

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Charleston County  
J.C. Nicholson, Jr., Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**  
**Jun 16 2020**  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JOSEPH LAMAR BROWN, JR.

APPELLANT

APPELLATE CASE NO. 2019-000781

\_\_\_\_\_  
PETITION TO FILE SUPPLEMENTAL RECORD ON APPEAL  
\_\_\_\_\_

Pursuant to Rule 240, SCACR, undersigned counsel requests permission to file a supplemental record on appeal in the above-referenced case. In support of this motion, counsel shows the following:

- 1) Undersigned counsel filed and served the record on appeal in this case on May 27, 2020. Subsequently, undersigned counsel filed an amended record on appeal.
- 2) Upon preparation of the Final Brief of Appellant, undersigned counsel realized she cited Court's Exhibit #4 in her brief, but she had failed to designate it accordingly.
- 3) Contained within Court's Exhibit #4 is the Motion to Dismiss Armed Robbery Indictment as Required by Double Jeopardy Protections. This motion forms the basis

for the first issue on appeal. Therefore, it is a necessary document for review of the issue presented for appellate review.

WHEREFORE, counsel for appellant requests leave to file a supplemental record on appeal in the above-referenced case.

*s/Susan B. Hackett*

Susan B. Hackett  
Appellate Defender

ATTORNEY FOR APPELLANT

June 16, 2020.

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\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

Pursuant to the Supreme Court’s Order “RE: Operation of the Appellate Courts During the Coronavirus Emergency,” dated March 20, 2020, the undersigned hereby certifies a true copy of the Petition to filed a Supplemental Record on Appeal in the above-referenced case has been served upon Caroline Scramton, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), which is [cscrantom@scag.gov](mailto:cscrantom@scag.gov), this 16<sup>th</sup> day of June, 2020.

*s/Susan B. Hackett*

Susan B. Hackett  
Appellate Defender

ATTORNEY FOR APPELLANT



# SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

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Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

June 16, 2020

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

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**SC Court of Appeals**

RE: The State v. Joseph Lamar Brown

Dear Ms. Kitchings:

Enclosed is a copy of the Petition to File a Supplemental Record on Appeal in the above-captioned case. Thank you for your assistance in this matter.

Sincerely,

*s/Susan B. Hackett*

Susan B. Hackett  
Appellate Defender

SBH/kk

Enclosure

cc: Caroline Scrantom, Esquire