



ALAN WILSON
ATTORNEY GENERAL

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S.C. SUPREME COURT

February 25, 2020

The Honorable Daniel E. Shearouse
Clerk of the South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

Re: **Ranata Jones, v. State of South Carolina**
Case No. 2018-CP-42-02769

Dear Mr. Shearouse:

Enclosed for filing is a notice of appeal in the above case. The PCR transcript is being requested on today's date. Enclosed are the following:

1. A copy of the order which is to be challenged on appeal.
2. Proof of service of notice of appeal on the Respondent.

Sincerely,

Chelsey F. Marto
Assistant Attorney General

CFM/my

cc: Susannah C. Ross, Esquire
South Carolina Department of Corrections
Spartanburg County Clerk of Court
Honorable Barry J. Barnette
Office of Appellate Defense
Victim Advocacy Division

STATE OF SOUTH CAROLINA
In The Supreme Court

CERTIORARI TO SPARTANBURG COUNTY
Court of Common Pleas
G. Thomas Cooper, Jr., Post-Conviction Relief Court Judge

Case No. 2018-CP-42-02769

Ranata Jones, Respondent,
v.
State of South Carolina, Petitioner.

NOTICE OF APPEAL

The State of South Carolina appeals the Honorable G. Thomas Cooper, Jr.'s order granting post-conviction relief filed January 27, 2020. The State filed a timely motion to reconsider, alter, or amend pursuant to Rule 59(e), SCRCP, which was denied by Judge Cooper by writing order filed on, and received by Respondent on February 24, 2020. Copies of the order granting post-conviction relief and the order denying the State's motion to reconsider, alter, or amend are attached hereto.


February 25, 2020

Respectfully submitted,

ALAN WILSON
Attorney General

CHELSEY F. MARTO
Assistant Attorney General
S.C. Bar No. 104191

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

By: 
Attorneys for Petitioner

Other counsel of record:
Susannah C. Ross
330 East Coffee St.
Greenville, SC 29601
(864) 242-0029
Attorney for Respondent

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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
In The Supreme Court

CERTIORARI TO SPARTANBURG COUNTY
Court of Common Pleas
G. Thomas Cooper, Jr., Post-Conviction Relief Court Judge

Case No. 2018-CP-42-02769

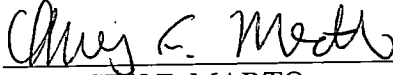
Ranata Jones, Respondent,
v.
State of South Carolina, Petitioner.

PROOF OF SERVICE

I, Chelsey F. Marto, Counsel for the Petitioner, certify that I have today served the within notice of appeal upon the Respondent by depositing a copy of it in the United States Mail, postage prepaid, addressed to his attorney of record:

Susannah C. Ross, Esquire
330 East Coffee St.
Greenville, SC 29601

I further certify that all parties required by Rule to be served have been served this 25th day of February, 2020.



CHELSEY F. MARTO
S.C. Bar. No. 104191
Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737
Attorney for the Petitioner

STATE OF SOUTH CAROLINA
COUNTY OF SPARTANBURG

IN THE COURT OF COMMON PLEAS
SEVENTH JUDICIAL CIRCUIT

RENATA JONES,
APPLICANT.

ORDER GRANTING PETITION FOR
POST CONVICTION RELIEF

v.

THE STATE OF SOUTH CAROLINA,
RESPONDENT.

CASE # 2018-CP-42-2769

This matter comes before the Court by way of application of post conviction relief (PCR) filed August 6, 2018, alleging ineffective assistance of counsel for failure to interview witnesses, prepare for trial, request and present exculpatory evidence, and appeal the case. A Retention was made June 12, 2019. Susannah Ross was appointed as Applicant's counsel August 24, 2018.

An evidentiary hearing was convened October 11, 2019, before this Court at the Spartanburg County Courthouse. Applicant was present and represented by Susannah Ross, Assistant Attorney General, Jacob Isenberg, represented the State. Testimony was presented by the Applicant, Renata Jones; witness, Kimberly Lyles Hughes; and trial counsel, Joshua Schultz.

