

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Cherokee County
Honorable Robin B. Stilwell, Circuit Court Judge

Case No. 2017-001777

RECEIVED

AUG 17 2020

SC Court of Appeals

Alonzo Columbus Jeter, III,

PETITIONER,

v

STATE OF SOUTH CAROLINA,

RESPONDENT.

MOTION TO EXPAND SCOPE OF
COURT'S ORDER DUE TO
EXTENUATING AND EXTRAORDINARY
CIRCUMSTANCES

Petitioner, Alonzo C. Jeter, III, pro se, respectfully motions this Court that it would expand the scope of the Court's Order dated September 21, 2018.

Petitioner seeks that this Order of the Court be expanded in scope so as to allow the Division of Appellate Defense to provide Petitioner copies of opinions and other needed documents so as to allow and assist Petitioner by printing and providing documents to Petitioner.

Petitioner has recently sought assistance of the Division of Appellate Defense that it would provide copies of opinions as Petitioner provided specific correct case citations for. However, this request was denied as the Division of

Appellate Defense declined to do so stating Petitioner's request was beyond the scope of the Court's September 21st, 2018, Order.

EXTENUATING AND EXTRAORDINARY CIRCUMSTANCES

Petitioner informs this Court that he has had no access to the institution's law library for performing any legal research or study since February 19, 2020. This is because the institution's computers, which is the only source available for performing legal research, has been inoperable since that time. (See Affidavit of South Carolina Department Of Corrections - Tiger River Correctional Institution's Library Media Specialist, Pamela Sloss, dated August 5, 2020, (attached)).

Further, Petitioner informs this Court that Tiger River Correctional Institution is the most impacted correctional institution in the State of South Carolina with regard to COVID-19 infections resulting from the COVID-19 pandemic. This has further crippled Petitioner from research and study and therefore the ability to effectively advance his issues of the case.

EXPANSION OF SCOPE OF ORDER

Specifically, Petitioner intends to further substantiate his case and its merits. Petitioner seeks to challenge the constitutionality of statute, seek preliminary injunction, and preserve records which were sought in this case at PCR evidentiary hearing by motion for discovery which was denied at PCR evidentiary hearing. Petitioner would seek to ensure the records, etc are preserved as this case

issue regarding the denial of discovery, and other matters are adjudicated by this Court.

Petitioner does, however, understand his request to expand may be construed to seem unreasonably broad if limitations are not put in place. It is for this reason, Petitioner would seek that he is allowed a 200 page limit, which would allow flexibility that Petitioner would receive his needed documents, in order to file meaningful pleadings. (See also S.C. Code Ann. § 17-27-60 as Petitioner is indigent).

For further clarity, Petitioner would not seek copies of the pleadings when they are drafted as Petitioner will do the necessary service and filing of the pleadings. However, this would not bar Petitioner from receiving the already granted assistance of the Division of Appellate Defense with regard of briefs and appendix if the filed Petition for Writ of Certiorari were granted.

CONCLUSION

WHEREFORE, Petitioner prays this Court would grant this motion and expand the Courts prior Order due to the above stated extenuating and extraordinary circumstances, in the interest of fairness.

Respectfully submitted,


Alonzo C. Jeter, III
PETITIONER/prase

Tyger River Correctional Institution
200 Prison Road
Eneoree, South Carolina 29335

This 12th day of August, 2020.

James Bates (C005367)

From: Pamela Sloss (C059571)
Sent: Wednesday, August 5, 2020 9:33 AM
To: James Bates (C005367); Jonathan Nance (C026656)
Subject: Law Library Computers

The law library computers have been down since February 19, 2020. Since then, the Covid-19 pandemic state of emergency has taken place in South Carolina, and the law library computers are still down as of August 5, 2020.

Pamela Sloss
Library Media Specialist
Tyger River Correctional

Sent from my Verizon, Samsung Galaxy smartphone.

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Clerk of Court to Cherokee County
Honorable Robin B. Stilwell, Circuit Court Judge

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SC Court of Appeals

Case No. 2017-001777

Alonzo Columbus Jeter, III,

PETITIONER,

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have served the Motion To Expand Scope Of Court's Order Due To Extenuating And Extraordinary Circumstances, on Respondent by placing a copy of the same within a postage prepaid envelope, and placing the same in the hands of Tiger River Correctional Institution's mail room personnel on this 16th day of August, 2020, for mailing via the United States Mail, addressed as follows: V. Henry Gunter, Esquire, Assistant Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia SC. 29211-1549.

Sworn and Subscribed before me
this 16th day of August, 2020

Daniel E. Boney
Notary Public for South Carolina
My Commission Expires: 1/31/20

SI [Signature]
Alonzo C. Jeter, III
PETITIONER/prose

Tiger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335

SC Code Ann. § 26-1-10 et. seq.
Matter of Celsor, 330 SC 497, 499 SE2d 809 (1998)



August 12, 2020

Alonzo C. Jeter, III, #282902
Tyger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335

The Honorable Jenny Kitchings
Clerk, SC Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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AUG 17 2020

RE: Alonzo C. Jeter, III, v State of South Carolina SC Court of Appeals
Appellate Case No. 2017-001777

Dear Honorable Clerk:

Enclosed for filing, please find the Motion To Expand Scope Of Court's Order Due To Exenuating and Extraordinary Circumstances, along with Certificate of Service for the same.

Please also find, enclosed, one additional copy of these said documents along with a self-addressed stamped envelope. Please return to me, file-stamped copies of these documents by way of the provided SASE.

Thank you for your assistance in this matter.

Sincerely, 

Alonzo C. Jeter, III

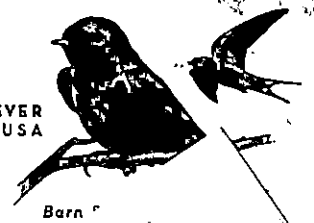
Hlonzo C. Jeter, III, #282702
Tyger River Correctional Institution
200 Prison Road
Enoree, South Carolina 29335

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SC Court of Appeals
The Honorable Jenny Kitchings
Clerk, SC Court of Appeals
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Columbia, SC 29211

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