

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of General Sessions

J. Cordell Maddox, Jr., Circuit Court Judge

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Case No. 2013-GS-26-05243  
Appellate Case No. 2016-001385

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

v.

Heather Elizabeth Sims, ..... Appellant.

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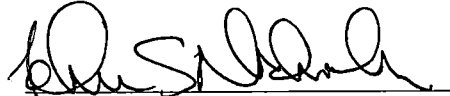
**MOTION TO RELEASE EXHIBITS**

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Pursuant to Rules 210(f) and 240, SCACR, Appellant requests that the Court issue an Order directing the delivery of the exhibits listed below from the Horry County Clerk of Court. The transcript of the trial in this case describes the exhibits as:

1. State's Exhibit 2 - CD interview/Chatfield;
2. State's Exhibit 4 - CD 911 Call.

Respectfully submitted,



Blake A. Hewitt # 73674

John S. Nichols # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, South Carolina 29202

Attorneys for Appellant

July 11, 2017

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served  
counsel with a copy of the *Motion to Release Exhibits* by mailing copies of the same by  
United States Mail with first class postage prepaid to the following address:

William F. Schumacher, IV  
Alan M. Wilson  
S.C. Attorney General's Office  
PO Box 11549  
Columbia, SC 29211



Erin Bridges

July 11, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

July 11, 2017

**VIA HAND DELIVERY**

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

RECEIVED  
JUL 11 2017  
SC Court of Appeals

RE: State v. Heather Sims  
Case Tracking No.: 2016-001385

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion to Release Exhibits* in this matter. I have also enclosed a proof of service of this document on counsel for the Respondent. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges  
Paralegal to Blake A. Hewitt  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: L. Morgan Martin, Esquire (by e-mail only)  
B. Alexander Hyman, Esquire (by e-mail only)  
William F. Schumacher, IV  
Alan M. Wilson, Esquire  
Jimmy A. Richardson, II