After a thorough review of the record in its entirety and the testimony and argument presented at the evidentiary hearing, this Courts finds that the Applicant established ineffective assistance of counsel and orders the case be remanded to the court of general sessions for a new trial pursuant to the following authorities: *Cherry v. State*, 300 S.C. 115, 117-18, 386 S.E.2d 624, 625 (1989) (stating in order to establish a claim of ineffective assistance of counsel, a PCR applicant must prove: (1) counsel's performance was deficient, and (2) the deficient performance prejudiced the applicant's case); *Watson v. State*, 287 S.C. 356, 357, 338 S.E.2d 636, 637 (1985)

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("The test for effective assistance of counsel is whether the representation was within the range of competence demanded of attorneys in criminal cases.")

PROCEDURAL HISTORY

The Applicant was indicted by the Spartanburg County Grand Jury for Driving under the Influence (2017-GS-42-2769) arising out of a single vehicle collision on the side of Interstate 85. On November 19, 2016, SCHP responded to an accident at mile marker 67 on northbound Interstate 85. There were three individuals on the scene and all smelled of alcohol. Randall Scott had called 911 and indicated that he was the driver and the Applicant, Renata Jones, was in the front passenger seat. At the scene, Scott told Trooper Elder that he was in the front passenger seat and Applicant, who owned the car, was the driver. However, Scott called Trooper Elder the next day and stated that he was actually driving the car at the time of the accident. The Applicant was tried on August 9, 2017, before the Honorable Robin Stilwell. After a guilty verdict, Ms. Jones was sentenced to eighteen months, suspended to ninety days and probation for two years. Joshua Schultz represented the Applicant and Assistant Solicitors Andrew Miller and Sydni Kallum, Esqs. prosecuted the case. Trial counsel did not file an appeal on behalf of the Applicant.

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SOUTH CAROLINA

SUMMARY OF TESTIMONY PRESENTED AT EVIDENTIARY HEARING

The Applicant testified that she understood that the relief given in PCR was to be put back in the position she was in before the trial. She said that she wished to pursue this PCR for ineffective assistance of counsel because she was innocent and her trial lawyer failed investigate and present exculpatory evidence that would have led to an acquittal at trial. During the evidentiary hearing Ms. Jones testified that she was not driving her car the night of the accident that led to her charge of Driving under the Influence. She stated that her cousin, Randall Scott,

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was driving. She presented a recording of the 911 call Scott made just after the accident in which he states that they had an accident and Ms. Jones was in the passenger seat when the accident occurred. Ms. Jones testified that she was able to get a copy of the 911 call through a FOIA request following her loss at trial. Ms. Jones testified that she told her lawyer that the 911 recording was important, which it was, because at trial the state presented a video of Mr. Scott telling Trooper Elder at the scene that he was a passenger in the car. Ms. Jones stated that the jury had a question during deliberation and asked review Scott's testimony. She stated that the jury's question showed it was a close case and had the jury been able to hear the 911 call and Ms. Hughes' testimony, the outcome of the trial would have been different. She said that Mr. Schultz failed to appeal the loss though she requested that he do so.

Kimberly Lyles Hughes, who was in the back seat of the car at the time of the accident, then testified that the Applicant was not driving at the time of the accident. She admitted that she dozed off at the time of the collision but said that when they left, Mr. Scott had been driving. She stated that she was available and willing to testify at the Applicant's trial but was not interviewed or called by Mr. Schultz.

Trial counsel Joshua Schultz testified that he was retained to represent the Applicant. He said he reviewed the discovery in the case and was prepared for trial. He said that he did not receive the 911 recording in his discovery package. He stated it was ultimately Ms. Jones decision not to testify and he put up no other evidence. He admitted that he did not interview or put up witness Kimberly Lyles Hughes who was in the back seat of the car. He said he thought her testimony would be unconvincing because she was asleep at the time of the accident. He admitted to failing to appeal the case.

