

RECEIVED

STATE OF SOUTH CAROLINA

Oct 23 2020

IN THE SUPREME COURT

S.C. SUPREME COURT

Appeal from Lexington County

Honorable Eugene C. Griffith, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

TIMOTHY RAY JONES, JR.

APPELLANT

**DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

Appellant proposes the following be included in the Record on Appeal:

- (1) True-billed indictment(s)
- (2) Entire transcript of trial held April 29-June 13, 2019
- (3) **All pretrial transcripts**, including:
- (4) Pretrial hearing held December 13, 2017
- (5) Pretrial hearing held January 5, 2018
- (6) Pretrial hearing held May 25, 2018
- (7) Pretrial hearing held December 19, 2018
- (8) Pretrial hearing held January 11, 2019
- (9) Pretrial hearing held January 31, 2019
- (10) Pretrial hearing held February 4, 2019
- (11) Pretrial hearing held March 11-14, 19, 2019
- (12) Pretrial hearing held April 11, 2019
- (13) Exhibits from trial held April 29-June 13, 2019:
- (14) State's Exhibit #177 (Photo-Knee)
- (15) State's Exhibit #211 (Nahtahn Body Recovery Photo)
- (16) State's Exhibits #211A-211D (Photos-Nahtahn)
- (17) State's Exhibit #212 (Autopsy-Eli)
- (18) State's Exhibit #212A (Photo-Eli)
- (19) State's Exhibit #212B (Photo-Eli)
- (20) State's Exhibit #212C (Photo-Eli)

- (21) State's Exhibit #213 (Autopsy-Merah)
- (22) State's Exhibit #213A (Photo-Merah)
- (23) State's Exhibit #213B (Photo-Merah)
- (24) State's Exhibit #214 (Autopsy-Gabriel)
- (25) State's Exhibit #214A (Photo Body-Gabriel)
- (26) State's Exhibit #214B (Photo Shirt-Gabriel)
- (27) State's Exhibit #214C (Photo Slipper-Gabriel)
- (28) State's Exhibit #214D (Photo Journal-Gabriel)
- (29) State's Exhibit #214E (Photo Diaper-Gabriel)
- (30) State's Exhibit #214G (Photo Body-Gabriel)
- (31) State's Exhibit #215 (Autopsy Abigail)
- (32) State's Exhibit #215A (Photo Body-Abigail)
- (33) State's Exhibit #215B (Photo Body-Abigail)
- (34) State's Exhibit #216 (Autopsy Nahtahn)
- (35) State's Exhibit #216A (Photo Body-Nahtahn)
- (36) State's Exhibit #216B (Photo Body-Nahtahn)
- (37) State's Exhibit #216C (Photo Elbow-Nahtahn)
- (38) Defendant's Exhibit #1 (Travis Snyder CV-Court's 78)
- (39) Defendant's Exhibit #2 (Imaging-Imgen)
- (40) Defendant's Exhibit #3 (Slide – T. Jones)
- (41) Defendant's Exhibit #131 (Report-Dr. Aghardar)
- (42) Defendant's Exhibit #132 (Report-Dr. Aghardar)
- (43) Defendant's Exhibit #135 (CD Dr. Bigler-Images)
- (44) Defendant's Exhibit #136 (Vitae Dr. Bigler)
- (45) Defendant's Exhibit #137 (PowerPoint)
- (46) Defendant's Exhibit #362 (Genogram One)
- (47) Defendant's Exhibit #363 (Genogram Two)
- (48) Court's Exhibit #63 (Witness list)
- (49) Court's Exhibit #64 (Three types of jurors form)
- (50) Court's Exhibit #83 (Defendant's Requested Preliminary Instruction)
- (51) Court's Exhibit #88 (Defense 132-Appendix Dr. Agharkar)
- (52) Court's Exhibit #89 (Defense 131-Report of Dr. Agharkar)
- (53) Court's Exhibit #90 (Video-Cynthia Turner)
- (54) Court's Exhibit #94 (Forensic Evaluation)
- (55) Court's Exhibit #95 (CV – Dr. Frierson)
- (56) Court's Exhibit #99 (Deborah Grey social history)
- (57) Court's Exhibit #100 (CV Julie Dorney, MD)
- (58) Court's Exhibit #102 (Forensic Evaluation)
- (59) Court's Exhibit #103 (Forensic Psychiatry)
- (60) Court's Exhibit #104 (Dr. Kruse Testing)
- (61) Court's Exhibit #106 (Defense Request Jury Charges)
- (62) Court's Exhibit #120 (Dr. Maddox report)
- (63) Court's Exhibit #121 (Genogram)
- (64) Court's Exhibit #122 (Adriana Flores CV)
- (65) Court's Exhibit #123 (Affidavit A. Flores)

- (66) Court's Exhibit #124 (Interpretive Consideration)
- (67) Exhibit from pretrial hearing held January 31, 2019:
- (68) Defendant's Exhibit #1 (Letter 1/6/2017)
- (69) Exhibit from pretrial hearing held March 11-14, 19, 2019:
- (70) Court's Exhibit #13 (Affidavit-C. Johnson)
- (71) Ex Parte Petition for Certificate to Produce Material Witness and Documents from Out of State dated March 28, 2019
- (72) Ex Parte Certificate Regarding Out of State Witness dated April 1, 2019
- (73) Emergency Petition for Court Order Allowing Videotaped Testimony of Cynthia Granado Jones Turner, filed May 8, 2019
- (74) Order that Cynthia Granado Jones Turner submit to a videotaped interview, dated May 9, 2019
- (75) Motion to Voir Dire Potential Jurors Regarding the Consequence of Not Guilty by Reason of Insanity and Guilty But Mentally Ill and for Jurors to Be Instructed as to the Consequence of a Verdict of Not Guilty by Reason of Insanity and Guilty But Mentally Ill filed April 11, 2019.
- (76) Supplement to Motion to Voir Dire Potential Jurors Regarding the Consequence of Not Guilty by Reason of Insanity and Guilty But Mentally Ill and for Jurors to Be Instructed as to the Consequence of a Verdict of Not Guilty by Reason of Insanity and Guilty But Mentally Ill filed April 24, 2019
- (77) Motion for Constitutionally Adequate Voir Dire filed April 25, 2018
- (78) Motion to Suppress Evidence and Fruits from Unlawful Roadblock, filed April 12, 2018
- (79) Death Notice and Order filed December 9, 2015

I certify that this designation contains no matter which is irrelevant to this appeal.

October 23, 2020.

s/ Robert M. Dudek
Robert M. Dudek
Chief Appellate Defender

South Carolina Commission on Indigent
Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589
(803) 734-1330

ATTORNEY FOR APPELLANT