(5)

State of South Carolina
In The Court of Appeals

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SC Court of Appeals

Appeal From Richland County
22999 DeAndrea Benjamin, Court Judge

Casey Lewis,.. Appellant,

v.

The State,.. Respondent.

Supplemental Record on Appeal

Casey Lewis #259254
Ridgeland C.I BA-#34
P.O. Box 2039
Ridgeland S.C. 29936

Pro Se

The State of South Carolina
In The Court of Appeal

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Appeal From Richland County
DeAndrea Benjamin, Court Judge

Case No: 2016-000442

Casey Lewis ______________ Appellant

v.

The State ______________ Respondent

Appendix for Record on Appeal

Casey Lewis #259254
Ridgeland C.I BA-#34
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Alan Wilson
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Index

- Motion to Modify and Correct Sentence Pursuant to S.C. RCP Rule 29(b), Rule 60(b)1, Rule 60(b)3, Rule 60(b)4, and § Title 17-23-110.
- Motion to Dismiss (2015 declaratory Judgment action).

STATE OF SOUTH CAROLINA	)	IN THE COURT OF GENERAL SESSIONS
COUNTY OF WILLIAMSBURG	)	THIRD JUDICIAL CIRCUIT
State of South Carolina, Plaintiff,	)	CASE NO. <u>99-GS-45-18</u>
V. Casey Lewis #259254, Defendant,	)	MOTION TO MODIFY AND CORRECT SENTENCE PURSUANT TO S.C. RCP RULE 29(b), RULE 60(b)1, RULE 60(b)3, RULE 60(b)4, and §TITLE 17-23-110

COMES NOW the Defendant, Casey Lewis #259254, pursuant to S.C. RCP Rule 29(b), Rule 60(b)1, Rule 60(b)3, Rule 60(b)4, and §title 17-23-110, respectfully motions this Honorable Court to modify and correct the judgement sentence of incarceration imposed upon Defendant Casey Lewis #259254 in the Criminal General Session, 99-GS-45-18, on the date of 6-23-99.

On Feb. 1, 1999, the Defendant, Casey Lewis #259254, was indicted for the charge of murder under South Carolina Court of law 16-3-10. This indicted in the Feb. 1, 1999 period. The statue for the indicted charge of murder, 16-3-10, for that time period of "1999" reads verbatim in its most pertinent part with regards to the sentencing range allowed to be imposed on a defendant convicted of this offense, the following:

> <u>§16-3-20. Punishment For Murder: Separate sentencing proceeding to determine whether sentence should be death or life imprisonment.</u>
>
> A) A person who is convicted of or pleads guilty to murder must be punished by death, by imprisonment for life, or by a mandatory minimum term of imprisonment for thirty years.

On June 23, 1999, the Defendant, Casey Lewis #259254, was convicted of and sentenced to murder under statue 16-3-10 in the County of Williamsburg by Presiding Judge Honorable James E. Brogdon. Presiding Judge James E. Brogdon ruled not to sentence Defendant Lewis #259254 to death, although it is a punishment allowed under §16-3-20. Presiding Judge James E. Brogdon ruled not to sentence Defendant Casey Lewis #259254 to life imprisonment, although it is a punishment allowed under §16-3-20. Instead, the Presiding Judge James E. Brogdon determined and ruled to sentence Defendant Casey Lewis #259254 to a determinate number of years of incarceration to the South Carolina Department of Corrections. The determinate number of years of incarceration to the S.C. Dept. of Corrections that Presiding Judge James E. Brogdon imposed upon Defendant, Casey Lewis #259254, was fifty-five (55) years. [See Exhibit #1(a)].

The Defendant, Casey Lewis #259254, now motions the Honorable Court to modify and or correct this 55 years sentence of incarceration, because said 55 years of incarceration is void and constitutionally impermissable under the statutory construction of §title 16-3-20 underwhich Defendant Casey Lewis #259254 was indicted, convicted, and sentenced.