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FINDINGS OF FACT AND CONCLUSIONS OF LAW

Strickland v. Washington established a two-prong test for evaluating claims of ineffective assistance of counsel. *Strickland v. Washington*, 466 U.S. 668, 687, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984). The first prong of the test requires that a defendant prove his counsel's deficiency by demonstrating counsel's performance fell below an objective standard of reasonableness. *Bennett v. State*, 371 S.C. 198, 203, 638 S.E.2d 673, 675 (2006) (citing *Strickland*). The second part of the test requires a defendant to show there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different. A reasonable probability is a probability sufficient to undermine confidence in the outcome of the trial. *Johnson v. State*, supra. *Pauling v. State*, 503 S.E.2d 468, 331 S.C. 606 (S.C., 1998)

"[C]riminal defense attorneys have a duty to undertake a reasonable investigation, which at a minimum includes interviewing potential witnesses and making an independent investigation of the facts and circumstances of the case." *Edwards v. State*, 392 S.C. 449, 466 S.E.2d 604 (2011). "[W]hen counsel articulates a valid reason for employing a certain strategy, such conduct generally will not be deemed ineffective assistance of counsel." *Lounds v. State*, 380 S.C. 454, 462, 670 S.E.2d 646, 650 (2008) (emphasis omitted). However, "The validity of counsel's strategy is reviewed under 'an objective standard of reasonableness.'" *Id.* (quoting *Ingle v. State*, 348 S.C. 467, 470, 560 S.E.2d 401, 402 (2002)). *Putnam v. State*, 417 S.C. 252, 789 S.E.2d 594 (S.C. App., 2016)

The crux of Ms. Jones case was whether she or Mr. Scott was driving. At Ms. Jones' trial, Mr. Scott testified that he told Trooper Elder at the scene that he was not driving because he was scared, but that he actually was the driver of Ms. Jones' car when it had the accident. The State objected to testimony that Mr. Scott called Trooper Elder the day after the accident and

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admitted he was driving Ms. Jones' car and that she was in the passenger's seat. (R. p. 49) Mr. Schulz failed to make the reasonable argument that the call was not hearsay because it was being offered to rebut a charge of recent fabrication. (R. p. 56), SCRE 801(d)(1)(B). Though Mr. Schultz proffered the testimony, the jury did not hear it, and his failure to appeal the case prevented appellate review.

At trial the State showed a video at the scene after the accident of Mr. Scott telling Trooper Elder that he was not driving. In that video, a 911 call is referenced, but it was not played for the jury. (R. p. 66). The defense did not put up a case or argue in closing that the 911 tape should have been presented by the state. This left the jury with the false impression that Mr. Scott had denied being the driver all along until he changed his story at Applicant's trial to protect her. This misrepresentation of the facts allowed the State to attack Mr. Scott's credibility with a convincing argument of recent fabrication. The Solicitor said in closing that the video from the scene was compelling and Scott's trial testimony lacked credibility. Evidence of Scott's call the next day and the 911 call would have shown that argument to be false and likely changed the outcome of the case.

Mr. Schultz testified that he did not receive the 911 call through discovery. If Mr. Schultz was not given a copy of the 911 tape, as he should have been under our rules of discovery, reasonable preparation for trial would require Mr. Schultz to review the video presented by the State at trial which references the 911 call. (R. p. 66) Reasonable investigation would require that he question what the 911 call stated and why it was not produced in discovery. Reasonable representation would require he make timely, appropriate motions regarding discovery violations. Had he done so, the outcome of the case would likely have been different. Either the 911 tape would have been provided in discovery and available to be used to rebut the video at the


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scene resulting in Ms. Jones' likely acquittal or, if it was not produced prior to trial pursuant to Brady, the violation would likely result in a dismissal given its exculpatory nature.

