

Robert Watkins
Appellant
v
The State of South Carolina
Greenville County
Respondent

In The S.C. Court of Appeals

16 pages

Notice of Appeal

Case # 2012-ES-237-063

11-22-2019

Dear Jenny Abbott Kitching Clerk of Court of S.C. Court of Appeals

I have enclosed the filed page of two Motions I filed with the office of the Clerk of Court of General Sessions Greenville County, one on Feb. 5th 2019 entitled Motion for a new trial pursuant to Brady violation. Brady v Maryland 373 US 83 (1963) ~~see exhibit # 1 attached and enclosed~~

~~I filed another Motion on March 23 2019 @ Doc (Exhibit # 2) pages attached and enclosed. see exhibit # 3~~

~~I had not heard anything on these motions, so~~

I filed another Motion on March 27 2019, see Id as exhibit # 1 attached and enclosed.

I had not heard anything from the courts in reference to my Motion so I wrote a letter to The chief Administrative Judge and Solicitors office of Greenville County. ~~see~~ concerning my motions. see Id as exhibit # 2 attached and enclosed

I then received a letter dated September 28 2019 from Judge Letitia H. Vanderi. stating the following

RECEIVED

NOV 26 2019

SC Court of Appeals

Mr. Wathkins,

I am writing to inform you that I received your letter. I have checked and you have nothing pending in Greenville County in the court of Common Pleas or General Sessions. Therefore your Motion is respectfully denied. see Ed as Exhibit #3 attached and enclosed

I then wrote the Clerk of Court of General Sessions Court, Mr Paul B Wickensimer concerning the disposition of my pending Motions dated 10-23-2019 see Ed as Exhibit #4 attached and enclosed.

~~On November~~ I received a Response to my letter from Assistant Clerk of Court Leanda King dated November 13-2019 in response to my letter Ed as Exhibit #4 attached and enclosed, in which I was informed, my letter was forwarded to the Solicitors Office and to Administrative Judge for General Sessions. There are no documents in the indictment file that would indicate a disposition of the motion or if they are still pending. see Ed as Exhibit #5 attached and enclosed,

~~the way~~ ~~the~~ Judge Letitia H Verdini letter Ed as Exhibit #3 attached and enclosed is not the proper way the way legally in which to rule on my motions

Id in Exhibit 1. Plus her letter doesn't state what Motion she
is denying. How am I to appeal her denying of my Motion. Id in Exhibit #3
attached and enclosed. This is not the first
time this Judge Verdin has done this; see Id in Exhibit #6
where I sought an appeal of one of this Judge's letters to me
in which my Motion was denied. I sought to appeal that Judge's
order or denial of my Motion, but Court appeals accepted
my appeal and gave it Appellate Case number 2017-001863
see Id in Exhibit #6 attached and enclosed my appeal was dismissed
without prejudice. So the circuit Court could issue a ruling. I guess
I will have to go through the same process again...

I therefore am providing this Court with my Notice of Appeal
of Judge Letitia H. Verdin denying my Motion. Id in Exhibit #3
attached and enclosed. I am also providing the office of the clerk of Court
of Grand Sessions, and through that office, providing The Solicitor's
office of my Notice of Appeal - in reference to my Motion
Id in Exhibit #1 filed Feb. 5, 2019, and March 27, 2019.

I respectfully ask you Jenny Abbott Kitchings to return
a copy of my exhibits 1-6 to me for my records due
to my indigency. Thank you

cc Peter J. Appel
Sent to Schools Office
Greenville County

Respectfully Submitted by
Robert Watters 243803

GRA 122

Perry Lane Inst

430 Oaklawn Rd

Pelzer SC 29669



Office of the Clerk of Court
Greenville, South Carolina
Paul B. Wickensimer
Clerk of Court

Circuit Court Division
Greenville County Courthouse
305 East North Street
Greenville, South Carolina 29601
(864) 467-8551 FAX (864) 467-8540

Exhibit #1
6 pages

February 5, 2019

Robert M. Watkins, 243803
Q2A 122
Perry Correctional Institution
430 Oaklawn Rd
Pelzer SC 29669

Dear Mr. Watkins:

I hope you are doing well. I have received your request for copies of the last two motions filed in your case in General Sessions Court. Enclosed is a Motion to Set Aside Judgment of the S. C. Supreme Court filed on March 27, 2019 and a Motion for a New Trial filed on February 19, 2019. I hope these were the motions you were looking for.

