

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Cherokee County
Honorable Robin B. Stilwell, Circuit Court Judge

Case No.: 2017-001777

Alonzo Columbus Jeter, III **RECEIVED**

JUN 10 2019

PETITIONER,

v

SC Court of Appeals

State of South Carolina,

RESPONDENT.

MOTION FOR LEAVE TO FILE
LESS THAN THE REQUIRED AMOUNT
OF COPIES AND EXPAND SCOPE OF
COURT'S ORDER REGARDING COPIES

Less Than Required Amount

Petitioner seeks leave of the Court which would allow Petitioner to file less than the required amount of copies of filings.

Petitioner has submitted the following:

- 1) Motion for Judicial Notice of Supplemental Appendix
- 2) Motion to Amend Petition for Writ of Certiorari and to Enlarge Page Limit
- 3) Amendment to Petition for Writ of Certiorari
- 4) *This Motion For Leave To File Less Than The Required Amount of Copies And Expand Scope of Court's Order Regarding Copies

Petitioner is an indigent prisoner and does not have funds available to pay for copying costs. Petitioner submits that he is in-fact employed, however, pursuant to State laws he is not able

to receive pay for his employment.

Petitioner is mindful and does present his case and issues to the Court with judicial economy in mind. Also, Petitioner does not and has not submitted any frivolous filings or claims to the Court.

Petitioner seeks the Court's understanding and awareness that the recently submitted filings come only as a result of inadequate and ineffective assistance of PCR Counsel and in turn procedural irregularities which exist in this case. Petitioner has shown and provided the Court with strict, clear and undisputable evidence thereof. The filings are necessary as failure in submitting these filings would result in Petitioner's loss of equitable appellate review of his claims through no fault of his own but rather the actions of ineffective PCR Counsel.

Petitioner asks that this Court would grant leave to file less than the required amount of copies and would also accept the above stated filings.

Expansion of Court's Order

Petitioner shows the Court that it was ordered by the Court that the Division of Appellate Defense would provide the Court with copies of the petition, briefs and appendix. The Division of Appellate Defense has declined Petitioner's request that the Division provide the required copies of filings of motions, supplemental filings, amendments, etc., associated with this case stating that this was not specifically included in the Court's order. Therefore, Petitioner prays that the Court would expand the Court's order to allow that copies of other filings associated with this case shall be produced by the Division.

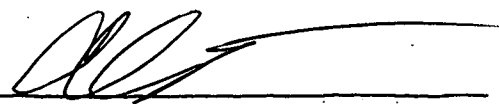
As stated above, these filings has only come as a result of inadequate and ineffective assistance of PCR counsel and the

procedural irregularities which exists in this case. Petitioner also reminds and has revealed the complexity of this case as it involves novel questions of law and is unprecedented.

Petitioner asks that the Court would expand the scope of the Court's order as due to the indigency of Petitioner, this is necessary.

CONCLUSION

WHEREFORE, Petitioner respectfully request that this Court would grant leave to file less than the required amount of filings, accept Petitioner's filings listed above, and expand the scope of the Court's order regarding copies produced by the Division of Appellate Defense. The Petitioner's indigence, clear proof of ineffective assistance of PCA counsel, and the complexity of this case would deem this both necessary and equitable.

Respectfully Submitted, 
Alonzo C. Jeter, III
PETITIONER/Pro Se

This 5th day of June, 2019.

June 5, 2019

Alonzo C. Jeter, III
Tyger River Correctional Institution
U-7-101 / #282902
200 Prison Road
Enoree, South Carolina 29335

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

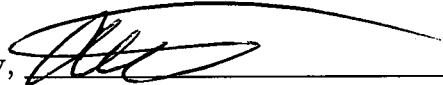
RE: Alonzo C. Jeter, III, v State of South Carolina
Appellate Case No. 2017-001777

Dear Ms. Kitchings:

For filing in the above referenced PCR appeal, please find enclosed the original of the *MOTION FOR JUDICIAL NOTICE OF SUPPLEMENTAL APPENDIX, MOTION TO AMEND PETITION FOR WRIT OF CERTIORARI AND TO ENLARGE PAGE LIMIT, AMENDMENT TO PETITION FOR WRIT OF CERTIORARI* and *CERTIFICATE OF SERVICE* for the same.