The statue §16-3-20 allows for only three punishments. Those punishments <u>must</u> be the following: Death, by imprisonment for life, or by a mandatory minimum term of imprisonment <u>for</u> thirty [30] years. This statue §16-3-20 is clear and unambiguous with outlining the punishment parameters of the offense of murder. When a statue is clear and unambiguous, the doctrine of "statutory construction" controls. In South Carolina, the Courts must strictly construe criminal statues against the states and in favor of the Defendant. <u>Williams v. State, 306 S.C. 89,91, 410 S.E.2d 563, 564 (1991); State v. Prince 335 S.C. 466, 472, 517 S.E.2d 229,232 (Ct. App. 1999)</u>. However, the cardinal rule of statutory construction is that

the Court must ascertain and effectuate the intent of the legislature, and in interpreting a statue, the Court must give their plain and ordinary meaning without resorting to a tortured construction which limits or expands the statue's operation. Mid-State Auto Auction of Lexington Inc. V. Altman 324 s.c. 65, 69, 476 S.E.2d 690, 692 (1996); Rowe V. Hyatt 321 S.C. 366, 369, 468 S.E.2d 649, 650 (1996). Morever, we should give statutory provisions a reasonable construction consistent with the purpose of the statue. Jackson V. Charleston County Sch. Dist. 316 S.C. 177, 181, 447 S.E.2d 859, 861 (1994).

The Defendant, Casey Lewis #259254, does not have an issue with the Presiding Judge James E. Brogdon sentencing him to a determinate number of years of incarceration with regard to the substance of this motion to modify and correct sentence. The Defendant, Casey Lewis #259254, does take significant issue with the afixed number of fifty-five [55] years of determinate years of incarceration that Honorable Judge James E. Brogdon imposed upon him because this 55 year sentence is 25 years in excess of the mandatory minimum term of imprisonment for 30 years that is allowed by plain reading of §16-3-20. The Defendant, Casey Lewis #259254, respectfully motions this Honorable Court to modify and correct the void sentence of fifty-five [55] years incarceration and afix a new determinate term of incarceration for thirty [30] years incarceration for the case #99-GS-45-18.

As a matter of clarity, the Defendant, Casey Lewis #259254, asks this Honorable Court to take judicial notice that Defendant Casey Lewis is charged and indicted under the "1999" year version of §title 16-3-20, and this version varies significantly from the present day 2010 year version of §title 16-3-20. In its most pertinent parts, the 2010 year version §title 16-3-20 does allow a 55 year sentence by virtue of the plain language of the statue. For example:

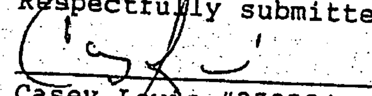
> "A person who is convicted of or pleads guilty to murder must be punished by death or by a mandatory minimum term of imprisonment for thirty years to life."

This clause of "Thirty to life" which is written in the 2010 version of the statue §title 16-3-20 makes a 55 year sentence constitutionally and statutorily permissable under the sentencing provision of the state. This clause of "Thirty to life" is absent in the 1998 year version of §title 16-3-20. Therefore, the 55 year sentence is constitutionally and statutorily prohibited under the "1999" sentencing provision of the statue, in which Defendant, Casey Lewis #259254, was sentenced. The South Carolina Legislator's legislative intent in crafting the "1999" year version, in which Defendant, Casey Lewis #259254, was sentenced limits the determinate years of incarceration for violation of the statue §16-3-20 to one specific term of years, that being thirty [30] mandatory incarceration. The S.C. Legislator's legislative intent in crafting the "2010" year version of §title 16-3-20 was to expand and broaden the determinate number of years of incarceration for violation of this statue to any number of years between thirty [30] years to the natural life expiration of the violator. This is a very distinctive and significant variation between the "1999" year version, in which Defendant, Casey Lewis #259254, was sentenced, and the 2010 year version of §title 16-3-20. The Defendant respectfully asks this Honorable Court to take judicial notice puruant to S.C. Rules of Crim. Proc. Rule 201.

WHEREFORE, the Defendant, Casey Lewis #259254, respectfully notions this Honorable Court to grant modification and correction of his 55 year sentence under the case 99-GS-45-18 and to vacate the constitutionally and statutorily prohibited 55 year sentence and resentence Defendant, Casey Lewis #259254, to a constitutionally and statutorily permissable sentence

of thirty [30] years incarceration in this criminal case #99-GS-45-18.

