February, 2015.

  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR APPELLANT

SWORN TO BEFORE ME this 6<sup>th</sup> day  
of February, 2015.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: October 24, 2021.

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

---

Appeal From Chesterfield County  
The Honorable Paul M. Burch, Circuit Court Judge  
Appellate Case No. 2014-000569

---

THE STATE,

Respondent,

v.

JULIUS CURRY,

Appellant.

---

MOTION TO REMAND FOR RECONSTRUCTION OF THE RECORD

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Respondent State of South Carolina previously moved to hold the deadlines in the above captioned matter in abeyance pending receipt of additional portions of the trial transcript. That Motion is still pending. Respondent now moves to remand this matter to the circuit court for reconstruction of those portions, and renews its request the matter be held in abeyance. The basis for Respondent's Motion is set forth below.

The issue on appeal involves the admissibility of jail phone call recordings played for the jury. The trial transcript merely noted the recordings were played, and did not include transcriptions of the recordings. The State has diligently attempted to obtain transcription of the recordings, but counsel has now learned the court reporter did not leave her recording equipment on while the recordings were played in court, and the

original recordings can no longer be retrieved in any way from the company that operates the jail's recording system.

Appellant asserts this Court cannot determine if the recordings had any probative value or were unduly prejudicial because the recordings are not "in evidence." The transcript indicates three recordings were played in court before the jury. As to each recording, the transcript states "an audio recording was played for the jury in open court." (Trial Transcript, pp. 161-165, attached hereto as Exhibit A).

During Appellant's closing argument, counsel referenced the recordings and told the jury "if you want to listen to them again the court reporter has got them," and "[t]hat testimony is in evidence." Counsel then discussed the substance of the recordings, including which party did most of the talking during the calls. (Trial Transcript, p. 217, attached hereto as Exhibit B).

The State also discussed the recordings during closing, and told the jury "the recording is in evidence and can be replayed or read back." (Trial Transcript, pp. 236-237, attached hereto as Exhibit C). In short, the transcript makes it clear both Appellant and the State believed the court reporter captured the recordings as they were played in court, and therefore, the recordings were part of the record before the circuit court and available for the jury's consideration.

Since the sole issue on appeal relates to the recordings, the State submits reconstructing the substance of the recordings played in open court is mandated in order for the appellate courts to meaningfully consider the merits of Appellant's arguments. Accordingly, Respondent moves to remand the case to the circuit court for appropriate proceedings to reconstruct those portions of the record. Respondent further renews its

motion to hold all deadlines in this appeal in abeyance pending resolution of this issue.

The undersigned certifies she informed opposing counsel of this motion by email.

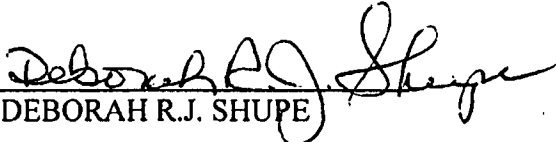
Respectfully submitted,

ALAN WILSON  
Attorney General

DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General  
SC Bar No. 5098

WILLIAM B. ROGERS, JR.  
Solicitor, Fourth Judicial Circuit

By:

  
DEBORAH R.J. SHUPE

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

March 12, 2015

1 THE COURT: Okay.

2 (WHEREUPON, State's Exhibit One played in open Court  
3 for the jury.)

4 BY MR. REDMOND:

5 Q. It that the end of the subsequent portion?

6 A. Yes.

7 Q. Okay. And, again, was this interview done at the  
8 hospital?

9 A. It was done at the hospital, yes.

10 Q. Now, we also talked about some calls from the jail,  
11 and let me just ask you some foundational questions about  
12 how that process works. Now, a phone calls being made out  
13 of the jail by inmates, can they be recorded?

14 A. They are recorded.

15 Q. They are recorded?

16 A. Yes. Yes.

17 Q. And how does that process work?

18 A. What they do is that buy phone cards from the County  
19 Jail and they type in a code that's on the back of the  
20 phone card and they make the phone call.

