

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
Edward W. Miller, Circuit Court Judge

APPELLATE CASE NO. 2013-000207

RECEIVED
APR 25 2016
SC Court of Appeals

THE STATE, RESPONDENT,

v.

RAYMOND YOUNG, APPELLANT.

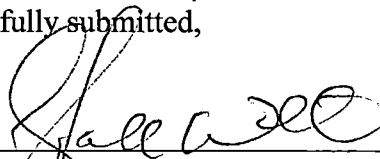
DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

- (1) True-billed indictment(s);
- (2) January 7, 2013 Trial Transcript (designated pages only): 1-34, **Jury Selection 49-67**; 70-72, 96-116, 148-150, 163-166, 180-181, 186-192, 199-203, 207-244, 247-254, 260-267, 272-278, 284-288, 507-508, 535, 542-543, 564-604, 647-693, 696-700, 705-725, 732-738, 740-759, 766-779, 781-782, 784-792;
- (3) Closing Arguments transcript Pages 1-117;
- (4) State's Exhibits 51 and 54, photographs; and
- (5) Court's Exhibit 3, note from juror.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Falkner Wilkes", written over a horizontal line.

J. FALKNER WILKES, 12893
114 WHITSETT STREET
GREENVILLE, SC 29601
(864) 282-1292

ATTORNEY FOR RAYMOND YOUNG

STATE OF SOUTH CAROLINA

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THE STATE, RESPONDENT,

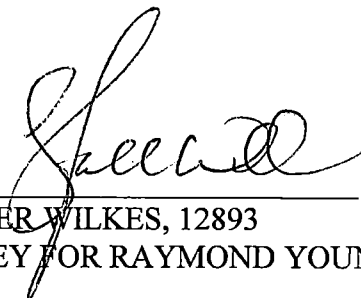
v.

RAYMOND YOUNG APPELLANT.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Initial Brief of Appellant and Designation of Matter in the above referenced case has been served upon the Respondent by placing a copy of same in the U.S. Mail, first class postage affixed addressed as follows:

J. Benjamin Alplin, Senior Asst Dept Atty Gen
Rembert Dennis Building
1000 Assembly Street, Room 519
Columbia, SC 29201..



J. FALKNER WILKES, 12893
ATTORNEY FOR RAYMOND YOUNG

April 21, 2016.

J. FALKNER WILKES

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April 21, 2016

Jenny Abbott Kitchings
Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

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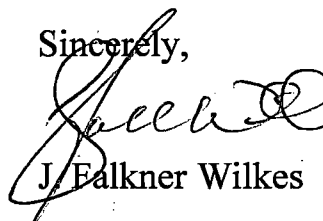
Re: State v. Raymond Young, Appellate Case No.: 2013-000149

Dear Ms. Kitchings,

I am enclosing the Initial Brief and Designation of the Appellant Raymond Young. I had filed a motion to consolidate Young's appeal with that of his co-defendant Esaiveus Frnantrez Booker in case 2013-000149. Except for one issue in my brief, the Booker brief and Young brief present the same issues on the same facts. I have, with the consent of Booker's counsel, incorporated the arguments in Booker's brief almost verbatim. The record would be identical save the portion of the transcript relating to the jury selection. Counsel for Booker has agreed to include those pages in her Record on Appeal to facilitate the consolidation of the appeals. As the issues and record, for the most part, are identical it would seem to serve everyone's best interests to consolidate and have a single panel hear the case. The consolidated record on appeal is of course very beneficial to Mr. Young.

I had held the initial brief and designation waiting for the ruling on the motion since that would have an impact on the captioning of the brief and how we proceed with the record. I am submitting the brief and designation at this time but would still like the Court to consider the motion to consolidate prior to the record on appeal having to be completed since I would like to avoid the cost and time that would be required to duplicate the record on appeal that will be submitted in the Booker case.

Sincerely,



J. Falkner Wilkes

c.

J. Benjamin Alpin
Office of the Attorney General
P.O. Box 11549
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