Respectfully submitted,



Casey Lewis #259254
B.R.C.I. Monticello A #228
4460 Broad River Rd.
Columbia, S.C. 29210

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 4th DAY OF February 2012

Susan H. Frye
NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES ______ ...n Expires ...5, 2018

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	IN THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND	)	
Casey Lewis #259254,	)	Civil Action No. 2015-CP-40-01104
	)	
Plaintiff,	)	
	)	**MOTION TO DISMISS**
vs.	)	
	)	
State of South Carolina,	)	
	)	
Defendant.	)	
	)	

TO: CASEY LEWIS, #259254, PLAINTIFF

PLEASE TAKE NOTICE THAT the Defendant, by and though its undersigned counsel, will move before this Court within ten (10) days of the date hereof (or at such other time and place as the Court determines) for an Order dismissing this action pursuant to Rule 12(b) of the South Carolina Rules of Civil Procedure and because the Plaintiff's request is barred by *res judicata*. For the reasons set forth herein, the Defendant respectfully submits that this action should be dismissed with prejudice.

Plaintiff filed this action, on or about February 20, 2015 alleging that the 1999 sentencing portion of the murder statute, Section 16-3-20, varies from the amended 2010 version. Section 16-3-20 was amended which added the language "to life" to the "mandatory minimum term of imprisonment for thirty years." Through this action, Plaintiff contends that his fifty-five (55) year sentence is constitutionally and statutorily prohibited because any sentence above thirty (30) years cannot be legally imposed. However, Section 16-3-20 provides for a ***mandatory minimum*** of thirty (30) years, ***not a maximum***. Moreover, this very same issue has been adjudicated in an action involving the same parties as here.

PROCEDURAL BACKGROUND

Plaintiff is currently incarcerated in Ridgeland Correctional Institution of the South Carolina Department of Corrections. Plaintiff was indicted in February 1999 for murder, armed robbery, possession of a weapon during the commission of a violent crime, and carrying a pistol onto premises or business selling alcoholic liquors, beers or wines for consumption. A jury trial on the charges of murder, armed robbery, and possession of a weapon, began on June 21, 1999. On June 23, 1999, Plaintiff informed the court that he wished to enter a guilty plea. The guilty plea was accepted and Plaintiff was sentenced to fifty-five (55) years for murder, thirty (30) years for armed robbery, and five (5) years on the weapons charge, all to run concurrent. The remaining charge was dismissed. Plaintiff, through counsel, attempted to file a notice of appeal; however, the appeal was filed late and rejected by the Court of Appeals. The remittitur was issued on January 4, 2000.

On May 26, 2000, Plaintiff filed an application for post-conviction relief ("PCR"). The Plaintiff raised ineffective assistance of counsel and involuntary guilty plea. The Court denied and dismissed the PCR Application on July 9, 2002. On April 8, 2004, the Supreme Court of South Carolina allowed the review of direct appeal issues, but denied relief.[1] *Lewis v. State*, Memorandum Opinion No. 2004-MO-016 (S.C. Sup. Ct. filed April 8, 2004). The Court issued the remittitur on April 26, 2004.

Plaintiff filed a *second* PCR action on June 30, 2004, which was dismissed as untimely and successive on January 29, 2007.

[1] Defendant notes that within the PCR appeal, Plaintiff attempted to raise a *pro se* issue that the murder statute did not support his fifty-five (55) year sentence. The *pro se* filing was dated June 19, 2003.

On or about February 11, 2013, Plaintiff filed a document titled "Motion to Modify and Correct Sentence Pursuant to S.C. RCP Rule 29(b), Rule 60 (b)1, Rule 60 (b) 3, Rule 60 (b) 4, and § Title 17-23-110" with the Williamsburg County Clerk of Court in his General Sessions Case Number 99-GS-45-18. (Attachment A). On August 17, 2013, the State filed a Motion to Quash Plaintiff's Motion to Modify and Correct Sentence. (Attachment B). The State argued, as its first position, that Plaintiff's post-trial motion was untimely. Plaintiff filed a response on September 23, 2013. A hearing on the State's motion was held September 12, 2013. The Court heard the motion and issued, that same day, an Order (Attachment C) dismissing the action as untimely: "Post-Trial motions following a trial in the Court of General Sessions generally must be filed within ten days of the imposition of the sentence. See Rule 29 (a) SCCRimP." The Court concluded that:

> The sentence in this matter was imposed on June 23, 1999. This action was filed on February 11, 2013. Accordingly, this Court finds that this action is untimely and therefore must be dismissed with prejudice.
>
> Next, this Court finds that the allegations made in this action are without merit and must be dismissed with prejudice. A plain reading of the statute under which Mr. Lewis was sentenced clearly indicates that an individual may be sentenced to a term of imprisonment for no less than thirty (30) years and up to life. The sentence of fifty five (55) years handed down to Mr. Lewis in this case is within the range contemplated by the statute and is therefore legal and permissible. Accordingly this Court finds that this ground is without merit and must be dismissed with prejudice.

