STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Lexington County

The Honorable William P. Keesley, Circuit Court Judge

THE STATE,

Respondent,

v.

MICHAEL LARONE WILLIAMS,

Appellant.

Appellate Case No. 2019-001759

INITIAL BRIEF OF RESPONDENT

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

MICHAEL D. ROSS
Assistant Attorney General
S.C. Bar No. 73986

South Carolina Office of the Attorney General
P.O. Box 11549
Columbia, South Carolina 29211
(803) 734-6307

ATTORNEYS FOR RESPONDENT

TABLE OF CONTENTS

APPELLANT'S STATEMENT OF ISSUES ON APPEAL

Whether the trial court erred in excluding evidence that the decedent had methamphetamine in his blood, where a bag was discovered by police at the scene of the shooting, which contained numerous items associated with the manufacture of methamphetamine, but police ignored the evidence and did not collect it, which was central to Appellant's defense.

RESPONDENT'S COUNTERSTATEMENT OF ISSUES ON APPEAL

Whether the circuit court abused its discretion in finding that the probative value of the victim's toxicology results was substantially outweighed by the danger of unfair prejudice, confusion of the issues, and misleading the jury.

STATEMENT OF THE CASE

In November 2017, the Lexington County Grand Jury charged Michael Larone Williams (appellant) with murder and possession of a firearm during the commission of a violent crime. (2017-GS-32-036889 and 036889). The State alleged that appellant shot and killed Kevadric Pressley (victim). (2017-GS-32-03688). The case proceeded to trial on October 7, 2019, before the Honorable William P. Keesley. (Tr. 1). Attorneys Robert Madsen and Kebra Simpson represented appellant at trial. (Tr. 1). The Attorney General's Office prosecuted the case. (Tr. 1).

After a four day trial, the jury found appellant guilty as charged on both indictments. (Tr. 507, l. 5-15). The court sentenced appellant to life in prison.[1] (Tr. 513, l. 20). This appeal follows.

[1] Appellant was on probation at the time of the offense for an unrelated conviction for assault and battery in the first degree. (Tr. 509, l. 22-25; 510, l. 1; 511, l. 21-24). The circuit court revoked his probation in full and ordered the sentence to run concurrently with the murder conviction. (Tr. 514, l. 5-6).

STATEMENT OF FACTS

Murder of Kevadric Pressley

Deputy Daniel Schirra was on patrol with the Lexington County Sheriff's Department on Thanksgiving Day 2016. At 2:04 pm, he received a report of shots fired on Harmony Church Lane in Gaston, South Carolina. (Tr. 203, l. 8-15; 239, l. 4-17). Harmony Church Lane is a small, dirt road in rural Lexington County that connects two larger thoroughfares near their intersection. (Tr. 239, l. 16-17; St. Ex. 4). On one end of the road is a residence, and on the other, Harmony Church. (Tr. 239, l. 13-17; St. Ex. 4). Within minutes, Deputy Schirra arrived on scene. (Tr. 205, l. 18). He immediately found a Chevy Impala that had been driven into an embankment on the side of the road. (Tr. 241, l. 11-18). The driver, twenty-one year old Kevadric Pressley (victim), was slumped over the steering wheel. (Tr. 253, l. 21-22). His foot was still pressed against the gas pedal, and the car was running. (Tr. 261, l. 20-21; 262, l. 7). The victim's sixteen year old brother, Nakerrius Pressley (brother), was pacing in the road, repeatedly saying, "they smoked my brother." (Tr. 241, l. 18-24).

The victim had been shot on the left side of his head. (Tr. 242, l. 19). Although paramedics responded quickly, they found no signs of life. (Tr. 253, l. 8; 255, l. 1-17). An autopsy would confirm the cause of death was a gunshot wound to the head. (Tr. 449, l. 7-8). According to the pathologist, the bullet entered above the victim's left ear, went straight through the brain, and exited the other side. (Tr. 447, l. 13-24). Due to the victim's braided hairstyle, the pathologist could not determine how far away the weapon had been fired from the victim's head. (Tr. 448, l. 18-25; 449, l. 1-2).

