

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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JAN 23 2019

S.C. SUPREME COURT

Appeal from Horry County Court of Common Pleas
The Honorable William H. Seals, Circuit Court Judge

Appellate Case No. 2018-000054

Theodore Wills Jr.,.....Petitioner,

v.

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

MOTION FOR ORDER OF TRANSPORTATION

WILLIAM G. YARBOROUGH III

LAUREN C. HOBBS

WILLIAM G. YARBOROUGH III, ATTORNEY AT LAW, LLC
522 North Church Street
Greenville, South Carolina 29601
(864) 331-1612

COUNSEL FOR PETITIONER

NOW COMES Petitioner, Theodore Wills Jr., by and through undersigned counsel, and moves this Honorable Court to order the transportation of State's Exhibit 21, a copy of the recording of Petitioner's proffer statement to law enforcement admitted into evidence and played at trial. The inclusion of Exhibit 21 would complete the lower court record before this Court and Counsel respectfully submits that this Court's opportunity to review the exhibit in conjunction with the materials contained in the Appendix is necessary for thorough consideration of issues raised in the petition for writ of certiorari.

WHEREFORE Petitioner prays for this Honorable Court to issue an Order of Transportation for State's Exhibit 21.

Respectfully submitted,

WILLIAM G. YARBOROUGH III

LAUREN C. HOBBS

By: *Lauren C. Hobbs*

LAUREN C. HOBBS

South Carolina Bar #103190

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COUNSEL FOR PETITIONER

Greenville, SC
January 17, 2019

THE STATE OF SOUTH CAROLINA
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PROOF OF SERVICE

WILLIAM G. YARBOROUGH III

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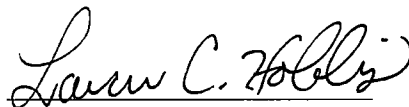
The undersigned hereby certifies that one (1) original motion for an order of transportation and six (6) true copies were filed with this Court, this day, the 17th of January, 2019, through the United States mail with sufficient postage attached addressed to:

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

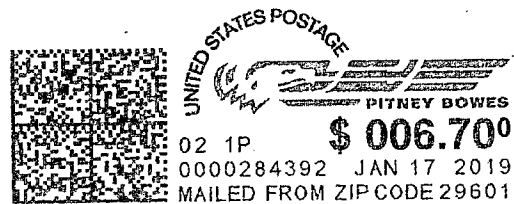
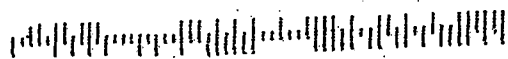
The undersigned further certifies that one (1) true copy of the motion for an order of transportation was served upon the Respondent this day, the 17th of January, 2019, through the United States mail with sufficient postage attached addressed to:

Senior Assistant Deputy Attorney General J. Benjamin Aplin
South Carolina Attorney General's Office
Post Office Box 11549
Columbia, South Carolina 29211

This 17th day of January, 2019



Lauren C. Hobbis, SC Bar #103190
William G. Yarborough III, Attorney at Law, LLC



William G. Yarborough III, Attorney at Law LLC
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Greenville, SC 29601

The Honorable Daniel Shearouse, Clerk of Court
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Columbia, SC 29211

*accidentally printed
envelope upside down
and tried to fix it.*