

Court of Appeals  
Po Box 11330 Columbia SC. 29211

Kintha Kadden Sadler #353966  
McCormick Correctional Institution  
386 Redemption Way

McCormick S.C. 29999

November 22, 2017

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SC Court of Appeals

Kintha Kadden Sadler:

I will like to be giving a Opportunity to Amend My Pro Se brief to Johnson Case But be giving a OPPartunity to Amend a Batson Claim also In Effective Assitance of Appellate Counsel Claim also. To the fact My Trial Lawyer Thomas J. Quinn gave Mr. Robert M. Pachak my APPellate Defender Designation Matters to be included On My Record Of Appeals that would of have my Conviction Reversed and Remanded In my Direct of Appeal. IF Mr Robert M. Pachak would have Raised and had Included

(1) True-billed indictments:

(2) Entire Trial Transcript (January 7-12, 2013)

Mr. Robert M. Pachak Failed the Designation Contains NO matter but in of Fact the Designation Was "Irrelevant to my Direct of Appeal. If he have Included it on My Appeal He would of seen Supreme Court of the United States held the Equal Protection Clause of the Fourteenth Amendment to the Constitution of the United States forbids a Prosecutor

~~From~~ From challenging "Potential Jurors solely on account of their race or on the Assumption that black Jurors as a black defendant." In Georgia V. McCollum, 505 U.S. 42, 59 (1992), The Supreme Court held the Constitution also Prohibits a Criminal defendant from engaging in Purposeful racial discrimination in the exercise of Peremptory Challenges. When one Party strikes a Member of a Cognizable racial group the trial Court must hold a Batson hearing if the Opposing Party requests one. State V. Haiger 334 S.C. 623, 629, 515 S.E.2d 88, 90 (1999) In State V. Giles our Supreme Court explained the Proper Procedure for a Batson Hearing:

How every my Codefendant argues this Motion

Among others issues the Trial Court Erred Denying His Batson<sup>2</sup> Motion But later Reverse and Remand for a new Trial On his Court of Appeals Case.

This issue could have been raised on my Direct Appeal by my Lawyer Robert M. Pachak because it was Preserved for Review. Unfortunately he did not raise the issue on my direct appeal and will like to Amend my Pro se Response to Johnson Petition and to include the Batson claim as well as [Effective Assistance of Counsel] claim because Appellate Counsel did not raise the Batson issue on ~~the~~ Direct Appeal.

Sincerely,  
~~Kinta Sadler Kaddem~~  
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# 353966

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