Plaintiff was provided notice of this ruling on September 12, 2013. On September 23, 2013, Plaintiff filed a document, again in his General Sessions Case Number 99-GS-45-18, titled "Motion to Alter or Amend Pursuant to Rule 59(e)." The Court denied the motion to reconsider on October 22, 2013.

Plaintiff filed an appeal on or about January 21, 2014 from the denial of the motion to reconsider. The Court of Appeals dismissed the appeal on May 14, 2014. On or about Plaintiff filed a Writ of Certiorari to review the Court of Appeals' dismissal, which was ultimately denied on October 23, 2014.

I. Plaintiff's Request is Barred by *Res Judicata*

The doctrine of *res judicata* bars the Plaintiff from seeking the relief in this action. Under the doctrine of *res judicata*, "[a] litigant is barred from raising any issues which were adjudicated in the former suit and any issues which might have been raised in the former suit." *Judy v. Judy*, 393 S.C. 160, 172, 712 S.E.2d 408, 414 (2011) (quoting *Plum Creek Dev. Co. v. City of Conway*, 334 S.C. 34, 512 S.E.2d 109 (1999)). The elements of *res judicata* are: (1) identity of the parties; (2) identity of the subject matter; and (3) adjudication of the issue in the former suit. *Judy*, 393 S.C. at 167, 712 S.E.2d at 412 (citing *Riedman Corp. v. Greenville Steel Structures, Inc.*, 308 S.C. 467, 419 S.E.2d 217 (1992)). "[F]or purposes of *res judicata*, 'cause of action' is not the form of action in which a claim is asserted but, rather the 'cause for action, meaning the underlying facts combined with the law giving the party a right to a remedy of one form or another based thereon.'" *Plum Creek Dev. Co.*, 334 S.C. at 36, 512 S.E.2d at 110 (quoting 50 C.J.S. Judgment § 749 (1997)).

Here, the Plaintiff previously filed a "Motion to Modify and Correct Sentence Pursuant to S.C. RCP Rule 29(b), Rule 60 (b)1, Rule 60 (b) 3, Rule 60 (b) 4, and § Title 17-23-110" alleging the exact same issue - that his fifty-five (55) year sentence is constitutionally and statutorily prohibited because any sentence above thirty (30) years cannot be legally imposed. The State of South Carolina was represented by the Assistant Solicitor Tyler Brown. Attached hereto, and incorporated herein, is this Court's Order dismissing the action *with prejudice* dated September

12, 2013. Therefore, as the very same issue has been finally adjudicated in an action involving the same parties as here, *res judicata* bars Plaintiff from seeking the relief in this action. Accordingly, this action should be dismissed.

II. Lack of Subject-Matter Jurisdiction, Rule 12(b)(1), SCRCP

This Court lacks subject matter jurisdiction under Rule 12(b)(1) as the Plaintiff attempts to collaterally attack his sentence by misconstruing the plain language of Section 16-3-20, the sentencing guideline for murder.

Lack of subject matter jurisdiction can be raised at any time, can be raised for the first time on appeal, and can be raised *sua sponte* by the court. *State v. Guthrie,* 352 S.C. 103, 107, 572 S.E.2d 309, 311–12 (Ct. App. 2002) (citing *State v. Brown,* 351 S.C. 522, 570 S.E.2d 559 (Ct. App. 2002). Furthermore, lack of subject matter jurisdiction may not be waived, even by consent of the parties. *Id.* (citing *State v. Brown*, 343 S.C. 342, 346, 540 S.E.2d 846,848 (2001). "The acts of a court with respect to a matter as to which it has no jurisdiction are void." *Id.*

"The character of an action is not necessarily determined by such recitation in the pleadings. Rather, it is the nature of the issues and the remedies which are sought that is determinative." *South Carolina v. Yelsen Land Co.*, 257 S.C. 401, 403, 185 S.E.2d 897, 898 (1972).