21 Q. Excuse me. And if, with those calls being recorded,  
22 were you able to access any calls recorded by the  
23 defendant?

24 A. Yes, we accessed several calls from him.

25 Q. And I think at the beginning of each of those calls

1 is there a warning about the call being monitored or  
2 recorded?

3 A. That is correct.

4 Q. Okay. Now, again, did you listen to any phone calls  
5 regarding the defendant?

6 A. Yes, I did.

7 Q. Okay. And there are, I think, four particular areas  
8 that we're going to want to get into regarding those  
9 times. But before I have you step down and discuss those  
10 matters we -- you are using your laptop to hear these; is  
11 that correct?

12 A. That is correct. That's my Department issued laptop.

13 Q. Okay. And I don't actually have a disk drive or a  
14 C.D. that I can actually put into the computer or what  
15 not; is that correct?

16 A. That is correct.

17 Q. And I think in talking with you you were not able to  
18 do it in that form based upon the software. But, again,  
19 is this on your computer accurate as to what was produced  
20 by the jail?

21 A. Yes, is that correct. I have a website that I go to  
22 that is secured. That's what we use. I have my own  
23 issued user name and my own password that I can only get  
24 into that. Anybody in my unit, all my detectives can get  
25 into it. They are issued user names and passwords.

1 Q. All right.

2 MR. REDMOND: If I could at this point, Your Honor,  
3 with the Court's permission I would ask that Lieutenant  
4 Jordan step down and publish this for the jury at this  
5 time?

6 MR. SWILLEY: Your Honor, I'm going to object under  
7 my previous objections of Rule 403 as well as the Rule of  
8 Hearsay in regards to the other parties speaking on these  
9 recording. Please note my objection.

10 MR. REDMOND: And, Your Honor, we would simply say  
11 that it is relevant because the portions that we are going  
12 to be talking about address calls made to Ms. Marshall  
13 Wright whose still here in the courtroom in reference to  
14 this case and her testimony or non-testimony regarding  
15 this case. So we would assert that they are very relevant  
16 in this particular matter.

17 THE COURT: All right. Objection is overruled. Go  
18 ahead.

19 MR. REDMOND: Thank you, Your Honor. This first  
20 call, Your Honor, was made on the 13th of September of  
21 2013. And, Your Honor, if you will indulge us. Because  
22 of the nature of this system we have to physically work it  
23 up to that spot. We ask the Court and the jury's  
24 patience.

25 MR. SWILLEY: And, Your Honor, to preserve the record

1 I would also object to the fact nothing is in evidence at  
2 this point of the actual recording as well. I've made  
3 that objection as well.

4 THE COURT: All right. Noted. I overrule it. Since  
5 there is no proffer here if I find a problem pops up I  
6 will have to step in. There could be ramifications.

7 MR. REDMOND: We are trying to guard against that so  
8 we sort of set the parameters as it relates to admissible  
9 evidence, Your Honor. Your Honor, what we are going to  
10 do, just for the record, is play the first part where it  
11 talks about the admonition about the phone call being  
12 recorded.

13 (WHEREUPON, an audio recording was played for the  
14 jury in open Court.)

15 MR. REDMOND: That concludes that call. The next  
16 call is a little bit further and we're going to move a  
17 little further on, Your Honor. While he's doing that,  
18 Your Honor, if I can just inquire to make sure that the  
19 jurors can actually hear what's going on. Judge, may we  
20 approach, please?

21 (WHEREUPON, a bench conference was held off the  
22 record in the presence of the jury, but out of the  
23 hearing of the jury.)

24 MR. REDMOND: The next call, Your Honor, I think is  
25 on the 17th. It is on the 17th of September.

1 (WHEREUPON, an audio recording was played for the  
2 jury in open Court.)

3 MR. REDMOND: And the last call, Your Honor, is on  
4 the 21st of September.

5 (WHEREUPON, an audio recording was played for the  
6 jury in open Court.)