Take care and God bless you!

Best wishes,

Leanda King
Assistant Clerk of Court



**Greenville
County**

Office of the Clerk of Court
Greenville, South Carolina

**Paul B. Wickensimer
Clerk of Court**

Circuit Court Division
Greenville County Courthouse
305 East North Street
Greenville, South Carolina 29601
(864) 467-8551 FAX (864) 467-8540

February 5, 2019

Robert M. Watkins, 243803
Q2A 118
Perry Correctional Institution
430 Oaklawn Rd
Pelzer SC 29669

Dear Mr. Watkins:

Thank you for your continued well wishes and prayers for me and my family. I hope you are well also.

We have received and filed your Motion for a New Trial. A copy has been sent to the Administrative Judge for General Sessions, The Honorable Letitia Verdin, and a copy to the Solicitor's office. I have enclosed a copy for your records.

Best wishes,

Leanda King
Assistant Clerk of Court

Re Robert Watkins

Case 2012-08-23-0063

Motion for a New trial
Pursuant to Brady violation

2012-08-23-0063

1-24-2019

19 FEB 5 PM 4:15
Paul Wickensimer, CDC, GVL, SC

Dear Mrs Leanda King Deputy Clerk of Court

How are you doing Ma'am. Be the will of God, I pray that all is well with you and your family. Ma'am enclosed you will find, My Motion for a New trial pursuant to violation of The Brady Rule Brady v Maryland, 373 U.S. 83 (1963), and attached and enclosed exhibits. Please file my Motion, and provide a copy of it and exhibits with the 13th Judicial Circuit Solicitors office, and the administrative Judge, due to my indigency, I can't pay for having hand written documents copied, and they want copy photographs, or anything that is not a legal document from an government agency. As always I appreciate your assistance in this ~~most~~ legal matter due to my indigency I've attached an ^{sworn} affidavit of indigency. Please send me a filed copy back to me for my records.

Thank you
Very Truly Yours.

Robert Watkins 243803 @24718
Perry Correctional Institute
~~Institution~~
430 Oaklawn Rd
Pelzer SC 29669

- emailed to AJ/50
- net. copy to def. as req.

Robert Watkins
defendant

v

The State of South Carolina
Greenville County
Respondent

In the State of South Carolina
Court of General Sessions
13th Judicial Circuit Court of
Greenville County

Criminal Case/Indictment Docket Number
2002-65-23-1063

Feb 24, 2019

19 FEB 25 PM 4:15
Paul Mickenshawer COC GVL SC

Motion for a New trial Pursuant to
Brady violation: Brady v Maryland, 373 U.S. 83
(1963).

The above named Defendant comes before this Honorable Court by way of
Motion for a New Trial Pursuant violation of the Brady Rule
Citing Brady v Maryland 373 U.S. 83 1963.

Exhibits attached.

4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19,
21, 22A, 22B, 23A, 23B, 26

RECEIVED

JAN 29 2018

P.C.I. MAILROOM

2/10/19

3-19-2019

19 MAR 27 PM 2:18
Paul Wickens@mer-0003@LSC

Dear Mrs Leonda King

I have enclosed a ^{sworn} verification, and Sworn Application
To proceed without Payment of Costs and
Affidavit in Support Thereof.

If this is enough or meets the requirements which you can file
by motion in the ~~the~~ Court of Common Pleas. If not, please file
it in the General Session Court, that if based on the ~~the~~ sworn
verification and sworn affidavit to proceed without Payment
of Cost and affidavit in Support Thereof.

