

**RECEIVED**  
**May 05 2021**  
**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Sumter County  
Honorable George M. McFaddin, Circuit Court Judge  
Appellate Case Tracking No. 2019-001234

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The State,

Respondent,

vs.

Pedro A. Grado Torresshaw,

Appellant.

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**RETURN TO MOTION FOR PRODUCTION  
OF DOCUMENTS AND THINGS**

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Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

The undersigned received Appellant's *pro se* Motion for Production of Documents and Things on May 4, 2021. The motion was not filed through counsel, David Alexander. "There is no constitutional right to hybrid representation either at trial or on appeal." Jones v. State, 348 S.C. 13, 14, 558 S.E.2d 517, 517 (2002); see State v. Stuckey, 333 S.C. 56, 57-58, 508 S.E.2d 564, 564 (1998) (finding there is no right to hybrid representation under either the United States or the South Carolina constitutions and refusing to consider substantive documents not submitted through counsel). As a result, this Court should not consider the Motion.

Further, this case is currently pending on appeal from a conviction in General Sessions, but it appears all requests are made pursuant to the discovery provisions of the South Carolina Rules of Civil Procedure which would be inapplicable. As a result, the motion is not properly before this Court.

Finally, because this case is pending on appeal, the Record is based entirely on the evidence and filings made in the trial court. As a result, copies of any necessary documents or exhibits likely can be obtained pursuant to whatever procedures are in place with the Sumter County Clerk of Court. In the alternative, he may be able to obtain copies of any evidence, exhibits, filings or other items from his trial or appellate counsel.

WHEREFORE, Respondent prays that the Court deny the Motion for Production of Documents and Things; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Senior Assistant Deputy Attorney General

BY: 

William M. Blich, Jr.  
Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

May 5, 2021

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The State,

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**PROOF OF SERVICE**

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I, Caroline Collins, certify that I have served Return to Motion for Production of Documents and Things on Appellant by emailing Appellant's counsel of record, David Alexander, at his primary email listed with the Attorney Information System (AIS) and by having a copy delivered in the U.S. mail to Appellant at the below address:

Pedro A.G. Torresshaw 380821  
Broad River Correctional Institute  
4460 Broad River Road  
Columbia, South Carolina 29210

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

This 5<sup>th</sup> day of May, 2021.



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CAROLINE COLLINS  
Administrative Coordinator  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727

## Caroline Collins

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**From:** Caroline Collins  
**Sent:** Wednesday, May 5, 2021 4:07 PM  
**To:** 'David Alexander (dalexander@sccid.sc.gov)'  
**Cc:** Matthews, Lindsey; William Blich  
**Subject:** The State v. Pedro A. Grado Torresshaw (2019-001234)  
**Attachments:** TORRESSHAW Pedro - Cover Letter - Return to Motion for Production of Documents and Things - 2019-001234 (02562602xD2C78).PDF; TORRESSHAW Pedro - Return to Motion for Production of Documents and Things - 2019-001234 (02562601xD2C78).PDF

Good Afternoon Mr. Alexander,

Attached please find a copy of the Return to Motion for Production of Documents and Things in The State v. Pedro A. Grado Torresshaw (2019-001234), and it's cover letter. These documents will be submitted to the South Carolina Court of Appeals today via the AIS One Drive System.

If you will, please reply to confirm receipt.

Thank you!

*Caroline Collins*

Administrative Coordinator  
South Carolina Attorney General's Office  
P: (803) 734-3723



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**May 05 2021**

**SC Court of Appeals**

ALAN WILSON  
ATTORNEY GENERAL

May 5, 2021

The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: State v. Pedro Torresshaw  
Case Number 2019-001234

Dear Ms. Kitchings:

I am filing a Return to the pro se Motion for Production of Documents and Things filed in the above reference case. I have provided a copy of the Motion to Appellant's counsel through email, and have also served both Appellant and his counsel separately with the Return. I appreciate your consideration of this matter and, if you need anything further, do not hesitate to contact me.

Sincerely,

William M. Blich, Jr.  
Senior Assistant Deputy Attorney General

Enclosures

cc: David Alexander, Esquire (via email)  
John P. Meadors, Esquire  
Michael Routzong, Esquire  
James C. Campbell, Clerk of Court Sumter County