

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM AIKEN COUNTY
Court of Common Pleas
Post Conviction Relief

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SEP 04 2015
S.C. Supreme Court

Honorable R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No.: 2014-001651
Case No.: 2012-CP-02-0321

Russell Jackson,.....Petitioner,

vs.

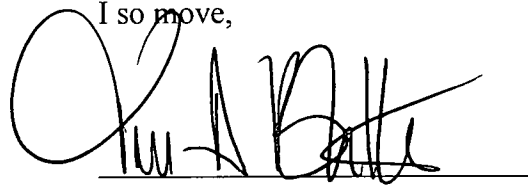
State of South Carolina,.....Respondent.

MOTION TO AMEND
PETITION FOR WRIT
OF CERTIORARI

On July 23, 2015, Petitioner, through counsel filed the Petition for Writ of Certiorari and Appendix in the above referenced appeal. On September 1, 2015, David Spencer, Senior Assistant Attorney General, notified counsel that the Statement of the Issue was not included in the Petition for Writ of Certiorari served on him on July 23, 2015. Due to a prison visit and court appearance in Spartanburg, counsel was not able to fully review the filed Petition until September 3, 2015. It is apparent that counsel mistakenly omitted the State of the Issue at the beginning of the Petition and at the Argument section as a result of revisions and formatting changes made to the Petition. Simply put, the version printed, filed with the Court and served on the State mistakenly

omitted these sections that appear in a prior draft. As a result, counsel would respectfully request that this Court accept an Amended Petition, which is being submitted in conjunction with this Motion. Counsel has discussed her mistaken omission with David Spencer, and he informed her that he did not oppose this Motion or an Amended Petition for Writ of Certiorari. Finally, counsel would request that the State's time for filing the Return to Petition for Certiorari be held in abeyance and/or set accordingly from the time of filing the Amended Petition for Writ of Certiorari.

I so move,

A handwritten signature in black ink, appearing to read 'Tricia A. Blanchette', written over a horizontal line.

Tricia A. Blanchette
Bar No. 74904
Post Office Box 12725
Columbia, South Carolina 29211
(803) 988-0008
Attorney for Petitioner

September 3, 2015

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Post Conviction Relief

Honorable R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No.: 2014-001651
Case No.: 2012-CP-02-0321

Russell Jackson,.....Petitioner,


vs.

State of South Carolina,.....Respondent.

CERTIFICATE OF SERVICE

I, Tricia A. Blanchette, Attorney for Petitioner, hereby certify a copy of a Motion to Amend Petition for Writ of Certiorari and an Amended Petition for Writ of Certiorari was hand delivered this 4th day of September 2015 to David Spencer with the Office of the Attorney General at:

Office of the Attorney General
ATT: David Spencer, Sr. Ast. AG
1000 Assembly Street, 5th Floor
Columbia, SC 29201



Tricia A. Blanchette
PO Box 12725
Columbia, SC 29211
(803)988-0008

September 4, 2015



LAW OFFICE OF TRICIA A. BLANCHETTE

September 3, 2015
VIA HAND DELIVERY

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

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SEP 04 2015

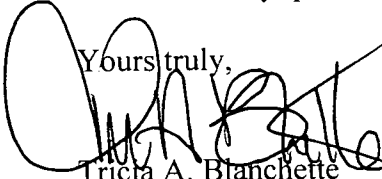
RE: Russell Jackson v. State; App. Case No.: 2014-001651
Docket No.: 2012-CP-02-0321

S.C. Supreme Court

Dear Sir:

For filing in the above referenced case, please find an original and six copies of a Motion to Amend Petition for Writ of Certiorari, an Amended Petition for Writ of Certiorari, and a Certificate of Service.

Thank you for your assistance with this matter. Please contact me with any questions.

Yours truly,

Tricia A. Blanchette
Attorney at Law

cc: David Spencer, Sr. Assistant Attorney General
Russell Jackson