I find the first prong of the Strickland test is met. A reasonable investigation would have led to the 911 tape recording which supported Applicant's theory of the case. A reasonable investigation would also require interviewing potential witnesses. Ms. Hughes testified that she was never interviewed by Mr. Schultz. Mr. Schultz testified that he did not have the 911 recording and thought Ms. Hughes' testimony would be unconvincing because he understood she was asleep at the time of the accident. I find that the failure to procure the 911 recording and interview witness Kimberly Lyles Hughes was deficient. *See Edwards v. State*, 392 S.C. 449, 456, 710 S.E.2d 60, 64 (2011). As counsel did not possess the evidence, it is unreasonable that there could be a valid strategic reason for his failure to present it at trial. *See Ingle v. State*, 348 S.C. 467, 470, 560 S.E.2d 401, 402 (2002) I find that the Applicant has further met the second prong of the Strickland test. But for counsel's failure to present favorable evidence along with his failure to make effective evidentiary arguments regarding Scott's subsequent case, Cooper Elder, the jury would likely have acquitted Ms. Jones.

THUS, IT IS THE ORDER OF THIS COURT that the Applicant's sentence and conviction is vacated and her case is remanded to the court of General Sessions.

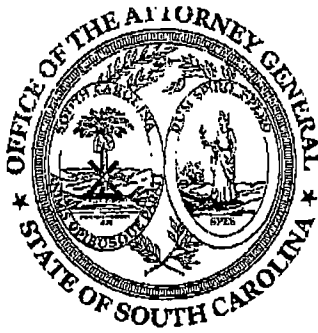
AND IT IS SO ORDERED this 14 day of January, 2019.



Judge G. Thomas Cooper
Presiding Judge

Clauden, South Carolina.

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ALAN WILSON
ATTORNEY GENERAL

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S.C. SUPREME COURT

January 17, 2020

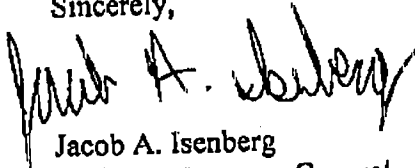
The Honorable Amy W. Cox
Clerk of Court - Spartanburg County
PO Box 3483
Spartanburg, SC 29304-3483

Re: Ranata Jones, v. State of South Carolina
2018-CP-42-02769

Dear Ms. Cox:

Enclosed please find the original **Order Granting Petition for Post-Conviction Relief**, signed by the Honorable G. Thomas Cooper, in the above-captioned case for filing in your office. Please forward a time stamped copy back to our office for our file.

Sincerely,


Jacob A. Isenberg
Assistant Attorney General

JAI/my
Enclosure

cc: Susannah Ross, Esquire

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SPARTANBURG COUNTY
AMY W. COX

STATE OF SOUTH CAROLINA
COUNTY OF SPARTANBURG

Ranata Jones,

Applicant,

v.

State of South Carolina,

Respondent.

IN THE COURT OF COMMON PLEAS
FOR THE SEVENTH JUDICIAL CIRCUIT

Case No.: 2018-CP-42-02769

MOTION TO RECONSIDER, ALTER, OR
AMEND, PURSUANT TO RULE 59(e), SCRPC

Pursuant to Rule 59 (a) and (e) of the South Carolina Rules of Civil Procedure, Respondent would move before this Court for relief as follows:

I. PROCEDURAL HISTORY

This matter comes before the Court by way of an application for post-conviction relief filed by Ranata D. Jones ("Applicant") on August 6, 2018. Respondent submitted its return to the application on June 12, 2019. The Court convened an evidentiary hearing into the matter on October 11, 2019, at the Spartanburg County Courthouse in South Carolina. Applicant was present at the hearing and represented by Susannah Ross, Esquire. Assistant Attorney General Jacob A. Isenberg of the South Carolina Attorney General's Office represented Respondent. At the hearing, Applicant testified on her own behalf and testimony was also presented from Applicant's trial counsel, Joshua Schultz, Esquire ("Counsel"). Following the hearing, this Court requested proposed orders from both parties. Thereafter, this Court adopted Applicant's proposed order and granted post-conviction relief. This order was filed on and received by Respondent on January 27, 2020.

Respondent hereby moves for this Court to reconsider its order granting post-conviction relief pursuant to Rule 59(a) and (e), SCRPC.

