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AUG 16 2018

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S.C. SUPREME COURT

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August 16, 2018
VIA HAND-DELIVERY

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

Re: George W. Hughes v. State of South Carolina.
Appellate Case No. 2018-000553

Dear Mr. Shearouse:

Attached please find for filing an original and six (6) copies of the Petition to Amend the Petition for Writ of Certiorari and Certificate of Service in the above captioned case. I was unable to contact opposing counsel concerning this request, therefore I have asked that Respondent convey their position concerning this motion directly to the Court. Thank you for your assistance in this matter. I remain,

Sincerely yours,

A large, elegant handwritten signature in black ink that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sg

Enclosures

cc: Christian Saville, Assistant Attorney General (by U. S. Mail)
George W. Hughes, # 364900
Frances Hughes

STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Robert E. Hood, Circuit Court Judge

Appellate Case No. 2018-000553

GEORGE W. HUGHES,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

PETITION TO AMEND PETITION FOR WRIT OF CERTIORARI

TARA DAWN SHURLING
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S. C. Bar No. 5099

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ATTORNEY FOR PETITIONER.

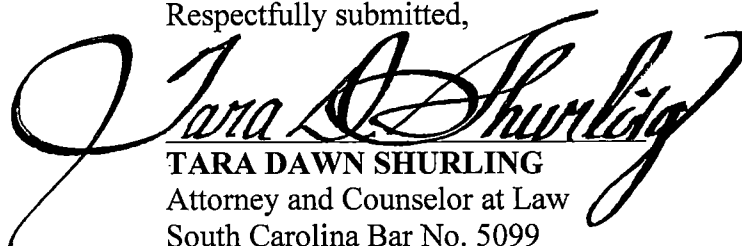
NOW COMES the Petitioner in the above captioned Post-Conviction Relief Appeal, acting by and through his appellate counsel, Tara Dawn Shurling, asking that he be permitted to amend his Petition for Writ of Certiorari submitted for filing on Tuesday, August 14, 2018. In support of this request, Petitioner would show unto this Honorable Court the following:

In Question Presented 12 of the Petition for Writ of Certiorari filed in this matter, Petitioner addresses the question of whether his waiver of his right to a direct appeal was knowingly and voluntarily entered. The Petitioner's request for a belated direct appeal was denied in the circuit court; therefore, the Petition for Writ of Certiorari should have been accompanied by a list of the direct appeal issues Petitioner asserts would have been raised had the belated direct appeal been granted. That list was inadvertently left out of the petition sent for filing on August 14, 2018.

CONCLUSION

In light of the above, Petitioner asks that he be permitted to amend his Certiorari Petition by adding the one page list of the five (5) direct appeal issues he would have briefed had a belated appeal been granted. See, Attachment A, List of Appellate Issues. Appellate Counsel has not been able to discuss this request with opposing counsel and therefore, asks that he relay his position on this request directly to this Honorable Court.

Respectfully submitted,



TARA DAWN SHURLING
Attorney and Counselor at Law
South Carolina Bar No. 5099

ATTORNEY FOR PETITIONER

This 16th day of August, 2018.

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Appellate Case No. 2018-000553

GEORGE W. HUGHES,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

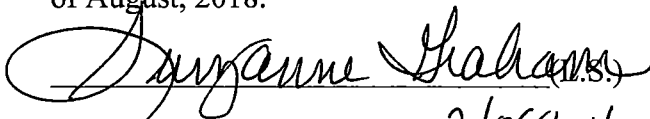
The undersigned attorney hereby certifies that a copy of the Petition to Amend the Petition for Writ of Certiorari for in the above-entitled case has been served upon opposing counsel this the 16th day of August, 2018 by mailing one (1) copy in a stamped envelope properly addressed to:

Christian Saville
Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211


TARA DAWN SHURLING
Attorney and Counselor at Law
S.C. Bar No. 5099

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 16th day
of August, 2018.


Dyanne Graham (S.S.)

My Commission Expires: 2/28/24

DIRECT APPEAL ISSUES

- 1) The trial court erred in denying the Petitioner's Motion for Directed Verdict of Acquittal at the conclusion of the State's case, and thereby violated his right to due process of law, where the evidence adduced by the prosecution was not sufficient to sustain a finding of guilt of murder.
- 2) The trial court erred in denying Petitioner's Motion for a Directed Verdict of Acquittal where the State failed to disprove Petitioner's claim of self-defense.
- 3) The trial court erred in overruling Petitioner's repeated objections to State witness Lamont Edwards being permitted to read portions of the law enforcement incident report into evidence as opposed to directly answering questions put to him by Trial Counsel.
- 4) The trial court erred in overruling Petitioner's objection to the introduction of State's Ex. No. 75, a photograph of the body of the deceased laying on a body bag, where the bloody photograph in question was far more prejudicial than probative and improperly appealed to the passions and prejudices of the jury at Petitioner's trial.
- 5) The trial court erred in overruling Petitioner's objection to the introduction of State's Exhibit No. 15, a Miranda waiver form, where Petitioner did not sign the form in question and where, the form its self may have been interpreted by the jury as strengthening the State's position that the statements attributed to the Petitioner by law-enforcement officers testifying at trial were knowingly and voluntarily given.