

RECEIVED

Aug 23 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM ANDERSON COUNTY
Court of General Sessions

R. Lawton McIntosh, Judge

Appellate Case No. 2017-002011

Case Number: 2016A05324

State of South Carolina,

Respondent,

v.

Jason Franklin Carver,

Appellant.

**ADDENDUM TO THE PETITION FOR REHEARING
AND SUGGESTION FOR REHEARING *EN BANC***

COMES NOW, JASON CARVER, Appellant, and hereby submits this Addendum to his Petition for Rehearing and Suggestion for Rehearing *En Banc*, duly filed with this Honorable Court on August 16, 2021.

On page 7 of his Petition for Rehearing, Appellant discussed how Woodrow Curry was arrested at Gambrell's house, where drugs were found. Curry admitted the drugs were his. Curry was charged with possession of drugs (C.A. 2016A2330202932) and drug trafficking (C.A. No. 2016A2330202933 on April 26, 2016, and April 8, 2016, respectively in Greenville County. In the meantime, Curry was charged with murder in Anderson County. He entered a plea bargain with the Solicitor's Office for the lesser offense of Voluntary Manslaughter. The proceedings for the plea bargain took place on August 22, 2017, where the Solicitor's Office requested for a

deferral of his sentencing until after Appellant's trial.

12. MS. MOORE: Judge, before you is Woodrow
13. Walter Curry. He Is pleading guilty on indictment
14. number 2017-GS-04-1648 on the charge of Voluntary
15. Manslaughter. He's represented by Jen Byford and
16. The State is asking that we defer sentencing until
17. after Jason Carver's trial.

(R., p. 791, 12.17).

In Anderson County, Curry killed an unarmed man for pushing him, yet was allowed to plead to voluntary manslaughter. The Solicitor, in her respectful request to defer Curry's sentence until after Jason Carver's trial, fell a bit short of how long she needed to keep the anvil over Curry's head. In fact, Curry would not be sentenced until November 6, 2018, or after Curry had completed his work for the Solicitor (getting the conviction of James Gambrell). It should be noted in the affidavit provided by Curry, following the conclusion of the litigation surrounding the incident of March of 2016, he stated he understood from the Solicitor and lead detective fifteen (15) years was a possible sentence depending on how the trials went. Curry said when it came to the actual sentencing, the State's prosecution did nothing to lobby for a reduction in his sentence. They mouthed words which comprised of one sentence.

Based on the fact Curry had pled guilty; and provided the only evidence in Carver's conviction of his complicity, Greenville County dismissed both the possession charge and the trafficking charge, despite his admission the drugs were his. (Exhibit 1-Greenville Public Index). A trafficking conviction would have been detrimental to Curry's freedom, given his prior record. (Exhibit 2-Greenville Public Index). The dismissal of the drug charges on October 30, 2017, was roughly two months after Carver's conviction, presumably for a job well done. Had the jury been aware of Curry's aspect of the bargain he received for his testimony they would have been unable to be blind to the direct relationship between his altered testimony from one trial to the

next. Of course, the Solicitor's unilateral decision to defer Curry's sentencing until Gambrell's conviction (over fourteen (14) months after Appellant's trial) would seemingly have struck the common juror as morally reprehensible. It seems apparent the State led Curry to believe his "bargain" was directly related to the results of the trials held for Carver and Gambrell. His testimony is indicative of this conclusion.

On page 25 of the Petition for Rehearing, Appellant quoted the following:

A number of out-of-state courts have censured bargains conditioned upon a witness's agreement to testify in a particular manner and have overturned the resulting convictions on both due process and policy grounds. (*People v. Medina*, 41 Cal. App. 3d 438,455, 116 Cal. Rptr. 133, 145 (1974) ("[A] defendant is denied a fair trial if the prosecution's case depends substantially upon accomplice testimony and the accomplice witness is placed, either by the prosecution or the court, under a strong compulsion to testify in a particular fashion.").