The victim's brother testified that an individual named Dayyan Felder contacted him earlier that day to buy some marijuana. The brother had known Dayyan since elementary school and

regularly sold marijuana to him. (Tr. 208, l. 8-9). Like the brother, Dayyan was sixteen years old. (Tr. 270, l. 4). When Dayyan arrived to buy the marijuana, appellant was with him. (Tr. 209, l. 2). The brother had never seen appellant before in his life. (Tr. 209, l. 14). In contrast to the other two, appellant was in his late twenties. (Tr. 271, l. 9-10). During the ensuing marijuana deal, appellant mentioned he had some brand new guns he wanted to sell. (Tr. 210, l. 3). The brother declined the offer, and appellant drove away with Dayyan. (Tr. 210, l. 4-6).

About an hour later, appellant returned with Dayyan to buy more marijuana. (Tr. 210, l. 7-8). According to the brother, appellant offered to trade a gun for the marijuana and some money. (Tr. 210, l. 14-15). The brother accepted that offer, but appellant did not have any bullets for the gun. (Tr. 210, l. 16). To finalize the deal, they decided to drive to appellant's house to get bullets. (Tr. 210, l. 19-22). As they were pulling out of the driveway, the victim arrived. (Tr. 211, l. 4-5). He told his little brother to get in his car because they had to go eat Thanksgiving dinner. (Tr. 211, l. 12-14). The two would follow appellant and pick up the bullets on their way to dinner. (Tr. 211, l. 12-13).

On the way to his house, appellant took the shortcut onto Harmony Church Road. (Tr. 211, l. 17). He stopped his car in the middle of the road, and the victim pulled up along the passenger side. (Tr. 214, l. 12-13). The victim handed the marijuana to Dayyan, who was sitting in the front passenger seat. (Tr. 211, l. 21-22). Appellant then unexpectedly drove down the dirt road, turned around, and came back towards the victim's car. (Tr. 211, l. 23-24; 214, l. 17). Although the victim and his brother did not know what appellant was doing, Dayyan texted them "to pull around the curve, that everything is going through him." (Tr. 214, l. 24-25; 215, l. 1). Reassured about the situation, the victim pulled up to the driver's side of the car to give appellant the money. (Tr. 215, l. 6-9). As the victim reached out the window, appellant appeared to be handing over the gun

and a box of bullets. (Tr. 215, l. 10-16). But that was just a trick. Instead of completing the deal, appellant fired one shot into the victim's car. (Tr. 215, l. 15-16). The brother could feel the bullet whiz by him after it passed through the victim's brain. (Tr. 219, l. 2-3). Law enforcement would recover a bullet from inside the front passenger door of the victim's car. (Tr. 398, l. 1-4).

Dayyan corroborated the brother's account. He testified that one of his friends wanted marijuana that morning, so he called appellant. (Tr. 272, l. 10-13; 273, l. 18-23). In exchange for brokering these kind of deals, appellant would give Dayyan marijuana or some money. (Tr. 272, l. 13-16). When appellant ran of marijuana later on that day, Dayyan called the victim's brother to buy some. (Tr. 273, l. 23-25; 274, l. 1-4). The brother was a regular source of marijuana for Dayyan. (Tr. 270, l. 12-17). Appellant and Dayyan drove to the brother's house, purchased marijuana from him, and left to sell it to various customers. (Tr. 276, l. 21-25; 273, l. 1). Appellant ultimately ran out of marijuana again and asked Dayyan to call the brother a second time. (Tr. 277, l. 2-3).

Upon arriving at the brother's house a second time, appellant offered to trade a gun for the marijuana and a small amount of money. (Tr. 277, l. 14-16). The victim's brother agreed to the deal, but appellant did not have the weapon in his car. (Tr. 276, l. 2-3). They had to drive to appellant's house to get it. (Tr. 278, l. 3). By that time, the victim had arrived. (Tr. 277, l. 22-25). The victim and his brother would follow appellant to pick up the gun. (Tr. 278, l. 5).

When appellant turned on Harmony Church Lane, he told Dayyan to put a box of bullets on the dashboard because they would "do half the transaction there." (Tr. 278, l. 15-16). At appellant's direction, the victim pulled up and tossed the marijuana into the car. (Tr. 278, l. 14-24). To Dayyan's surprise, appellant "just pulls off" after receiving the marijuana. (Tr. 278, l. 21). Nevertheless, before reaching the end of the dirt road, appellant turned back around. (Tr.

