

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

Certiorari to Abbeville County

Honorable L. Casey Manning, Circuit Court Judge

KEITH DENVER TATE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2020-000496

SUPPLEMENTAL APPENDIX

LARA M. CAUDY
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ATTORNEYS FOR RESPONDENT

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Janell Gregory

From: Yates Brown <ybrown@greenwoodsc.gov>
Sent: Wednesday, September 4, 2019 4:38 PM
To: Janell Gregory
Subject: Fwd: Keith Tate

2019 OCT 13 AM 10:30
CLERK OF COURT
1

----- Forwarded message -----

From: Janna Nelson <jnelson@pdgreenwood.com>
Date: Wed, May 14, 2014 at 11:52 AM
Subject: Keith Tate
To: <lsheek@greenwoodsc.gov>, <wchappell@greenwoodsc.gov>, <ybrown@greenwoodsc.gov>

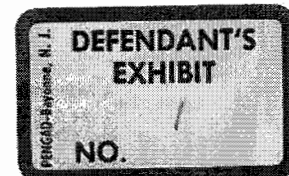
Lance, I know you're in trial in Laurens, but I have a few questions about the discovery in the Tate case. Would you please contact me when you're available? This has to do with the notes the alleged victim wrote, so Windy or Yates, if it's something one of you could help me with, that would be great, too.

Also, I'm not sure if I ever got a definite answer on whether you'd accept a plea to one count with a negotiated 6-year cap. It would have to be an Alford plea, which I don't think Judge Hocker would have a problem taking. I can't swear that Mr. Tate would take that, but the last time we talked, he did ask me if that was on the table so I just want to make sure I ask about it.

Thanks,

Janna Nelson
Circuit Defender
8th Judicial Circuit
864.229.9505 (office)
803.414.7657 (cell)

--
C. Yates Brown, Jr.
Deputy Solicitor
Eighth Judicial Circuit Solicitor's Office



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Greenwood, SC 29648-0516
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Janna Nelson

From: Isheek@greenwoodsc.gov
Sent: Tuesday, May 20, 2014 9:19 AM
To: Janna Nelson
Cc: Yates Brown; Windy Chappell
Subject: State v. Tate

Janna:

I would be willing to encourage the victims to accept a ten year plea in this case if your client is agreeable. I have not run that by the victim yet. If you are interested I will talk to them. Let me know.

Sent from my iPhone=

CLERK OF COURT
MAY 20 10 30 AM '14

PERCIBI Response No. 1
DEFENDANT'S EXHIBIT
NO. 2

Janna Nelson

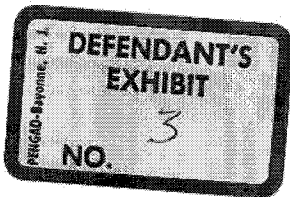
From: Isheek@greenwoodsc.gov
Sent: Tuesday, May 20, 2014 10:43 AM
To: Janna Nelson
Cc: Windy Chappell; Yates Brown
Subject: State v. Tate

Janna:

After discussion with the solicitor, I can offer to dismiss 9 counts of CSC in return for a plea to one count straight up.

Sent from my iPhone=

2019 OCT 18 AM 10:31
CLERK OF COURT



Janna Nelson

From: lsheek@greenwoodsc.gov
Sent: Tuesday, May 20, 2014 12:07 PM
To: Janna Nelson
Subject: Re: State v. Tate

We can do an Alford since he is getting a benefit from the plea.

Sent from my iPhone

> On May 20, 2014, at 11:02 AM, "Janna Nelson" <jnelson@pdgreenwood.com> wrote:

>
> I'll communicate it. It would need to be an Alford plea. Are you
> going to give me a hard time about that if he chooses to take it?

>
> Janna

> -----Original Message-----

> From: lsheek@greenwoodsc.gov [<mailto:lsheek@greenwoodsc.gov>]
> Sent: Tuesday, May 20, 2014 10:43 AM
> To: Janna Nelson
> Cc: Windy Chappell; Yates Brown
> Subject: State v. Tate

>
> Janna:

> After discussion with the solicitor, I can offer to dismiss 9 counts
> of CSC in return for a plea to one count straight up.

> Sent from my iPhone=
>

2019 OCT 18 AM 10:31
CLERK OF COURT
JENNIFER HANAHAN

DEFENDANT'S EXHIBIT
NO. 4