

MR. KENNETH BRYANT EVANS, II

March 4, 2019

SCDC # 308918

McCormick Correctional Institution

386 Redemption Way

McCormick, SOUTH CAROLINA, 29899

RE: FILE AND STAMP COPIES/ AND RETURN COPY TO ME

DEAR CLERK,

PLEASE FIND ENCLOSED TWO COPIES OF A MOTION FOR REQUEST TO PRODUCE AND INTERROGATORIES TO PLAINTIFF, PLEASE FILE, STAMP AND RETURN A STAMPED COPY TO ME ALSO FORWARD A COPY TO ATTORNEY GENERAL ALLEN WILSON.

I WOULD LIKE TO THANK YOU IN ADVANCE FOR YOUR TIME CONSIDERATION AND PROMPT REPLY REGARDING THIS MATTER.

RECEIVED

MAR 08 2019

SC Court of Appeals

RECEIVED

MAR 08 2019

S.C. SUPREME COURT

SINCERELY

SI

*Kent Evans*

RECEIVED

MAR 08 2019

1 of 3

March 4, 2019

S.C. SUPREME COURT STATE OF SOUTH CAROLINA ) IN STATE GRAND JURY OF :

PLAINTIFF ) SOUTH CAROLINA COURT

vs.

Case# 2017-GS-47-52

PROSE/ KENNETH BRYANT EVANS, III )

DEFENDANT: ) INTERROGATORIES OF PLAINTIFF,

TO: THE PLAINTIFF ABOVE NAMED:

PURSUANT TO RULE (33) OF THE STATE OF SOUTH CAROLINA OF CIVIL PROCEDURE, THE DEFENDENT KENNETH BRYANT EVANS, II, HEREBY PROPOUNDS AND SERVES THE FOLLOWING STANDARD WRITTEN INTERROGATORIES UPON THE PLAINTIFF, STATE OF SOUTH CAROLINA, ABOVE NAMED EACH TO BE ANSWERED SEPARATELY, IN WRITING AND UNDER OTHER OATH, WITHIN (30) DAYS FROM THE DATE OF THE SERVICE HERE OF

- 1) GIVE THE NAMES AND ADDRESSES OF PERSONS KNOWN TO THE PARTIES OR COUNSEL TO HAVE KNOWLEDGE CONCERNING THE FACTS OF THE CASE AND INDICATE WHETHER OR NOT WRITTEN OR RECORDED STATEMENTS HAVE TAKEN FROM THE WITNESSES AND INDICATE WHO HAS POSSESSION OF SUCH STATEMENTS,
- 2) SET FORTH A LIST OF PHOTOGRAPHS, PLATS SKETCHES, OR OTHER PREPARED DOCUMENTS IN POSSESSION OF THE PARTY THAT RELATE TO THE CLAIM OR DEFENSE IN THE CASE AND ANY SUCH DOCUMENTS THAT WILL BE OFFERED AS EVIDENCE IN THE TRIAL OF THIS CASE,

- 3) LIST THE NAMES AND ADDRESSES OF ANY EXPERT WITNESS WHOM THE PROPOSES TO USE AS A WITNESS AT THE TRIAL OF THE CASE.
- 4) FOR EACH PERSON KNOWN TO THE PARTIES OR COUNSEL TO HAVE KNOWLEDGE CONCERNING THE FACTS OF THE CASE, SET FORTH EITHER A SUMMARY SUFFICIENT TO INFORM THE OTHER PARTY OF THE IMPORTANT FACTS KNOWN TO OR OBSERVED BY SUCH WITNESSES, OR PROVIDED A COPY OF ANY WRITTEN OR RECORDED STATEMENTS TAKEN FROM SUCH WITNESSES.
- 5) FOR EACH EXPERT WITNESS WHOM THE PARTY PROPOSES TO USE AS A WITNESS AT THE TRIAL OF THE CASE, STATE:
  - (A) THE SUBJECT MATTER ON WHICH THE EXPERT IS EXPECTED TO TESTIFY;
  - (B) THE SUBSTANCE OF THE FACTS AND OPINIONS TO WHICH THE EXPERT IS EXPECTED TO TESTIFY; AND
  - (C) A SUMMARY OF THE GROUNDS FOR EACH OPINION.