7 MR. REDMOND: And, Your Honor, that would conclude  
8 all of these jail recordings. And at this point, Your  
9 Honor, I don't have anything further for Lieutenant  
10 Jordan.

11 BY MR. REDMOND:

12 Q. Please answer any questions Mr. Swilley may have for  
13 you.

14 MR. SWILLEY: No cross-examination, Your Honor.

15 THE COURT: You may step down.

16 MR. REDMOND: Beg the Court's indulgence just one  
17 moment. Your Honor, with that the State would  
18 respectfully rest its case.

19 COLLOQUY

20 THE COURT: Ladies and gentlemen of the jury, if  
21 y'all will step back to your jury room, please I have to  
22 take up some matters of law.

23 (WHEREUPON, the jury panel was excused from the  
24 courtroom at 3:25 p.m.)

25 THE COURT: Anything for the record.

# **EXHIBIT A**

# **EXHIBIT B**

1 prove. Okay. Think about it. When you go through  
2 everything that was said think about why it's being said,  
3 why the question was asked and what they are trying to  
4 prove. What are they trying to prove? Are they trying to  
5 prove something in the indictment or trying to make  
6 something appear a certain way?

7 The thing that comes to mind is known as jail calls.  
8 If we go back and talk about those jail calls, and you  
9 will have -- if you want to listen to them again the court  
10 reporter has got them. That testimony is in evidence. If  
11 you want to listen to those jail calls who was talking the  
12 most on those jail calls? Whose voice did you hear mostly  
13 on those jail calls? It's Marshell. He is talking to  
14 Marshell who at the time was his girlfriend, who  
15 apparently doesn't want him to be prosecuted.

16 He was trying to tell her, "Look, just do what you  
17 got to do. Get me out of here. I don't like it." The  
18 reason that that was put before you is to make Julius look  
19 bad. Not to make him look guilty, but to make him look  
20 bad. Okay. There are some things that are just going to  
21 make you look bad like the fact that you were using drugs  
22 and drinking that day. That makes him look bad, but that  
23 doesn't mean -- that doesn't have any bearing on whether  
24 or not he is guilty of anything. It just makes him look  
25 bad. That's some of the things I want you to consider

# **EXHIBIT C**

1           Well, let's look at that for a minute. When you talk  
2 about credibility issues, we get to the jail calls. And  
3 Mr. Swilley tried to explain some saying, "Well, who is  
4 doing most of the talking," but who is pulling the  
5 strings? Who is issuing the directions? Who is the one  
6 making the direct request? Who does what? In order  
7 words, remember, he talks about, well, don't show up. If  
8 you don't show up if there is no victim there is no crime.  
9 That's the defendant talking.

10           Well, the defendant is saying, "Get in touch with  
11 Wayne Jordan, Lieutenant Jordan, so that we can get this  
12 thing straight and we can talk to him and we can be  
13 together. And remember he wanted it so they could be  
14 together to verify their stories. That's the defendant  
15 talking. So I would say that Mr. Swilley, in that regard,  
16 it doesn't matter what the quantity of what is being said.  
17 It's the quality. And the quality that shows you that  
18 this defendant was trying to orchestrate and lie his way  
19 out of that; that prize goes to the defendant.

20           But I submit that I am confident enough to see that  
21 you are smart enough not to let that fly because I think  
22 it's obvious that the defendant was trying to manipulate  
23 Ms. Wright, to manipulate her daughter to lie so that he  
24 could get off on these charges. That's clear. And,  
25 again, as Mr. Swilley indicated, the tape is in evidence.

1 Excuse me. The recording is in evidence and can be  
2 replayed or read back.

3 And then you look at when you talk about credibility  
4 issues with the defendant, and you talk about the fact  
5 that he gets up here and he tries to make it seem like,  
6 oh, I dropped the knife at the time. I dropped the knife  
7 when he went, and they just beat me up. And speaking of  
8 the injuries, and I think Lieutenant Jordan testified to  
9 the fact, and you got the pictures. There is no denying  
10 it, and the officers in their report they testified, yeah,  
11 we hit him. Well he's got a knife, he is struggling.