The case of *People v. Medina*, has been cited as an example of a contingent plea agreement in the article *Toward a Level Playing Field: Challenges to Accomplice Testimony in the Wake of United States v. Singleton*. (James W. Haldin, *Toward a Level Playing Field: Challenges to Accomplice Testimony in the Wake of United States v. Singleton*, 57 Wash. & Lee L. Rev. 515 (2000), <https://scholarlycommons.law.wlu.edu/wlulr/vol57/iss2/7/>)

On page 25-26 of the Petition, the cases of *United States v. Fricke*, 684 F.2d 1126, 1130 (5th Cir. 1982), cert. denied, 460 U.S. 1011 (1983); *United States v. Goodwin*, 625 F.2d 693, 703 (5th Cir. 1980); and *United States v. Hammond*, 598 F.2d 1008, 1013 (5th Cir. 1979), were cited as examples of cases where prosecutor's attempts to influence the witness' testimony is considered as due process rights violation. These cases were cited in a law article entitled *Accomplice Testimony Under Contingent Plea Agreements*. (Yvette A. Beeman, *Accomplice Testimony Under Contingent Plea Agreements*, 72 Cornell L. Rev. 800 (1987) accessed at

<https://scholarship.law.cornell.edu/clr/vol72/iss4/5/>).

In Appellant’s trial, the prosecution’s case against Appellant was based on accomplice testimony. The accomplice witnesses were compelled to testify in a “particular fashion”. The deference in sentencing provided the State with the opportunity to hold a golden carrot in front of Curry to “coax” him into conjuring up beneficial facts for the first time at two different trials. The Court compelled Gambrell to testify in the “particular fashion” of silence by overwhelming him with the danger of testifying. (R.605-609, 8.12).

Ironically, the Court was so certain Gambrell would not testify, he stated that if he chose to testify, “...we will bring the jury out.” (R. 595, 6.12). The Court proceeded to question Gambrell and his counsel, with an abundantly clear objective of preventing Gambrell’s testimony. (R. 595-598, 13.21). When it became obvious Gambrell would testify, the Court did not “bring the jury out”. Thankfully, Gambrell had a conscience.

CONCLUSION

Appellant respectfully submits this Addendum to give this Court a more comprehensive narrative of the events that led to Curry’s testimony, and its inconsistencies, which Appellant knows is the only reason he was found guilty.

Respectfully submitted by:

s/Donald L. Smith

Donald L. Smith (SC Bar#6699)

122 N. Main Street

Anderson, SC 29621

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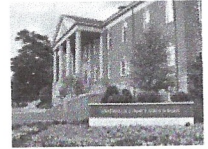
attorneydonaldsmith@gmail.com

Attorney for Appellant

Anderson, South Carolina
August 23, 2021.



Greenville County 13th Judicial Circuit Public Index



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State of South Carolina vs Woodrow Walter Curry

Case Number:	2016A2330202933	Court Agency:	Greenville General Sessions	Filed Date:	04/08/2016
Case Type:	Criminal-Clerk	Case Sub Type:			
Status:	Dismissed	Assigned Judge:	Cagle, Diane Day	Disposition Judge:	Solicitor
Disposition:	Dismissed - Prosecutorial Discretion				
Disposition Date:	10/30/2017	Date Received:	04/07/2016	Arrest Date:	04/05/2016
Law Enf. Case:	16-57535	True Bill Date:	08/29/2017	No Bill Date:	
Prosecutor Case:		Indictment Number:	2017GS2305439	Waiver Date:	
Probation Case:					

Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
<input checked="" type="checkbox"/> Curry, Woodrow Walter	108 E. Morgan St. Greenville SC 29611	White	M	1971	Defendant		10/30/2017
<input type="checkbox"/> Downey, M H	4 Mcgee Street Greenville SC 29601				Officer		04/08/2016
<input type="checkbox"/> Monts, Joyce Krolak	Greenville Cnty. Courthouse 305 E. North St., Ste. 325 Greenville SC 29601				Solicitor		07/03/2017
<input checked="" type="checkbox"/> Sullivan, C. Timothy Jr.	PO Box 2543 Greenville SC 29602				Public Defender		04/19/2016

Charges

Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Curry, Woodrow Walter	0278-Drugs / Trafficking in cocaine, 10 g or more, but less than 28 g - 1st offense	0278-Drugs / Trafficking in cocaine, 10 g or more, but less than 28 g - 1st offense	10/30/2017