279, l. 9-11). As they approached the victim's car, appellant reached down and grabbed a gun. (Tr. 279, l. 17-20). He fired one shot into the victim's car as he passed by. (Tr. 279, l. 19). Dayyan tried to open the car door to get away, but appellant told him to stay in the car. (Tr. 279, l. 20-21). Shortly thereafter, he dropped Dayyan off and warned "you ain't seen nothing." (Tr. 280, l. 14). Appellant fired one shot in the air and drove away. (Tr. 280, l. 14-15).

After hearing these two eyewitness accounts, law enforcement began looking for appellant. (Tr. 308, l. 7-11). The search continued late into the evening, leading officers to the home of appellant's girlfriend. (Tr. 309, l. 3-10). She too lives in rural Lexington County. (Tr. 309, l. 2-19). As officers were speaking to her outside the residence, appellant pulled into the driveway. (Tr. 327, l. 2-7). The officers identified themselves, prompting appellant to turn the car around and flee the scene. (Tr. 327, l. 20-25). A high speed chase ensued, which ended when appellant crashed into a tree. (Tr. 329, l. 5-14).

Despite wrecking the car, appellant got out and continued to flee on foot. (Tr. 329, l. 23-24). Fortunately for law enforcement, a canine team arrived to assist before the dust could even settle from the wreck. (Tr. 337, l. 12-17). The dog found appellant hiding in the backyard, not far from the crash. (Tr. 337, l. 24-25). Along the path between the wreck and appellant, an officer found a .45 caliber handgun. (Tr. 360, l. 13-20; 366, l. 10-13). It appeared "freshly placed" in that there was no dirt on it. (Tr. 362, l. 22-24). Ballistic testing would match this firearm to the bullet recovered from the victim's car and a shell casing found in the car driven by appellant. (Tr. 441, l. 15-17; 442, l. 8-9). Additionally, officers would find a box of .22 caliber bullets and marijuana inside the vehicle that appellant wrecked. (Tr. 366, l. 6; 397, l. 2-5).

Exclusion of Toxicology Results

At trial, an investigator testified that the area surrounding the victim's car on Harmony Church Lane was secured with crime scene tape. (Tr. 261, l. 15). Approximately one hundred yards from the crime scene, investigators observed a bag in the road. (Tr. 266, l. 4-5). According to one investigator, the bag "appeared to have been there longer than that day." (Tr. 266, l. 8-9). Inside the bag were ingredients to make methamphetamine, such as Sudafed. (Tr. 266, l. 5-20). Because investigators believed the bag was unrelated to the murder investigation, they called a narcotics officer to collect it. (Tr. 266, l. 10-16; Tr. 402, l. 21-22). Law enforcement did not attempt to lift fingerprints or collect DNA from the bag. (Tr. 266, l. 24).

Appellant would point to this bag in an attempt to elicit testimony from the pathologist that the victim's toxicology results indicated the presence of methamphetamine. (Tr. 450, l. 4-9; 451, l. 1-12). When the State objected, appellant replied that he was not trying to show the victim "was under the influence" or was a "bad person." (Tr. 450, l. 18-19; 453, l. 9). Rather, the victim's positive toxicology results would reinforce the bag "was evidence that law enforcement just ignored." (Tr. 450, l. 20-21). In other words, "there might be a little bit more going on here." (Tr. 451, l. 7-8).

The circuit court excluded the victim's toxicology results under Rule 403. (Tr. 453, l. 17). In assessing the merits of the objection, the court noted that it was "struggling" to see how the positive test was relevant. (Tr. 453, l. 14). Furthermore, even if the presence of methamphetamine was relevant in casting doubt on law enforcement's investigation, the court ruled "it should be excluded under Rule 403 because any probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues and misleading the jury." (Tr. 453, l. 16-20). Nevertheless, the court permitted appellant to make a proffer outside the presence of the jury. (Tr. 453, l. 23). It is unclear from the proffer whether the pathologist tested the victim's blood, urine,

or other substance. (Tr. 454, l. 1-24). Additionally, the pathologist shed no light on when the drug was ingested or how much was consumed. (Tr. 454, l. 1-24).

