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Jul 22 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of General Sessions
The Honorable R. Keith Kelly

Case No.: 2019-001571

State of South Carolina,

Respondent,

vs.

Rajshun Bernard Foster,

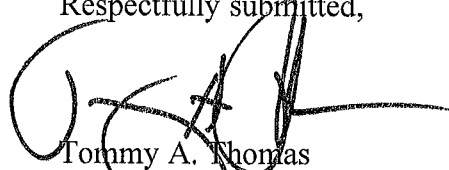
Appellant.

MOTION TO SUPPLEMENT THE RECORD ON APPEAL

That the Appellant, through Counsel, would respectfully request that he be allowed to supplement the Record on Appeal to include.

Pages 143 and 293 of the Transcript that were missing from the original Record on Appeal.

Respectfully submitted,



Tommy A. Thomas
Attorney for Appellant
P.O. Box 88
Irmo, SC 29063
(803) 732-5507

July 21, 2020

STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of General Sessions
The Honorable R. Keith Kelly

Case No.: 2019-001571

State of South Carolina,

Respondent,

vs.

Rajshun Bernard Foster,

Appellant.

SUPPLEMENTAL
RECORD ON APPEAL

TOMMY A. THOMAS
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ATTORNEY FOR APPELLANT

MELODY J. BROWN
Senior Assistant Deputy Attorney General
P.O. Box 11549
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ATTORNEY FOR RESPONDENT

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SC Court of Appeals

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TRANSCRIPT PAGES 143 AND 2931

1 don't do much fool with them because I'm sixty-five years
2 old.

3 Q. Right.

4 A. And I don't do much fooling with them young kids
5 because I can't hang out with them and I can't do the things
6 they do, so I just stay with my distance from them.

7 Q. Yes.

8 A. They come by, they speak to me, I speak to them. Other
9 than that, that's all I know.

10 Q. Fair enough. Thank you, ma'am.

11 A. You are very welcome.

12 THE COURT: Yes, ma'am.

13 MS. RACINE: Thank you, Your Honor.

14 May it please the court?

15 CROSS EXAMINATION BY MS. RACINE:

16 Q. Hey, Ms. Dowdle. I just got a couple of follow-up
17 questions for you, okay?

18 A. Yes, ma'am.

19 Q. When Ms. Leskanic was questioning you, you said that --
20 or she asked you what kind of tone Rajshun had when he was
21 asking about "Slick". I believe you said his tone was
22 normal and not angry, is that right?

23 A. He didn't seem like it to me. You all would have to
24 ask him, because it didn't seem like it to me. He just
25 asked me have I seen him and this and that, and other than

1 careful.

2 Mr. Foreman, ladies and gentlemen of the jury, I
3 was told at break that Mr. Anthony would be the last witness
4 for today. With that we are going to be releasing you a
5 little bit early.

6 Don't talk about the case. Don't go home and try
7 to find out anything about the case, or learn anything.
8 Don't use computers to do that. And then tomorrow we report
9 back and we will start at nine a.m. tomorrow. Nine a.m.
10 tomorrow. So get here sometime before nine, maybe a quarter
11 'til. The courthouse opens at 8:30. You would be able to
12 get in by 8:30. I will already be here. The lawyers will
13 already be here. I'm going to -- I'm going to get some more
14 of that coffee in the morning. I hope you got some this
15 morning, because it's good, but I will be here in the
16 morning about 8:10, something like that. The lawyers will
17 be here about close to that. You get here, come 8:30 to
18 8:45, something like that. Use the facilities, get yourself
19 situated and we will go to work at nine a.m. tomorrow
20 morning.

21 Mr. Foreman, if you will take the jury out.

22 (The following takes place outside the presence of
23 the jury panel)

24 THE COURT: Anything from the State?

25 MS. LESKANIC: No, sir.

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Case No.: 2019-001571

State of South Carolina,Respondent

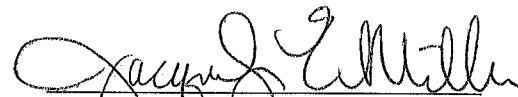
vs.

Rajshun Bernard Foster,Appellant.

CERTIFICATE OF SERVICE

I, Jacquelyn E. Miller, Paralegal to Tommy A. Thomas, Attorney for the Appellant hereby certify that emailed, a copy of a Motion to Supplement the Record on Appeal and Supplemental Record on Appeal to:

MELODY J. BROWN
Senior Assistant Deputy Attorney General
P.O. Box 11549
Columbia, SC 29211-1549
mbrown@scag.gov



Jacquelyn E. Miller, Paralegal to
Tommy A. Thomas, Esq.
Attorney for Appellant
P.O. Box 88
Irmo, SC 29063
(803) 732-5507

July 21, 2020

Jackie Miller

From: Jackie Miller
Sent: Tuesday, July 21, 2020 4:32 PM
To: mbrown@scag.gov
Subject: Rajshun Foster
Attachments: foster.supplementroa.pdf

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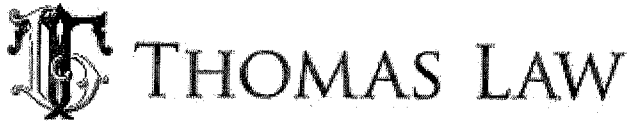
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SC Court of Appeals

Attached please find a Motion to Supplement the Record and the Supplemental Record. Your assistance let us know that there were two pages missing. Sorry about that!!

Jackie Miller

Paralegal to Tommy Thomas, Esq.



Tommy A. Thomas, PC

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THOMAS LAW

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SC Court of Appeals

July 22, 2020
VIA EMAIL

V. Clare Allen, Deputy Clerk
S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

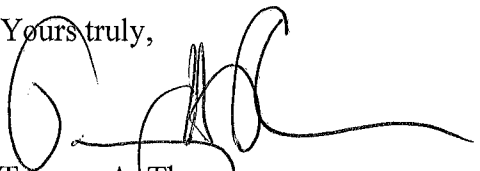
RE: State v. Rajshun B. Foster
Appellate Case No.: 2019-001571

Dear Sir or Madam:

Attached please find for filing a Motion to Supplement the Record on Appeal, the Supplemental Record on Appeal along with a Certificate of Service by email.

Please feel free to contact me should you have any questions.

Yours truly,



Tommy A. Thomas,
Attorney at Law

TAT/jem
cc: Melody Jane Brown, Esq. via email

TOMMY A. THOMAS, P.C.

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