

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

**RECEIVED**  
OCT 24 2016  
SC Court of Appeals

Case No.: 2016-000650

Terrell L McCoy, 256070, ..... Appellant

v.

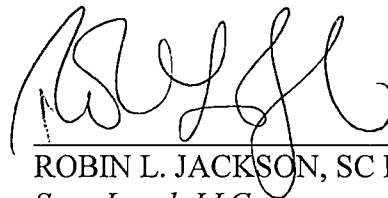
North Charleston Police Department and  
Sgt. Thomas Deckard, of which, North  
Charleston Police Department is, ..... Respondent

**RESPONDENT'S SUPPLEMENT TO ITS  
MOTION TO REQUIRE APPELLANT TO INCLUDE ALL DESIGNATED  
MATERIAL IN THE RECORD ON APPEAL**

On October 10, 2016, the undersigned received a partial Record on Appeal. Counsel sent a letter to the court advising that the proposed Record on Appeal from Inmate McCoy failed to include a document from Respondent's designations. As a supplement to that motion, it has now come to counsel's attention that a second document is also missing from the Record on Appeal. Therefore, both #2 and #5 of Respondent's designations are missing from the record on appeal. Both documents are cited in Respondent's brief and are important

to this appeal. Additionally, the copy of the transcript from the May 7, 2015 hearing is illegible. Respondent asks that the plaintiff be instructed to include these documents in the Record on Appeal and serve Respondent with a copy of the correctly numbered pages so Respondent may file its final brief. Respondent also asks that Appellant be required to serve a legible copy of the transcript of the May 7, 2015 hearing on the court.

Because it is impossible for Respondent to properly file a final brief without a complete Record on Appeal, Respondent believed that the deadline would automatically be held in abeyance. However, after speaking with the clerk, Respondent has been advised that a request to hold deadlines in abeyance must be included. Therefore, Respondent respectfully requests that the deadline for final briefs is held in abeyance pending the ruling on this motion, as Respondent cannot properly cite to the record if the documents are missing from it. The \$25 motion fee was previously sent for this motion and Respondent asks that this filing be considered an amendment or supplement to the previous motion.



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Robin@SennLegal.com

October 20, 2016

Attorney for Respondent

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that a true copy of Respondent's Supplemental to it's Motion to Require Appellant to Include all Designated Material in the Record on Appeal has been served upon the pro se appellant by mailing a copy properly addressed with sufficient postage affixed thereto this 20<sup>th</sup> day of October, 2016, to the following:

Inmate Terrell L McCoy  
Leiber Correctional Institution  
Edisto #12  
P.O. Box 205  
Ridgeville, SC 29472

  
\_\_\_\_\_  
ROBIN L. JACKSON

  
*Senn Legal*  
-LLC-  
ATTORNEYS AT LAW

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*Robin@sennlegal.com*

October 20, 2016

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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SC Court of Appeals

RE: McCoy v. North Charleston Police Department et al.  
Case No.: 14-CP-10-770 APP: 2016-00650

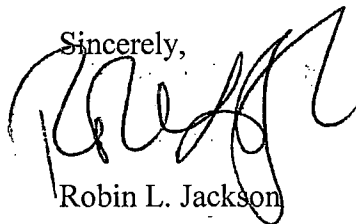
Dear Madam Clerk:

Please find enclosed a supplemental brief regarding Respondent's Motion to Require the Appellant to include all designated documents in the Record on Appeal.

Finally, I note that you sent a deficiency notice to the inmate at Broad River Correctional Institution. Please note that he has been moved to Lieber, as listed on his September 29, 2016 letter transmitting the Record on Appeal. Lieber CI, Edisto #12, P.O. Box 205, Ridgeville, SC 29472. I understand from your office that you cannot change his address without him filing something, so as the inmate is copied on this letter, I am hopeful he will file a change of address.

With kind regards, I am,

Sincerely,



Robin L. Jackson

RLJ/mos

cc: Inmate Terrell McCoy

ROBIN L. JACKSON, Esquire  
Senn Legal, LLC  
P.O. Box 12279  
Charleston, SC 29412

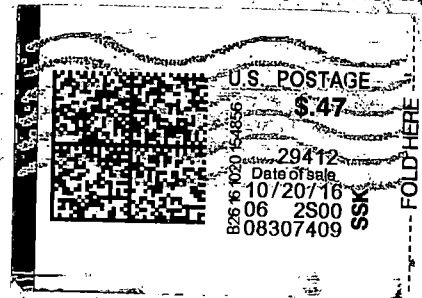
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SC Court of Appeals

CHARLESTON SC 29412

20 OCT 2016 PM 5:11



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SC Court of Appeals

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