Thank you

Respectfully Submitted

by Robert Watkins 243803 GRACIS

P.C.F

430 oaklawn Rd

Reher SC 29669

Please provide copy
to Adm Judge
Selectors Office

Thank you

-emailed to AJ/SO
-ret copy to def cas reg

Robert Watkins
Pro-se Plaintiff

v

The State of South Carolina
Greenville County
Respondent, Defendant
Alan Wilson
William M. Blitch Jr

In the State of South Carolina Court of Common Pleas
Greenville County.

Complaint: Case # _____

Criminal Case number# 2002-GS-23-1063

2-25-2019

Pro-se Independent Motion to set aside Judgment
of SC Supreme Court opinion No 27334

Pursuant to SCRCP Rule 60(b)(3) on grounds of
fraud upon the court and reinstate The Judgment of
SC Court of Appeals unpublish opinion. 2011-UP 091. Staley v
Robert Watkins.

19 MAR 27 PM 2:18
Paul Wickensmer C008 811 500

Pro-se Plaintiff. Robert Watkins comes before this Honorable Court by way of
Pro-se Independent Motion to set aside Judgment Pursuant to SCRCP Rule 60(b)(3)
fraud upon the Court:

Respectfully submitted by
Pro-se Plaintiff
Robert Watkins 293803
Q2A 118
P. C. J.
430 Oaklawn Rd
Pete SC 29469

Motion consists of 60 pages
Exhibits 1-10 attached
and enclosed

Robert Watkins
defendant
v
The State of South Carolina
Greenville County
Respondent

In the state of South Carolina
Court of General Sessions
13th Judicial Circuit
Greenville County

Exhibit # 7

Criminal Case Indictment # 2002-65-23-1063

letter

9-17-2019

To the Chief Administrative Judge and
to the 13th Judicial Circuit Court Solicitor Office of Greenville County

On February 5th 2019 this office received a copy
of my January 24, 2019 motion for a new trial pursuant to Brady violation
Brady v Maryland 373 U.S. 83 (1963) filed on Feb. 5th 2019. In reference to the
above listed case; Criminal Case/Indictment Docket number 2002-65-23-1063.
a copy was filed with the office of the clerk of Court of General Sessions
Court Greenville County and a copy provided to the Administrative Judge
Letitia Venable. There has been no disposition of my motion, nor has the Solicitor's
office made a return to my motion. It is my understanding that although S.C. Supreme
Court has ruled S.C. 1976 Code of Law 1-7-330 unconstitutional violation of S.C.
Const. article 1 section 8 - Separation of Powers. Greenville County is still allowing the
Circuit Solicitor Office of Greenville County to control the General Sessions Court
dockets and if this is true. Then this is why no action has been taken on
my motions above mentioned. I am requesting that the Solicitor's Office of Greenville
County take legal action as required by the laws of this state, to see that the
processing of my motion is placed on the General Session Court docket
for Greenville County to be heard and adjudicated so that I may proceed
to the next phase if necessary. I am providing the Chief Administrative
Judge a copy of this letter. I wish to bring notice of this letter

that that judge contact the solicitors office, to see why this motion has not been scheduled to be heard and ruled upon

cc: Chief Justice Beasley
cc: SC Court Administrator
cc: Chief Administrator Judge of Greenville County
cc: Solicitors Office Greenville County

Respectfully Submitted by
Robert Watters 243803 Q2A122
P. C. T.
430 Oaklawn Rd
Pelzer SC 29669

Robert Watters

sworn to before me on this

18th day 9th month 2023 year

SC Notary: Tamara Conwell

exp date 9-25-2023



Exhibit #3

State of South Carolina
The Circuit Court of the Thirteenth Judicial Circuit

Letitia H. Verdin
Judge

Greenville County Courthouse
305 East North Street, Suite 318
Greenville, SC 29601-2120
Phone: (864) 467-8448
Fax: (864) 467-8504
lverdinj@sccourts.org

September 24, 2019

Robert Watkins
Perry Correctional Institution
430 Oaklawn Road
Pelzer, SC 29669

Re: State of South Carolina v. Robert Watkins, indictment no.: 2002GS231063

Mr. Watkins:

I am writing to inform you that I received your letter. I have checked and you have nothing pending in Greenville County in the court of Common Pleas or General Sessions. Therefore, your motion is respectfully denied.

