

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JAN 14 2020

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable J. Cordell Maddox, Jr., Circuit Court Judge

Appellate Case No: 2018-001099

GAVIN V. JONES,

APPELLANT,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

MOTION TO SUPPLEMENT THE RECORD ON APPEAL

Counsel for Respondent hereby moves before this Court to supplement the Record on Appeal, pursuant to Rule 212(b) of the South Carolina Appellate Court Rules. In support of this motion, counsel shows the following:

1. On January 31, 2019, Appellant filed his Designation of Matter.
2. On September 20, 2019, Respondent filed its Designation of Matter after being granted the ability to file out of time and with subsequent extensions.
3. Appellant served Respondent with the Record on Appeal on January 2, 2020. In violation of Rule 210(c), SCACR, Appellant did not include in the Record on Appeal all matter designated by Respondent to be included.
4. Respondent moves before this Court to supplement the Record on Appeal with the matter designated by Respondent to be included: (1) Respondent's Notice of Motion and

Motion to Dismiss Pursuant to Rules 12 and 4, SCRPC and Laches, filed November 19, 2012; and (2) Respondent's Return to Apellant's "Motion to Alter and Amend Judgement Rule 59(E)".

5. Other than through its Designation of Matter, Respondent has not communicated with Apellant about this motion and believes doing so would serve no useful purpose and because Apellant is a pro se party.

WHEREFORE, Respondent prays that this Court will allow Respondent to file an Appendix to the Record on Appeal that includes the aforementioned matter, accept the accompanying Appendix to the Record on Appeal as filed, and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

TAYLOR ZANE SMITH
S.C. Bar. No. 103282
Assistant Attorney General

By: 

Attorneys for Respondent
Post Office Box 11549
Columbia, South Carolina, 29211
(803) 734-3737

January 14, 2020

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Anderson County
The Honorable J. Cordell Maddox, Jr., Circuit Court Judge

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SC Court of Appeals

Appellate Case No. 2018-001099

GAVIN V. JONES,

Appellant,

v.

THE STATE,

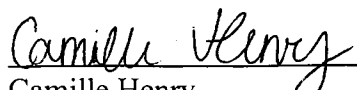
Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the **Motion to Supplement Record on Appeal and Appendix to the Record on Appeal**, has been served upon opposing counsel by mailing two (2) copies in the United States mail, postage prepaid:

Gavin V. Jones, #259726
Perry Correctional Institute
430 Oaklawn Rd Q1B-112
Pelzer, SC 29669

This 14th day of January, 2020


Camille Henry
Legal Assistant for Respondent



ALAN WILSON
ATTORNEY GENERAL

January 14, 2020

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JAN 14 2020
SC Court of Appeals

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

Re: Gavin V. Jones v. State of South Carolina
Appellate Case No. 2018-001099
Lower Court Case No. 2012-CP-04-0861

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of the **Motion to Supplement the Record on Appeal** along with the original and one copy of the **Appendix to the Record on Appeal**. By copy of this letter we are serving Appellant today.

Sincerely,

Taylor Z. Smith
Assistant Attorney General
SC Bar No. 103282

TZS/ch
Enclosures

cc: Gavin V. Jones, Pro Se Appellant
Victim Advocacy Division