"PCR is a proper avenue of relief *only when the applicant mounts a collateral attack challenging the validity of his conviction or sentence* as authorized by Section 17–27–20(a)." *Al-Shabazz v. State*, 338 S.C. 354, 367, 527 S.E.2d 742, 749 (2000) (emphasis in original). A PCR application filed pursuant to S.C. Code Ann. § 17-27-45(A) (2013), must be filed within one (1) year after the entry of a judgment of conviction or within one (1) year after the sending of the remittitur to the lower court from an appeal or the filing of the final decision upon an appeal,

whichever is later.

All applicants are entitled to a full and fair opportunity to present claims in *one* PCR application. *Odom v. State,* 337 S.C. 256, 523 S.E.2d 753 (1999). "Successive PCR applications and appeals are generally disfavored because they allow an applicant to receive more than 'one bite at the apple as it were.'" *Id., 337 S.C. at 261, 523 S.E.2d at 752.* "A successive PCR application is one that raises grounds not raised in a prior application, raises grounds previously heard and determined, or raises grounds waived in prior proceedings." *Id.* Filing a successive PCR application is only permissible if the applicant establishes that the grounds raised in the subsequent application could not have been raised in the previous application. *Id.*

In this case, the Plaintiff seeks to have his fifty-five (55) year sentenced vacated because he alleges any sentence above thirty (30) years cannot be legally imposed. Therefore, the nature of this action is collateral attack of his sentence under § 17-27-20(A). Accordingly, this Court lacks subject-matter jurisdiction.

III. Failure to State Facts Sufficient to Constitute a Cause of Action, Rule 12(b)(6), SCRCP.

This Court also lacks jurisdiction under Rule 12(b)(6) as the Plaintiff fails to state facts sufficient to constitute a cause of action.

A trial judge in the civil setting may dismiss a claim when the defendant demonstrates the plaintiff has failed to state facts sufficient to constitute a cause of action in the pleadings filed with the court. Rule 12(b)(6), SCRCP; *see Ashley River Properties I, LLC v. Ashley River Properties II, LLC*, 374 S.C. 271, 277, 648 S.E.2d 295, 298 (Ct. App. 2007); *Williams v. Condon,* 347 S.C. 227, 553 S.E.2d 496 (Ct. App. 2001). Dismissal of a complaint pursuant to Rule 12(b)(6) is appropriate where, as here, the allegations set forth on the face of the complaint and inferences reasonably deducible therefrom, even when viewed in the light most favorable to

the plaintiff, and with every doubt resolved in his behalf, fail to state any valid claim for relief. *Spence v. Spence,* 368 S.C. 106, 116, 628 S.E.2d 869, 874 (2006); *Gentry v. Yonce,* 337 S.C. 1, 5, 522 S.E.2d 137, 139 (1999); *Baird v. Charleston County,* 333 S.C. 519, 511 S.E.2d 69 (1999).

The South Carolina Declaratory Judgment Act gives courts the "power to declare rights, status and other legal relations." S.C. Code Ann. § 15-53-20 (1976). To state a cause of action under the Declaratory Judgment Act, a party must demonstrate a justiciable controversy. *Power v. McNair,* 255 S.C. 150, 154 S.E.2d 551, 553 (1970). "A justiciable controversy is a real and substantial controversy which is appropriate for judicial determination, as opposed to a dispute or difference of a ***contingent, hypothetical, or abstract character***." *Sunset Cay, LLC v. City of Folly Beach,* 357 S.C. 414, 423, 593 S.E.2d 462, 466 (2004) (emphasis added) (quoting *Power v. McNair,* 255 S.C. at 154, 177 S.E.2d at 553); *Graham v. State Farm Mutual Automobile Ins. Co.,* 319 S.C. 69, 71, 459 S.E.2d 844, 845 (1995); *Holden v. Cribb,* 349 S.C. 132, 137, 561 S.E.2d 634, 637 (Ct. App. 2002). "The concept of justiciability encompasses the doctrines of ripeness, mootness, and standing." *Sloan v. Greenville County,* 356 S.C. 531, 547, 590 S.E.2d 338, 346 (Ct. App. 2003) (quoting *Holden v. Cribb,* 349 S.C. 132, 137, 561 S.E.2d 634, 637 (Ct. App. 2002)).

