

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

Case No. 2017-001777

RECEIVED

OCT 28 2019

SC Court of Appeals

Alonzo Columbus Jeter, III,

v

PETITIONER,

STATE OF SOUTH CAROLINA,

RESPONDENT.

NOTICE OF RESERVATION OF
OBJECTION OF MOTION TO
REOPEN THE PCR RECORD

The Petitioner, Alonzo C. Jeter, III, hereby reminds this Honorable Court and gives notice that he does in fact reserve his objection of the motion to reopen the PCR record which was submitted in the lower court at PCR proceedings on April 27, 2017.

The hearing on the State's motion to reopen the record was held on June 30, 2017, wherein Petitioner did object to the motion. However, the Honorable Robin B. Stilwell, did grant the State's motion partially due to the acts of Petitioner's ineffective PCR Counsel. Specifically, Petitioner's ineffective PCR Counsel action of submitting Petitioner's criminal history reports into the record. (App. p. 130-134).

Although these criminal history reports were entered into the

pcr record at that time, the PCR Judge never took Judicial notice of the records, never ruled upon the credibility, veracity or authenticity of the records.

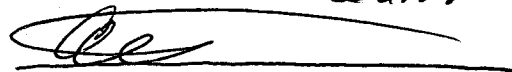
The total of the records were not included in the Appendix which was composed by attorney LaNette C. Durant of the Division of Appellant Defense and Petitioner filed a Motion to Supplement the Appendix to this Court on August 23, 2019, seeking opportunity to provide the records which were not included within the Appendix.

This Honorable Court did grant Petitioner's motion to supplement the appendix by written order filed on October 10, 2019.

As Petitioner submits these records, he does so while reserving his objection of the reopening of the PCR record. Petitioner has raised in his Petition for Writ of Certiorari an issue regarding the violation of his due process rights and PCR Court's error in allowing the PCR record to be reopened.

Petitioner's act of supplementing the record to provide the court with these complete records, is in no way intended to be construed as to assume that Petitioner concurs and agrees with the reopening of the PCR record. Petitioner does remain opposed to the reopening of the PCR record and still pursues the claim and issue of due process violation and abuse of discretion of the PCR Court.

Respectfully submitted,


Alanzo C. Jeter, III
PETITIONER/Prose

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

This 21st day of October, 2019
at Enoree, South Carolina

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

Case No. 2017-001777

RECEIVED
OCT 28 2019
SC Court of Appeals

Alonzo Columbus Jeter, III,

PETITIONER,

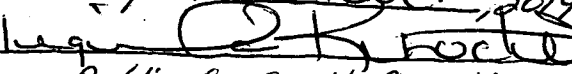
STATE OF SOUTH CAROLINA,

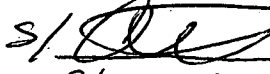
RESPONDENT.

CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have served a copy of the MOTION TO FILE LESS THAN REQUIRED AMOUNT, SUPPLEMENTAL APPENDIX II, NOTICE OF RESERVATION OF OBJECTION TO MOTION TO REOPEN THE PCR RECORD, REQUEST FOR ADMISSION, CITATION OF SUPPLEMENTAL AUTHORITIES, MOTION TO ARGUE AGAINST PRECEDENT, upon the Respondent by placing the same inside of a postage prepaid envelope and placing said envelope in the hands of Tiger River Correctional Institution's mail room personnel on this 24 day of October, 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 24 day of October, 2019


Notary Public for South Carolina
My Commission Expires: March 24, 2021


Alonzo C. Jeter, III, #282902
PETITIONER/Prose

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

October 21, 2019

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
Columbia, SC 29211

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

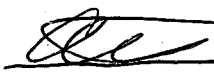
Dear Ms Kitchings:

For filing in the above referenced PCR appeal, please find enclosed Motion To File Less Than Required Amount, Supplemental Appendix II, Notice of Reservation of Objection To Motion To Reopen The PCR Record, Request For Admission, Citation of Supplemental Authorities, Motion To Argue Against Precedent, and Certificate of Service for the same.

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

Thank you for your assistance in this matter.

Sincerely,


Alonzo C. Jeter, III
PETITIONER/Prose

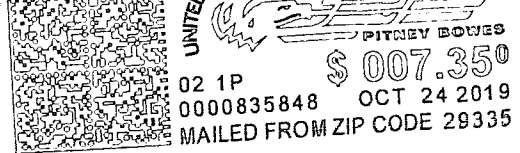
CC: Van Henry Gunter, Jr., Esquire
FILE

RECEIVED

OCT 28 2019

SC Court of Appeals

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
Columbia, South Carolina 29211

RECEIVED

OCT 24 2019

TYRCI MAILROOM

RECEIVED

OCT 28 2019

SC Court of Appeals