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II. REQUEST ADDITIONAL TESTIMONY BE ADDED TO ORDER

In its order granting relief, this Court omitted pertinent testimony from its summary of the testimony elicited at the evidentiary hearing. Accordingly, Respondent requests this Court add the following testimony to its order granting relief to accurately and fully represent what occurred at the evidentiary hearing:

1. Counsel's testimony that he does not customarily utilize statements made by intoxicated individuals in trial strategy. Moreover, Counsel's testimony that he had no plans to use statements from the 911 call because they came from Scott while intoxicated. Finally, Counsel's testimony that his trial strategy was to paint Scott as lying while intoxicated and telling the truth while sober.

2. Counsel's testimony that Hughes had no recollection of stopping a testimony station because she was asleep. Counsel's testimony that he opined her testimony would not be relevant in light of the fact that she had no knowledge of who drove after they left the gas station.

3. All other testimony absent from this Court's final order that were considered in Respondent's attached proposed order of dismissal.

III. REQUEST FOR RECONSIDERATION OF THE GRANT OF RELIEF

In addition to the omitted testimony, Respondent respectfully submits this Court erred as a matter of law in granting relief. Respondent respectfully requests this Court read and review the arguments in support of the denial of the application for post-conviction relief made by Respondent during the evidentiary hearing and in its proposed order of dismissal, which has been attached to and is thereby incorporated into this motion. These errors of law include the following:

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1. The Court conducted an incomplete and insufficient analysis about the admissibility of testimony that was found to be hearsay at Applicant's trial. The Court found Scott's statements, during the 911 call, as non-hearsay under SCRE 801(d) (1) (B). However, the Court did not specify whether these statements were made in response to prior fabrication, improper influence, or improper motive, in light of State v. Jarrell, 350 S.C. 90, 100, 564 S.E.2d 362, 368 (Ct. App. 2002) (holding SCRE 801 (d) (1) (B) is only proper when responding to allegations of recent fabrication, improper influence, or improper motive). Accordingly, Respondent is without sufficient notice of the basis for this Court's finding that the testimony at issue was non-hearsay.

2. This Court overlooked Counsel's valid strategic decision. The validity of Counsel's proffered trial strategy was based upon credibility of testimony and evidence. Counsel's proffered his credibility assessments as valid because concluded statements made intoxicated appeared less credible, and statements made sober appeared more credible. This strategy is valid, in light of Stokes v. State, 308 S.C. 546, 548, 419 S.E.2d 778, 779 (1992) (finding counsel's trial strategy is valid where he or she intentionally decides not to proffer evidence he or she does not believe to be credible).

3. The Court overlooked factual circumstances that made recovering this 911 call impossible and an improper basis for a continuance. The undisputed factual circumstances being that a server issue caused the 911 call to be unavailable throughout the entire duration of Applicant's case. The undisputed testimony being that, to the best of Counsel's knowledge, this 911 call would be unavailable for an

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CIVIL DIVISION

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undetermined period of time. Therefore, Counsel appropriately proffered evidentiary review was not appropriate for a continuance requests where the item was impossible to access for an undeterminable period of time, in light of Skeen v. State, 325 S.C. 210, 481 S.E.2d 129 (1997) (holding an applicant is not entitled to relief where he or she presents no evidence to show how additional preparation would have had any possible effect on the result at trial).

4. The Court overlooked Counsel's reasonable investigation into Hughes. Counsel interviewed Hughes, placed her on the witness list in anticipation for trial, and ultimately concluded she was not relevant. Counsel proffered Hughes fell asleep before they stopped at a gas station. Counsel proffered Hughes was not relevant because she had no knowledge about who drove the vehicle after they left the gas station. Finally, Counsel proffered Hughes did not wake up until after the vehicle crashed. Accordingly, Counsel reasonably investigated Hughes where he determined an inability to determine who was driving, when the vehicle crashed, severely impacted her relevance, in light of Taylor v. State, 404 S.C. 350, 364, 745 S.E.2d 97, 104 (2013) (holding counsel properly investigate a defense to the crime charged when he or she conducts a reasonable investigation).

