

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

**RECEIVED**

**Mar 26 2021**

S.C. SUPREME COURT

Appeal from Horry County

Honorable Robert E. Hood, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JEROME JENKINS, JR.

APPELLANT

APPELLATE CASE NO. 2019-001280

MOTION TO FILE AMENDED  
INITIAL REPLY BRIEF OF APPELLANT

Counsel for Jerome Jenkins, Jr. respectfully requests to file an amended Initial Reply Brief of Appellant in the above-captioned case, pursuant to Rule 209, SCACR. In support of this motion, counsel shows:

1. The Initial Reply Brief of Appellant was e-filed with this Court, and served on respondent on the morning of Thursday, March 25, 2021.
2. Counsel has been trying to obtain a copy of the state's motion to make the defendant a safekeeper from all available sources. On the afternoon of Thursday, March 25, 2021, the Clerk of Court for Horry County kindly forwarded a copy of the Motion to Rescind Safekeeping Order and Release Defendant to County Detention Center and attachments (filed October 17, 2018).

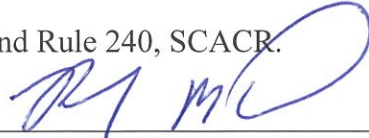
3. Undersigned counsel has simultaneously moved in a separate motion to amend his designation to include the Motion to Rescind Safekeeping Order and Release Defendant to County Detention Center and attachments (filed October 17, 2018). Counsel also moved to delete the state's motion to make the defendant a safekeeper from his original designation since it appears no such motion was ever filed, and that appellant was made a safekeeper by way of other correspondence.

4. Counsel now moves to amend his initial reply brief of appellant to include reference to the Motion to Rescind Safekeeping Order and Release Defendant to County Detention Center and attachments (filed October 17, 2018) in issue #6 at page 24 of the amended initial reply brief of appellant. No other part of that initial reply brief is affected.

5. The amended initial reply brief of appellant is being simultaneously filed with this motion.

6. Opposing counsel, William Edgar Salter, III, has kindly consented to this motion to amend the initial reply brief.

WHEREFORE, the undersigned counsel respectfully requests the Court grant counsel's request to file an amended Initial Reply Brief of Appellant in the above-captioned case, as stated above, pursuant to Rule 209 (a), and Rule 240, SCACR.



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Robert M. Dudek  
Chief Appellate Defender

Kathrine H. Hudgins  
Appellate Defender

Adam Sinclair Ruffin  
Appellate Defender

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

ATTORNEYS FOR APPELLANT

March 26, 2021