

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Greenville County  
R. Lawton McIntosh, Circuit Court Judge

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DEC 16 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

PAULA REED ROSE,

APPELLANT

APPELLATE CASE NO. 2015-002445

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MOTION TO AMEND THE DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

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Counsel for Appellant respectfully requests this Court's permission to amend the designation of matter to be included in the record on appeal and to file a supplemental record on appeal in this case. In support of this motion counsel shows:

- 1) The Record on Appeal was filed and served today, December 16, 2016.
- 2) The transcript of Appellant's May 5-8, 2014 trial on before the Honorable R. Lawton McIntosh is over one thousand one hundred pages long with sixty-five exhibits. A post-trial motions hearing was held by Judge McIntosh on September 2, 2015.
- 3) Through inadvertence the page containing the trial court's ruling on the defense's motion for a directed verdict of acquittal was omitted from the designation of matter to be included on appeal.

4) In error, counsel also failed to include the designation of matter: State's Exhibit 25 (SLED forensic evidence report), the defense's memorandum submitted in support of post-trial motions, and Judge McIntosh's post-trial order denying the defense's motions.

5) These missing documents are relevant to issues raised on appeal. They are being filed as a supplemental record on appeal simultaneously with this motion.

6) In order to permit this Court a full review of the entire Record on Appeal, as designated by both parties, undersigned counsel requests the permission of this Court pursuant to Rule 212(b), SCACR to supplement the record on appeal.

7) As indicated below, opposing counsel consents to this request.

WHEREFORE, Counsel for Appellant requests leave to file supplemental records in the above titled appeal.

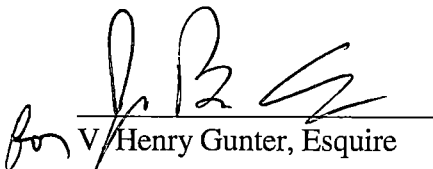


John H. Strom  
Appellate Defender

ATTORNEY FOR APPELLANT

December 16, 2016

I consent:



for V/ Henry Gunter, Esquire