STANDARD OF REVIEW

The standard of review for the exclusion of evidence under Rule 403 is abuse of discretion. State v. Tallent, 430 S.C. 438, 448, 845 S.E.2d 438, 514 (Ct. App. 2020). "An abuse of discretion occurs when the trial court's ruling is based on an error of law or, when grounded in factual conclusions, is without evidentiary support." State v. Hawes, 423 S.C. 118, 126, 813 S.E.2d 513, 517 (Ct. App. 2018)(quoting State v. Black, 400 S.C. 10, 16, 732 S.E.2d 880, 884). In applying this standard, appellate courts "are obligated to give great deference to the trial court's judgment" and should reverse "only in exceptional circumstances." State v. Collins, 409 S.C. 524, 534, 763 S.E.2d 22, 28 (2014)(quoting State v. Adams, 354 S.C. 378, 580 S.E.2d 785, 794 (Ct. App. 2003)).

ARGUMENT

I. The Circuit Court Acted Within Its Discretion In Excluding The Victim's Toxicology Results Under Rule 403 Because The Probative Value Was Substantially Outweighed By The Danger Of Unfair Prejudice, Confusion Of The Issues, And Misleading The Jury.

Relevant evidence is anything that makes "the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence." Rule 401, SCRE. Even if relevant, "evidence may be excluded if its probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury." Rule 403, SCRE. To understand the probative value of the contested evidence, courts "must consider what was practically in dispute at trial." State v. Phillips, 430 S.C. 319, 327, 844 S.E.2d 651, 655 (2020). On the other side of the equation, "[u]nfair prejudice is the tendency of the evidence to suggest a decision based on something other than the legitimate probative force of the evidence." Id. at 328, 844 S.E.2d at 656. As applied here, the circuit court acted within its discretion under Rule 403 in finding that the probative value of the evidence, if any, was outweighed by its prejudicial effect.

Appellant takes this Court on windy road in arguing that the toxicology results make any consequential fact more or less probable. See Rule 401, SCRE. According to appellant, the toxicology results connect the victim to the bag law enforcement found one hundred yards away. (App. Brief 10). By connecting the victim to the bag, appellant believes there could be "more to the story" than what the two eyewitnesses provided at trial. (App. Brief 12). One is forced to speculate what that "something" is because neither eyewitness was questioned about the bag at trial. Additionally, appellant believes the toxicology results reinforce that law enforcement should have conducted additional forensic analysis on the bag to identify its owner. (App. Brief 11). Had law enforcement done so, the results may have shown the two eyewitness accounts do not add up.

The problem with appellant's reasoning is that the toxicology results do not connect the victim to the bag. As discussed above, law enforcement found the bag approximately one hundred yards from the taped-off crime scene. (Tr. 266, l. 4-5). The initial responding officer did not even see it when he arrived to render aid and secure the scene. (Tr. 246, l. 24-25). Additionally, the physical condition of the bag indicated that no one involved in this case left it there. To the contrary, investigators assessed that it "appeared to have been there longer than that day." (Tr. 266, l. 8-9). The bag had no distinctive characteristics, such as an identification card or nametag, to connect it to anyone involved in the case. Furthermore, nothing in the testimony of the two eyewitnesses suggests the bag is related to this murder. In fact, the two eyewitnesses were never asked any questions about the bag. Therefore, because the bag has no connection to the case, the victim's positive toxicology result does not render any consequential fact any more or less likely. See Rule 401, SCRE.

A simple analogy may assist the Court. Consider a traffic stop for suspected driving under the influence. One hundred yards away, the officer finds a rusty beer can on the side of the road. Later on, a breathalyzer test reveals the driver has alcohol in his system. The positive breathalyzer test does not connect the driver to the rusty beer can found on the road one hundred yards away. The same logic would apply here. Like the rusty beer can, the presence of this discarded bag on the side of the road is simply a coincidence. As such, the circuit court rightfully found the positive toxicology results had little, if any, probative value.

Furthermore, "the probative value of any particular bit of evidence is obviously affected by the scarcity or abundance of other evidence on the same point." State v. James, 355 S.C. 25, 35, 583 S.E.2d 745, 750 (2003)(quoting Old Chief v. United States, 519 U.S. 172, 185). To the extent the toxicology results would have shown there was something "more to the story" or

discredited law enforcement's investigation, appellant was able to do so through other means. Several officers testified about the bag and its contents. (Tr. 246, l. 22-25; 266, l. 1-24; 402, l. 11-22). The crime scene investigator conceded on cross-exam that it was not subjected to fingerprint or DNA analysis to identify the owner. (Tr. 266, l. 21-25). He further conceded that a narcotics officer collected the bag and disposed of it. (Tr. 266, l. 10-24). In other words, appellant was able to articulate his arguments without referring to the victim's toxicology results.

