

IN THE COURT OF GENERAL SESSIONS
OF THE FOURTH JUDICIAL CIRCUIT

State of South Carolina
County of Charleston, S.C.
Antonio O. SIMMONS, #279418
Petitioner,

-VS-

State of South Carolina, etc.
Clerk of Court
Respondent.

C/A No: Appellate Case No. 2020-000088

NOTICE OF MOTION FOR
SUBPEONA DUCES TECUM
IN CONJUNCTION WITH
DISCOVERY FOR PRODUCTION
AND INSPECTION
OF OFFICIAL RECORDS

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JUL 01 2020

SC Court of Appeals

Now comes the pro-se petitioner, Antonio O. Simmons, #279418
Motion this Honor Able Court of the Fourth
Judicial Circuit in the uniform spirit of interest of
Justice And good Cause; based upon such great burden
of proof standards by the preponderance of evidence;
in regard of the petitioner establishing his entitlement
to his original CLAIMS File and Amended
CLAIMS to Civil Action Number #2020-000088

Petitioner further Assert in this Motion of Sub-
Peona duces tecum of discovery of production And

inspection for this Honorable Court to ISSUACE A
Subpeona duces tecum Administrative order directing
the ASSISTANCE Attorney General one VALARIE CARCIA
GIOVANNI; Pursuant to SCRep; Rule 45 () And in conjunction
with Rule 26(b) And Rule 34 of SCRep; for the
Production And inspection of the below out lined
official records that are in the Control And Possession

(1)

of the respondent; Such inspection of official records that are being requested will aid the petitioner in preparing his entitlement in regard of the petitioner original and amended CLAMS that are already before the court as a matter of law.

Below Subpeona duces tecum discovery of production and inspection of official records.

(A) (1) Petitioner request for the production and inspection for the official records, the December 7 2014 Charleston County grand jury impelment; And the Petitioner December 7 2014 grand jury Minutes transcript of records.

(A) (2) Petitioner request for the production and inspection for the official record; All initials Arrest reports of Sled and Charleston County Sheriff department; Any and all hand written notes, statements, photo pictures, All lab testing done by Sled and Charleston County Sheriff office; Copy of All supplemental reports; Preliminary hearing transcript of records.

(A) (3) Petitioner request for the production and inspection (2) for a copy of all officials records, any and all hospital mental health records, examination, of the examiner mental health finding;

(A) (4) Petitioner request for the production and inspection for the official records; for a copy of all trial plea Brady Discovery File, material that are in the control and possession of the respondents as a matter of law.

This ~~date~~ day

of 29, 2020

(3)

(S) Antonio Simmons
Antonio Orlando Simmons
#279418
Antonio Simmons

IN THE COURT OF GENERAL SESSIONS
OF THE FOURTH JUDICIAL CIRCUIT

State of South Carolina
County of Charleston, S.C.
Antonio O. Simmons #279418
Petitioner

C/A NO: Appellate Case 2020-000088

SUMMON.

-VS-

State of South Carolina, et
Clerk of Court
Respondents.

TO: Valerie Garcia Giovannoli
Assistant Attorney General
You are here by ~~summon to answer~~ this notice of
Motion for A Subpoena duces tecum discovery and
Production and inspection of official records within
thirty days after receipt of such summon and motion;
if there be a failure by the respondent to answer such
summon and motion, the Petitioner will motion the
Court for a pretrial discovery conference hearing pur-
suant to SCRP Rule 16. as a matter of law,

This June, day of 29 2020

Antonio Simmons
Antonio Orlando Simmons
#279418

Antonio Simmons

(4)

IN THE COURT OF GENERAL SESSIONS
OF THE FOURTH JUDICIAL CIRCUIT

State of South Carolina
County of Charleston, S.C.
Antonio O. SIMMONS #279418
Petitioner.

C/A NO: Appellate Case 2020-000088

CERTIFICATE OF SERVICE

-VS-

State of South Carolina; et
Clerk of Court
Respondent.

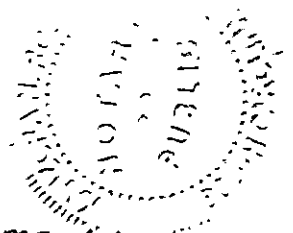
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JUL 01 2020
SC Court of Appeals

I, Antonio O. Simmons, hereby Certify that I PLACE in
U.S. Postage MAIL on JUNE 29 2020 A notice of
Motion for A Subpeona duces tecum of discovery
And production of inspection of official records
Along with A Symmon upon the respondent to be
Secure upon the Clerk of Court office and Attorney
General office at the last know Address;
Sworn, before me this day 20 June 2020, of

Danzera Robinson

Notary Public

My Commission Expires 8/5/2024



Antonio Simmons
Antonio Orlando Simmons
#279418
Antonio Simmons

Date 6/29/2020

TO: Jenny Abbot Kitchings

Can you please Filed
This Motion OR Approve
This Motion. And send
me back A Copy please
in the Name of GOD.

Antonio O. Simmons # 279418

Broad River C.I.,
4460 Broad River Rd,
Columbia, S.C. 29210
Marion 162 room

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JUL 01 2020

SC Court of Appeals

Can you Filed this at the Court
OR Approve this motion at the
Court of Appeals or put the on
Filed. or send me back A copy please.

Thank you.

ANTONIO SIMMONS # 211718
Broad River C.I.
4460 Broad River Rd.
Columbia, S.C. 29210
Marion 162

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JUL 01 2020

SC Court of Appeals

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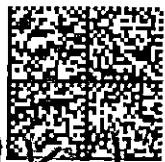
JUN 29 2020

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JUN 29 2020

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Jenny Abbot Kichings
Clerk of Court
S.C. Court of Appeals
PO Box 11629
Columbia, S.C. 29211

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Local Mail