

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

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Appellate Case No. 2018-000054

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

v.

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

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**MOTION FOR TRANSPORTATION OF EXHIBIT**

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**COUNSEL FOR PETITIONER**

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NOW COMES Petitioner, Theodore Wills Jr., by and through undersigned counsel, and moves this Honorable Court to order the transportation of State's Exhibit 21, a copy of the recording of Petitioner's proffer statement to law enforcement admitted into evidence and played at trial. The inclusion of Exhibit 21 would complete the lower court record before this Court and Counsel respectfully submits that this Court's opportunity to review the exhibit in conjunction with the materials contained in the Appendix is necessary for thorough consideration of issues raised in the Brief of Petitioner.

WHEREFORE Petitioner prays for this Honorable Court to issue an Order of Transportation for State's Exhibit 21.

Respectfully submitted,

WILLIAM G YARBOROUGH III

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By: /s/ Lauren C. Hobbis

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