In contrast to the minimal probative value of this evidence, there was a substantial danger of unfair prejudice, confusion of the issues, and misleading of the jury. See Rule 403, SCRE. Simply put, the victim's positive methamphetamine test would have been an inflammatory distraction. The jury might have rendered its verdict based on its assessment of the character or lifestyle of the victim—not the evidence supporting the elements of murder. The circuit court wisely did not put the jury in that position. The risk of unfair prejudice, confusion of the issues, and misleading the jury would have substantially outweighed any probative value under Rule 403.

Appellant discounts the prejudicial nature of this evidence, noting that the jury had already heard evidence of the victim's involvement in the marijuana deal. (App. Brief 12-13). According to appellant, the "entire case was about drugs." (App. Brief 12). But equating marijuana with methamphetamine is akin to comparing apples and oranges. The social stigma, violence, and health risks surrounding methamphetamine are qualitatively different than marijuana. The General Assembly has recognized the distinction by providing harsher punishments for methamphetamine than marijuana. Compare S.C. Code Ann. § 44-53-370 with S.C. Code Ann. § 44-53-375. As such, appellant's argument carries little weight.

The circuit court's ruling also aligns with relevant precedent in this state. As appellant recognizes, in State v. Washington, 424 S.C. 374, 818 S.E.2d 459 (Ct. App. 2019)(*overturned on*

other grounds 431 S.C. 394, 848 S.E.2d 779 (2020)), the defendant was charged with shooting another man in the parking lot of a nightclub. At trial, he attempted to introduce the victim's toxicology results, which revealed a blood alcohol content of .235. The defendant argued the toxicology results were relevant in showing the victim's decreased sensitivity to pain, lowered inhibitions, a tendency to overreaction, and aggressive or violent behavior. Id. at 404-05, 818 S.E.2d at 475. The trial court refused to admit the evidence under Rule 403. After his conviction, the defendant claimed that the ruling was an abuse of discretion.

This Court rejected that argument, noting that there was no evidence in the record that the victim was the aggressor. Rather, the evidence demonstrated that the defendant followed the victim to the parking lot and struck the first blow. Id. at 406, 818 S.E.2d at 476. Additionally, the Court held it was "mere speculation" to conclude the victim's intoxication would have affected his behavior as the defendant claimed. Id. To the contrary, the pathologist testified that she could not predict the victim's behavior from his blood alcohol content. Id. As such, the minimal probative value of the toxicology results was substantially outweighed by the danger of unfair prejudice. Id. In reaching this conclusion, the Court also noted that the defendant was able to offer evidence of the victim's intoxication through other evidence, specifically witness testimony that he had been drinking that night. Id.

Appellant argues that this case is different because unlike Washington "there was a strong correlation" between the toxicology results and the bag. (App. Brief 11). But as discussed above, there was no correlation here, only coincidence. Like the situation in Washington, connecting the victim's toxicology results to this bag would involve "mere speculation." Id. The Rules of Evidence require more. Accordingly, this case does not present any exceptional circumstances warranting reversal. See Collins, 409 S.C. at 28, 763 S.E.2d at 534 ("A trial judge's decision

regarding the comparative probative value and prejudicial effect of evidence should be reversed only in exceptional circumstances.")(quoting State v. Adams, 354 S.C. 378, 580 S.E.2d 785, 794 (Ct. App. 2003)). The State would respectfully ask that the circuit court's ruling be affirmed on appeal.

II. Even If The Circuit Court Should Have Allowed The Introduction Of The Victim's Toxicology Results, Such Error Is Harmless.