Please also find, enclosed, one (1) true copy additional of the same along with a self-addressed stamped envelope. Please return to me by way of this SASE, file-stamped copies of these said documents.

Thank you for your assistance in this matter.

Sincerely, 

Alonzo C. Jeter, III
PETITIONER / Pro Se

Cc: Vann Henry Gunter, Jr., Esquire
FILE

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Cherokee County
Honorable Robin B. Stilwell, Circuit Court Judge

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Alonzo Columbus Jeter, III,

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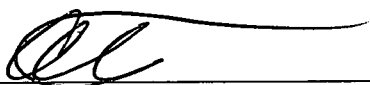
State of South Carolina,

RESPONDENT.

CERTIFICATE OF SERVICE

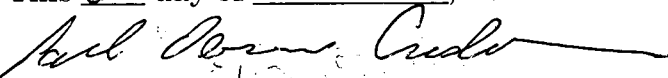
I, Alonzo C. Jeter, III, hereby certify that I have served a true copy of the *MOTION FOR JUDICIAL NOTICE OF SUPPLEMENTAL APPENDIX, MOTION TO AMEND PETITION FOR WRIT OF CERTIORARI AND TO ENLARGE PAGE LIMIT*, and *AMENDMENT TO PETITION FOR WRIT OF CERTIORARI* upon the Respondent by placing the same inside of a postage prepaid envelope and placing said envelope in the hands of Tyger River Correctional Institution's mail room personnel on this 6th day of JUNE, 2019, for mailing via the United States Mail, addressed as follows: Vann Henry Gunter, Jr., Esquire, Assistant Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia, South Carolina 29211.

S/


Alonzo C. Jeter, III, #282902
PETITIONER PRO SE

Tyger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335

SWORN and Subscribed before me
This 6th day of JUNE, 2019



Notary Public for South Carolina
My Commission Expires: Dec. 10, 2024

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Honorable Robin B. Stilwell, Circuit Court Judge

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SC Court of Appeals

Alonzo Columbus Jeter, III,

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State of South Carolina,

RESPONDENT.

CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have served a copy of the Motion For Leave To File Less Than The Required Amount of Copies And Expand Scope of Court's Order Regarding Copies upon the Respondent by placing the same inside of a postage prepaid envelope and placing said envelope in the hands of Tyger River Correctional Institution's mail room personnel on this 6th day of June, 2019, for mailing via the United States Mail, addressed as follows: Vann Henry Gunter, Jr., Esquire, Assistant Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia, South Carolina 29211.

SWORN and subscribed before me
this 6th day of June, 2019

Paul Dean Cull
Notary Public for South Carolina
My Commission Expires: Dec. 10, 2024

Alonzo C. Jeter, III, #282900
PETITIONER/Pro Se

Tyger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335

June 5, 2019

Alonzo C. Jeter, III
Tyger River Correctional Institution
U-7-101 / #282902
200 Prison Road
Enoree, South Carolina 29335

The Honorable Jenny A. Kitchings
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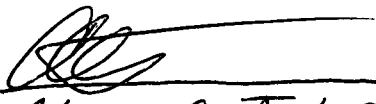
RE: Alonzo C. Jeter, III, v State of South Carolina
Appellate Case No. 2017-001777

Dear Ms. Kitchings:

For filing in the above referenced PCR appeal, please find enclosed original copy of Motion For Leave To File Less Than The Required Amount of Copies And Expand Scope Of Court's Order Regarding Copies and a Certificate of Service for the same.

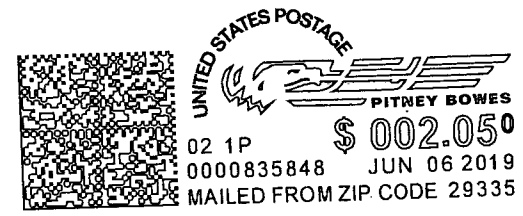
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Thank you for your assistance in this matter.

Sincerely, 
Alonzo C. Jeter, III
PETITIONER / Pro Se

cc: Vann Henry Gunter, Jr., Esquire
FILE

Alonzo C. Jeter, III
Tyger River Correctional Institution
U-7-101/#282902
200 Prison Road
Enoree, SC 29335



The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
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