

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Dec 09 2020

SC Court of Appeals

Appeal from Horry County Court of Common Pleas
The Honorable William H. Seals, Circuit Court Judge

Appellate Case No. 2018-000054

Theodore Wills Jr.,.....Petitioner,

v.

State of South Carolina,.....Respondent.

MOTION TO AMEND APPENDIX AND ACCEPT FOR FILING

NOW COMES Petitioner Theodore David Wills, by and through undersigned counsel, and would respectfully move this Honorable Court to allow for amendment to the appendix and accept for filing the Amended Appendix, Brief of Petitioner, and Motion for Order for Transportation attached hereto.

The appendix filed with the Supreme Court along with the petition for writ of certiorari in this case contained many pages with underlined items or notes done by hand, as Counsel had received from the Petitioner. The Amended Appendix attached to this Motion contains previously published pages of the trial transcript that are more legible than that previously

included. The missing page of the murder indictment from the prior appendix and the *Miranda* Advisement form, a trial exhibit, have been added to the Amended Appendix. Undersigned Counsel contacted Assistant Attorney General Chelsey Marto last week regarding amendments to the appendix. Ms. Marto graciously consented to the aforementioned amendments.

Filing this motion as well as the other attached pleadings this day arose from an pdf pagination difficulty, unexpected personal issue, and other caseload. Counsel submits that good cause exists for amending the appendix and accepting for filing out of time the pleadings attached to this motion.

WHEREFORE Counsel for Petitioner respectfully urges this Honorable Court to allow the Appendix to be Amended and accept the pleadings for filing.

Respectfully Submitted,

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