5. All other matters of law absent from this Court's final order that were considered in Respondent's attached proposed order of dismissal.

IV. CONCLUSION

Respondent asks the Court to reconsider its ruling pursuant to Rule 59(e), SCRPC. Respondent raised several issues in a proposed order of dismissal ignored in the final order granting post-conviction relief. Respondent has attached and is incorporating its proposed order

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SOUTH CAROLINA

of dismissal for review and reconsideration. Respondent requests a hearing with this Court to address these issues. In the alternative, Respondent requests this Court include the above-mentioned testimony, and legal issues, in an amended order granting post-conviction relief.

WHEREFORE, Respondent respectfully requests the Court **GRANT** this motion for reconsideration.

Respectfully submitted,

ALAN WILSON
Attorney General

W. JEFFREY YOUNG
Chief Deputy Attorney General

MEGAN HARRIGAN JAMESON
Senior Assistant Deputy Attorney General

JACOB A. ISENBERG
Assistant Attorney General

By:

Jacob A. Isenberg

ATTORNEYS FOR RESPONDENT
Office of the Attorney General
P.O. Box 11549
Columbia, S.C. 29211

February 6th, 2020

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February 6, 2020

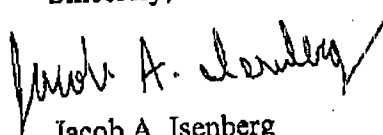
The Honorable Amy W. Cox
Clerk of Court, Spartanburg County
PO Box 3483
Spartanburg, SC, 29304

Re: Ranata Jones v. State of South Carolina
2018-CP-42-02769

Dear Ms. Cox:

Enclosed please find an original Respondent's Motion to Reconsider, Alter, or Amend Pursuant to Rule 59, SCRCP for filing in your office. Please forward me a time-stamped copy back to our office.

Sincerely,



Jacob A. Isenberg
Assistant Attorney General

Enclosures

Cc: Honorable G. Thomas Cooper, Jr.
Susannah Ross, Esquire

STATE OF SOUTH CAROLINA
COUNTY OF SPARTANBURG

IN THE COURT OF COMMON PLEAS
SEVENTH JUDICIAL CIRCUIT

Ranata Jones,

Case No.: 2018-CP-42-02769

Applicant

v.

**ORDER DENYING RESPONDENT'S
59 (e) MOTION TO RECONSIDER,
ALTER, OR AMEND ORDER
GRANTING PETITION FOR
POST CONVICTION RELIEF**

State of South Carolina,

Respondent.

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SPARTANBURG COUNTY
SOUTH CAROLINA

After careful consideration of Respondent's Motion and the record in this case, the Court is unable to discover any material fact or principle of law that either has been overlooked or disregarded and further finds no error of law or facts not appropriately considered. Accordingly, this Court DENIES Respondent's Motion pursuant to Rule 59(e) SCRPC to Reconsider, Alter, or Amend this Court's Order of January 14, 2020, filed January 27, 2020, Granting Applicant's Petition For Post Conviction Relief. Pursuant to Rule 59(f), the Court is of the opinion that oral argument is not necessary.

February 18, 2020



G. Thomas Cooper, Jr.
Presiding Judge



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

G. Thomas Cooper, Jr.
Judge, Active-Retired

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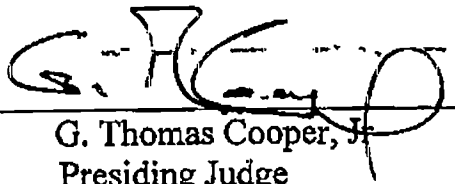
Honorable Amy W. Cox
Clerk of Court, Spartanburg County
PO Box 3483
Spartanburg, SC 29304-3483

Re: Ranata Jones PCR
2018-CP-42-02769

Dear Ms. Cox:

Enclosed for filing is my Order Denying Respondent's Motion to Reconsider. Please return a time stamped copy to me. Thank you.

February 18, 2020


G. Thomas Cooper, Jr.
Presiding Judge

Cc: Jacob Isenberg, Esq.
Susannah Ross, Esq.

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