12 And let's be honest. They could have killed him, but  
13 you know, when I talked about law enforcement officers and  
14 what not we always want to second guess and judge, but  
15 they always have a split second to make a decision. But  
16 despite everything that that man did that night to Ms.  
17 Wright, both Ms. Wrights, to Sergeant Coombs and to Dana  
18 Wallace, despite everything, they preserved his life.  
19 They didn't take his life.

20 And you know what, there should be some credit given  
21 to that because as Sergeant Coombs said under the  
22 circumstances, based on his training, based on what they  
23 are taught he had every reason to engage in deadly force  
24 but he didn't. He didn't. And you know what, that counts  
25 for something.

STATE OF SOUTH CAROLINA  
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Appellate Case No. 2014-000569

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THE STATE,

Respondent,

v.

JULIUS CURRY,

Appellant.

---

**PROOF OF SERVICE**

---

I, Sally B. Ellison, certify I served the Motion to Remand for Reconstruction of the Record on Appellant by depositing a copy in the United States mail, postage prepaid, addressed to:

Kathrine H. Hudgins  
Assistant Appellate Defender  
South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211-1589

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

This 12<sup>th</sup> day of March, 2015.



---

SALLY B. ELLISON  
Administrative Assistant

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

COPY

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MAR 17 2015

SC Court of Appeals

Appeal from Chesterfield County  
Paul M. Burch, Circuit Court Judge

THE STATE,

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V.

JULIUS CURRY,

APPELLANT

APPELLATE CASE NO. 2014-000569

RECEIVED  
MAR 17 2015  
SC OFFICE OF  
APPELLATE DEFENSE


**Return to State's Motion to Remand for Reconstruction of the Record**

The State moves to remand for reconstruction of the record of the tape recordings of a phone call Appellant made from the jail. The recordings were played for the jury but were not admitted in evidence and not transcribed by the court reporter. Appellant opposes the motion to remand for reconstruction of the record. Reconstruction of the tape recording is not necessary for purposes of the direct appeal. The issue on direct appeal involves the trial judge's failure to make findings in regard to the recordings.

The issue raised in the initial brief of Appellant is whether the trial judge erred in allowing the State to publish, over objection, recorded phone calls between Appellant, while he was in jail, and his then girlfriend, when the State did not introduce the recordings in evidence and the judge failed to determine if any probative value of the recordings was far

out weighed by the prejudicial impact. The issue on appeal involves, not simply the admission of the recordings, but the trial judge's failure to make any findings pursuant to Rule 403 before allowing the State to publish the recordings. Appellant submits that the issue presented on appeal can be decided without the content of the recordings of the jail phone call. Regardless of the content, the judge failed to make the required findings. This Court cannot review the trial judge's determination that any probative value of the recordings was far outweighed by the prejudicial impact because the trial judge failed to make any determination as to probative value and prejudicial impact.

Respectfully submitted,

  
\_\_\_\_\_  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR APPELLANT

This 17th day of March, 2015.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Chesterfield County  
Paul M. Burch, Circuit Court Judge

THE STATE,

v.

JULIUS CURRY,

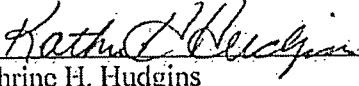
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APPELLATE CASE NO. 2014-000569

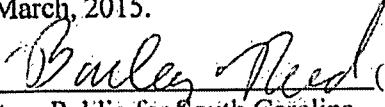
CERTIFICATE OF SERVICE

I certify that a true copy of the Return to State's motion to remand to reconstruction of the record in this case have been served on Deborah Shupe, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 17<sup>th</sup> day of March, 2015.

  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR APPELLANT

SWORN TO BEFORE ME this 17<sup>th</sup> day  
of March, 2015.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: October 24, 2021.