Sincerely,

A handwritten signature in black ink, appearing to be "LH Verdin", written over a horizontal line.

Letitia H. Verdin

Robert Watkins
defendant

The State of South Carolina
Greenville County
Respondent

In The Court of General Sessions office of
The Clerk of Court Greenville County

Exhibit 84

Request for disposition
of pending motions

Criminal Case 2002-GS-23-1063

15 NOV 12 PM 4:34
Paul Wickensimer 000601 SC

10-23-2019

Dear Mr Paul B Wickensimer

I am requesting the present status of two Motion I filed
Pruse with the office of the clerk of Court Greenville County

One is entitled: Criminal Case 2002-GS-23-1063 dated 2-25-2019

Pruse Independent Motion to set aside Judgment of the S.C.
Supreme Court Opinion 200 27334 Pursuant to SCRAP Rule 60(b)3
on grounds of fraud upon the Court and reinstates the judgment
of SC Court of Appeals unpublished Opinion 2008-UP-091 state v.
Robert Watkins. it was filed on March 27, 2019. The other
Motion were dated 1-24-2019. Motion for a new trial Pursuant to

Brady violation. Brady v. Maryland, 373 U.S. 83 (1963)
filed with your office on Feb 5, 2019. Are these motions still
pending? Please send me the disposition of those Motion if they
have been adjudicated (heard) dismissed, when or if no action
will be taken on those Motions and why.

Thank you
Respectfully Submitted by
Robert Watkins 243003 QRA122
P. C. I
730 Oaklawn Rd
Aiken SC, 29669

emailed to AJ/SO

Robert H S



**Greenville
County**

**Office of the Clerk of Court
Greenville, South Carolina**

**Paul B. Wickensimer
Clerk of Court**

Circuit Court Division
Greenville County Courthouse
305 East North Street
Greenville, South Carolina 29601
(864) 467-8551 FAX (864) 467-8540

November 13, 2019

Robert M. Watkins, 243803
Q2A 122
Perry Correctional Institution
430 Oaklawn Rd
Pelzer SC 29669

Dear Mr. Watkins:

Enclosed please find a copy of the most recent letter our office received from you. We have forwarded your letter to the Solicitor's Office and to the Administrative Judge for General Sessions. There are no documents in the indictment file that would indicate a disposition of the motions or if they are still pending.

Hope you are doing well and will have a nice Thanksgiving.

Best Regards,

Leanda King
Assistant Clerk of Court

[Faint, illegible text, likely bleed-through from the reverse side of the page]

[Faint, illegible text]

[Faint, illegible text]

Exhibit # 6

The South Carolina Court of Appeals

The State, Respondent,

v.

Robert Max Watkins, Appellant.

Appellate Case No. 2017-001863

ORDER

The appellant included a document with his notice of appeal which he contends is the order on appeal. This document is a letter from the office of the Solicitor to Judge Verdin inquiring whether she would like to set the pending motion for a hearing. Handwritten on the face of the letter is the following: "Denied LHV 5/23/17." Because we cannot discern whether this notation is an indication that the motion is denied or simply a denial of the Solicitor's request to decide the motion without a hearing, this appeal is dismissed without prejudice to allow the circuit court to issue a ruling on the appellant's motion. The remittitur will be sent pursuant to Rule 221(b), SCACR.

H. Bruce Wilkins

_____, J.
FOR THE COURT

Columbia, South Carolina

cc:
Robert M. Watkins, 243803
Elizabeth Coble Major, Esquire
John Benjamin Aplin, Esquire
Alan McCrory Wilson, Esquire
W. Walter Wilkins, Esquire
The Honorable Letitia H. Verdin

FILED

10/9/17 gmc

Robert Watkins 243803 Q2A122
P. Ct.
430 Oaklawn Rd
Pike SC 29469

RECEIVED

NOV 26 2019

SC Court of Appeals

RECEIVED

NOV 22 2019

Jenny Abbott Kitching Clerk of Court SC Court of Appeals
P.O. Box 11629
Columbia SC 29211

SCDC P.C.I. MAILROOM

NOV 30 '19

Legal

COMMISSARY