As the Court is aware, some errors "are so insignificant and inconsequential they do not require reversal of a conviction." State v. Reyes, Op. No. 28004 (S.C. Sup. Ct. filed Dec. 16, 2020)(Shearhouse Adv. Sh. No. 49 at 17). If a reviewing court is satisfied beyond a reasonable doubt that the error did not contribute to the guilty verdict, then the conviction should be affirmed under a harmless error analysis. State v. Tapp, 398 S.C. 376, 389-90, 728 S.E.2d 468, 475 (2012). "Whether an error is harmless depends on the circumstances of the particular case. No definite rule of law governs this finding; rather, the materiality and prejudicial character of the error must be determined from its relationship to the entire case." Reyes, Op. No. 28004 (S.C. Sup. Ct. filed Dec. 16, 2020)(Shearhouse Adv. Sh. 49 at 17)(quoting State v. Mitchell, 286 S.C. 572, 573, 336 S.E.2d 150, 151 (1985). In conducting this analysis, courts often consider whether the "defendant's guilt has been conclusively proven ... such that no other rational conclusion can be reached." Id. (quoting State v. Collins, 409 S.C. 524, 538, 763 S.E.2d 22, 29-30 (2014).

Even if the circuit court erred in its evidentiary ruling, appellant's conviction should be affirmed because any error is harmless. Had the jury learned that the victim's toxicology results indicated the presence of methamphetamine, its verdict would have been the same. Simply put, the toxicology report does not undermine either the two eyewitness accounts or law enforcement's investigation. Recall that when law enforcement found the victim, he had a bullet wound to the left side of the head, he was slumped in the vehicle, and his foot pressed against the gas pedal. (Tr.

242, l. 19; 253, l. 21-22; 262, l. 7). The car was still running and had been driven into an embankment. (Tr. 261, l. 18-23). According to the pathologist, the bullet entered above the victim's left ear, went straight through his brain, and exited the other side. (Tr. 447, l. 13-24). Law enforcement recovered a bullet from the front passenger door. (Tr. 398, l. 1-4). Later on that evening, appellant fled from the police and was found in possession of the murder weapon. (Tr. 360, l. 13-20; 441, l. 15-17; 442, l. 8-9)

These facts leave no room for "something more to be going on." Toxicology report or not, the only rational conclusion from this evidence is that appellant murdered the victim as the two eyewitnesses testified. Accordingly, even if this Court finds error in the evidentiary ruling, such error is harmless.

CONCLUSION

For the foregoing reasons, the State respectfully asks that appellant's convictions and sentence be affirmed.

Respectfully submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY J. BROWN
Senior Assistant Deputy Attorney General

MICHAEL D. ROSS
Assistant Attorney General
S.C. Bar No. 73986

By: _____
Michael D. Ross
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211
(803) 734-6307

ATTORNEYS FOR RESPONDENT

January 13, 2021

RECEIVED
Jan 13 2021
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County
Honorable William P. Keesley, Circuit Court Judge

THE STATE,

Respondent,

v.

MICHAEL LARONE WILLIAMS,

Appellant.

Appellate Case No. 2019-001759

CERTIFICATE OF SERVICE

I, Donna D'Alessio, as an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Initial Brief of Respondent, Designation of Matter, and Certificate of Service have been forwarded to Appellant's counsel, Adam S. Ruffin, Esq., via email today, January 13, 2021 to afuffin@sccid.sc.gov and to Mr. Ruffin's assistant, Scott Leveretts, sleverett@sccid.sc.gov.

I further certify that all parties required by Rule to be served have been served.

This 13th day of January, 2021.

Donna D'Alessio, Legal Assistant to:
Michael D. Ross
Office of Attorney General
P. O. Box 11549
Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT

Donna D'Alessio

From: Donna D'Alessio
Sent: Wednesday, January 13, 2021 5:36 PM
To: 'aruffin@sccid.sc.gov'
Cc: 'sleverett@sccid.sc.gov'
Subject: Williams, Michael Larone - Appellate Case No. 2019-001759 - Initial Brief of Respondent, Designation of Matter and Certificate of Service
Attachments: Williams, Michael L. - Appellate Case No. 2019-001759 - Initial Brief of Respondent 1-12-21 (02467000xD2C78).pdf

Dear Mr. Ruffin:

Attached is a scanned copy of the Initial Brief of Respondent, Designation of Matter, and Certificate of Service regarding the above matter. The Initial Brief and supporting documents are being submitted to the South Carolina Court of Appeals through e-filing, along with a copy of this email.

Hope you are well, and thank you.

Donna D'Alessio, Legal Assistant
Capital Litigation
Office of the Attorney General
State of South Carolina
Post Office Box 11549
Columbia, South Carolina 29211-1549
DDAlessio@scag.gov
(803) 734-6305
(803) 734-4035 – Fax
(803) 734-1494 – Direct Line