

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

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SEP 12 2016

The Honorable Brooks P. Goldsmith, Circuit Court Judge S.C. SUPREME COURT

Appellate Case No. 2015 – 001289

Melinda Richmond, #331874,.....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. The Richland County Grand Jury indicted Petitioner for murder. On November 14, 2008, Petitioner was convicted before the Honorable Edward W. Miller who sentenced Petitioner to forty years' imprisonment.
2. Petitioner's appeal was dismissed pursuant to an Anders¹ review on July 11, 2012.
3. Petitioner filed her application for post-conviction relief (PCR) on January

¹ Anders v. California, 386 U.S. 738 (1967).

11, 2013 (2013-CP-40-00233). Respondent filed a Return on May 8, 2013. A hearing was held on April 1, 2015. Petitioner was represented by William M Saltzman, Esquire. An Order of Dismissal was issued by the Honorable Brooks P. Goldsmith on May 18, 2015.

4. The Petition for Writ of Certiorari and Appendix in this case were filed on April 27, 2016. The Appendix, however, does not contain Petitioner's *pro se Anders* brief. This document was part of the lower record. Without this document, the appellate record is incomplete and, as such, it should be included in the Appendix. Further, Respondent wishes to reference this document in its Return.

5. Inasmuch as this document is relevant and pertinent material under Rule 243(f), SCACR that should be included in the Appendix, counsel respectfully requests to include the same in a Supplemental Appendix.

WHEREFORE, as the Appendix is incomplete, counsel for Respondent requests this Court to grant the motion to supplement the Appendix.

Respectfully submitted,

ALAN WILSON
Attorney General

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Assistant Attorney General
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By: 

ATTORNEYS FOR RESPONDENT

September 12, 2016.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

Certiorari to Richland County
Court of Common Pleas
The Honorable Brooks P. Goldsmith, Circuit Court Judge

Appellate Case No. 2015 – 001289
Lower Court Case No. 2013-CP-40-00233

MELINDA RICHMOND, #331874,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of Motion to Supplement Appendix and Supplemental Appendix has been served upon opposing counsel by mailing two (2) copies in the United States mail, postage prepaid:

William M. Saltzman, Esquire
Post Office Box 11879
Columbia, SC 29211

This 12th day of September, 2016



FELICIA V. HAYES
Legal Assistant For Respondent