THE FOREGOING INTERROGATORIES ARE TO BE REGARDED AS CONTINUING. AND YOU ARE REQUESTED TO PROVIDE PROMPTLY BY WAY OF SUPPLEMENTAL ANSWERS THERE TO SUCH ADDITIONAL INFORMATION AS MAY HEREAFTER BE OBTAINED BY YOU OR ANY PERSON OR ORGANIZATION ON YOUR BEHALF WHICH WILL AUGMENT OR OTHERWISE MODIFY ANY ANSWERS NOW GIVEN TO THE FOREGOING INTERROGATORIES.

PRO/SE MR. KENNETH BRYANT EVANS, II

SCDC# 308918

McCormick Correctional Institution

386 Redemption Way

McCORMICK, South Carolina

29899

SINCERLY,

SI

*Kenneth Evans*

SWORN TO BEFORE ME THIS

4 Day of March, 2019

*Bill W. Wilson*

NOTARY PUBLIC

9.30.26

MY COMMISSION EXPIRES

RECEIVED

MAR 08 2019

S.C. SUPREME COURT

RECEIVED

MAR 08 2019

March 4, 2019

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA | IN STATE GRAND JURY OF  
 PLAINTIFF | SOUTH CAROLINA COURT  
 vs. | CASE# 2017-CS-47-52  
 PRO/SE KENNETH BRYANT EVANS, II; |  
 DEFENDANT |

PURSUANT TO RULE (34) OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE, THE ABOVE NAMED IS HEREBY REQUESTED TO PRODUCE THE DOCUMENTS LISTED BELOW, THIRTY DAYS FROM THE DATE HERE OF OR AT SUCH REASONABLE TIME AND PLACES AS THE REQUESTED PARTY SHALL SPECIFY.

THE TERM "DOCUMENTS" WHEN HEREIN MEANS ALL ORIGINALS OF ANY NATURAL WHAT SO EVER, IDENTICAL COPIES AND ALL NON IDENTICAL COPIES THERE OF PERTAINING TO ANY MEDIUM UPON WHICH INTELLIGENCE OR INFORMATION IS RECORDED IN YOUR POSSESSION CUSTODY OR CONTROL, REGARDLESS OF WHERE LOCATED INCLUDING WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, PUNCH CARDS, PRINTOUT SHEETS, MOVIE FILM SLIDES, PHOTOGRAPHS, RECORDS MICROFILM, NOTES, LETTERS, MEMORANDA, LEDGERS, WORKSHEETS BOOKS, REGISTERS, CHARTS, CABLES, PAPERS, AGREEMENTS, CONTRACTS, PURCHASE ORDERS, ACKNOWLEDGEMENTS, INVOICE, AUTHORIZATION BUDGET, TELEGRAMS, ANALYSIS, PROJECTIONS TRANSCRIPTS, MINUTES OF MEETINGS, OF ANY KIND OF CORRESPONDENCE, DRAFT DATE, PROCESSING DISC, OR TAPES, OR COMPUTER PRODUCED, INTERPRETATION THERE OF INSTRUCTIONS, ANNOUNCEMENTS, SCHEDULES, AND, PRICE LIST IN ALL CASES WHERE ORIGINAL AND/OR

IDENTICAL COPIES ARE NOT AVAILABLE 'DOCUMENTS'  
 ALSO MEANS INDENTICAL COPIES OF ORIGINAL AND  
 COPIES OF NON-INDENTICAL COPIES.

NOTE: THESE SHALL BE DEEMED CONTINUING SO AS TO  
 REQUIRE SUPPLEMENTAL PRODUCTION PURSUANT TO RULE 26(E)  
 OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE.

D) ALL DOCUMENTS AND STATEMENTS IDENTIFIED IN ANSWER TO  
 DEFENDANTS MOTION TO PRODUCE PLAINTIFF.

PRO/SE KENNETH BRYANT EVANS II

SCDC# 308918

McCORMICK CORRECTIONAL INSTITUTION

386 Redemption Way

McCORMICK, South Carolina 29899

Sincerely,

SI

*Kenneth Evans*

SWORN TO BEFORE ME THIS

4 Day of March, 2019

*B. D. Waldeman*

NOTARY PUBLIC

9.30.20

MY COMMISSION EXPIRES


RECEIVED

MAR 08 2019

S.C. SUPREME COURT

Kenneth Evans - JUDGE 348110  
McLormick - F2/214  
386 Redemption Way  
McLormick, SC 29899



UNITED STATES POSTAGE  
  
PITNEY BOWES  
02 1P \$ 000.50<sup>0</sup>  
0000879469 MAR 06 2019  
MAILED FROM ZIP CODE 29899

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

2521191330 8099