The Declaratory Act is to be liberally construed and administered to achieve its intended purpose "to settle and to afford relief from uncertainty and insecurity with respect to rights, status and other legal relations." S.C. Code Ann. § 15–53–130 (1976). "However, the Declaratory Judgments Act does not require the court to give a purely advisory opinions as to the issues sought to be raised." *Auto-Owners Ins. Co. v. Rhodes,* 405 S.C. 584, 595, 748 S.E.2d 781, 787-788 (2013) (quoting *City of Columbia v. Sanders,* 231 S.C. 61, 97 S.E.2d 210 (1957)). "[A]n issue that is contingent, hypothetical, or abstract is not ripe for judicial review." *Colleton County*

Taxpayers Ass'n v. Sch. Dist. of Colleton County, 371 S.C. 224, 242, 638 S.E.2d 685, 694 (2006).

"No justiciable controversy is presented unless plaintiff has standing to maintain action." *Brock*, 313 S.C. at 519, 442 S.E.2d at 413. The Plaintiff carries the burden of demonstrating each of the three elements of standing: (1) an injury in fact which is (a) concrete and particularized and (b) actual or imminent, and not conjectural or hypothetical; (2) a causal connection between the injury and the conduct complained of; and (3) it must be likely, and not merely speculative, that the injury will be redressed by a favorable decision. *Charleston Trident Home Builders, Inc. v. Town Council of Town of Summerville*, 632 S.E.2d 864 (2006).

The Plaintiff lacks standing and fails to advance any cognizable claim or theory under which he would be entitled to the relief he seeks. The sentencing portion of the murder statute in 1999, the year in which the Plaintiff was convicted, reads as follows: "A person who is convicted of ... murder must be punished by death, by imprisonment for life, or by a mandatory minimum term of imprisonment for thirty years." S.C. Code Ann. § 16-3-20(A) (Supp. 1995) (emphasis added). The Plaintiff reads this to imply that the Court only had the option to sentence the Plaintiff to Death, to Life in Prison, or to thirty (30) years of imprisonment. Where typically in Statutory construction, "or" implies that it must be one or the other, the State offers that the controlling words with regard to the Plaintiff's allegation is the phrase "mandatory minimum" sentence. The Court has in its history made distinctions between "mandatory" sentences and "mandatory minimum" sentences. *See State v. De La Cruz*, 302 S.C. 13, Footnote no. 4, (1990). By providing that this mandatory sentence is the minimum, it only goes to reason that the legislature intended there to be a maximum, which would be life in prison. Accordingly, Plaintiff's Complaint should be dismissed with prejudice for failure to state facts sufficient to

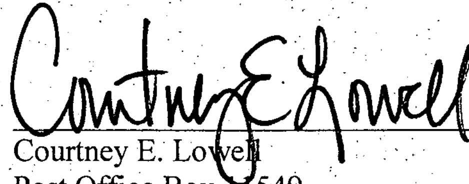
constitute a cause of action.

In conclusion, based upon the foregoing, Plaintiff's Complaint should be dismissed with prejudice.

Respectfully Submitted,

ALAN WILSON
Attorney General

COURTNEY E. LOWELL
Assistant Attorney General

BY: 
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ATTORNEYS FOR THE STATE OF SOUTH CAROLINA

COLUMBIA, SOUTH CAROLINA
SEPTEMBER 25, 2015

State of South Carolina
In The Court of Appeals

State of South Carolina
Respondent

V.

Casey Lewis
Appellant

RECEIVED
NOV 28 2016
SC Court of Appeals

Case No: 2016-000442

Certificate of Service

Comes Now the Appellant, Casey Lewis, Submitting this Certificate of Service to the Attorney General, Alan Wilson, and the Clerk for the Court of Appeals, Madam Jenny Kitchings. The Documents include the "Motion to Modify and Correct Sentence Pursuant to S.C. RCP Rule 29(b), Rule 60(b) 1-4 and § Title 17-23-110" and the "Motion to Dismiss (2015 declaratory Judgment action). All included in Supplemental Record on Appeal.

Respectfully Submitted
[signature]
Casey Lewis #259254
Ridgeland Corr. Inst. 3A-#34
Pro Se

State of South Carolina
Sworn to and Subscribed Before me this 21 Day of Nov. 2016
Virginia Robinson
Notary Public for South Carolina
My Commission Expires: May 20, 2021