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Curry, Woodrow Walter	Tracking Sheet	Filing		10/30/2017-16:37		
Curry, Woodrow Walter	True Bill Indictment	Filing		08/29/2017-11:19		
Curry, Woodrow Walter	Pre-File	Filing		07/03/2017-16:10		
Curry, Woodrow Walter	Motion/Motion for Bond/Bail	Filing		04/14/2016-16:19		
Curry, Woodrow Walter	Checklist	Filing		04/08/2016-10:31		
Curry, Woodrow Walter	Warrants	Filing		04/08/2016-10:31		

Financials

Summary

Fine/Costs:	\$0.00	Total Paid for fine/costs:	\$0.00	Balance Due:	\$0.00
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Costs

Description	Cost Code	Amount	Charge Action	Disbursed Amount
State Assessment	STAASM	\$0.00		\$0.00
Fine to State 44%	AFINES	\$0.00		\$0.00
Victim Services Asm 38.0013% / 5.7831%	ASMVIC	\$0.00		\$0.00
Victim Conviction Surcharge \$100 / \$25	CVSRCH	\$0.00		\$0.00
Law Enforcement Funding Surcharge \$25	LEFSUR	\$0.00		\$0.00
PCC Surcharge	PCCSUR	\$0.00		\$0.00
SC Criminal Justice Academy Training	SCCJAT	\$0.00		\$0.00
Fine to General Fund	AFNEGF	\$0.00		\$0.00

Payments

Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
None				

Bonds

Bond Information

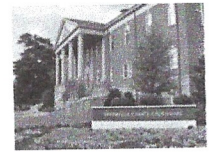
Bond Id	Set Date	Amend Date	Set By	Type	Amount	Type	Amount	Condition
2016BD2330204146	04/05/2016		O'Brien	Cash Bond	\$25,000.00	Surety Bond	\$25,000.00	

Post Information

None



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State of South Carolina vs Woodrow Walter Curry

Case Number:	2016A2330202932	Court Agency:	Greenville General Sessions	Filed Date:	04/26/2016
Case Type:	Criminal-Clerk	Case Sub Type:			
Status:	Dismissed	Assigned Judge:	Cagle, Diane Day	Disposition Judge:	Solicitor
Disposition:	Dismissed - Prosecutorial Discretion				
Disposition Date:	10/30/2017	Date Received:	04/25/2016	Arrest Date:	04/05/2016
Law Enf. Case:	16-57535	True Bill Date:	08/29/2017	No Bill Date:	
Prosecutor Case:		Indictment Number:	2017GS2305438	Waiver Date:	
Probation Case:					

Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Curry, Woodrow Walter	108 E Morgan St Greenville SC 29611	White	M	1971	Defendant		10/30/2017
Downey, M H	4 Mcgee Street Greenville SC 29601				Officer		04/26/2016
Monts, Joyce Krolak	Greenville Cnty. Courthouse 305 E. North St., Ste. 325 Greenville SC 29601				Solicitor		07/03/2017

Charges

Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Curry, Woodrow Walter	0659-Drugs / Possession of 28g (1 oz) or less of marijuana or 10g or less of hash - 1st offense	0659-Drugs / Possession of 28g (1 oz) or less of marijuana or 10g or less of hash - 1st offense	10/30/2017

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Curry, Woodrow Walter	Tracking Sheet	Filing		10/30/2017-16:37		
Curry, Woodrow Walter	True Bill Indictment	Filing		08/29/2017-11:18		
Curry, Woodrow Walter	Pre-File	Filing		07/03/2017-16:10		
Curry, Woodrow Walter	Warrants	Filing		04/25/2016-10:28		
Curry, Woodrow Walter	Checklist	Filing		04/22/2016-10:29		

Financials

Summary

Fine/Costs:	\$0.00	Total Paid for fine/costs:	\$0.00	Balance Due:	\$0.00
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Costs				
Description	Cost Code	Amount	Charge Action	Disbursed Amount
State Assessment	STAASM	\$0.00		\$0.00
Fine to State 44%	AFINES	\$0.00		\$0.00
PCC Surcharge	PCCSUR	\$0.00		\$0.00
Law Enforcement Funding Surcharge \$25	LEFSUR	\$0.00		\$0.00
Victim Conviction Surcharge \$100 / \$25	CVSRCH	\$0.00		\$0.00
Fine to General Fund	AFNEGF	\$0.00		\$0.00
SC Criminal Justice Academy Training	SCCJAT	\$0.00		\$0.00
Victim Services Asm 38.0013% / 5.7831%	ASMVIC	\$0.00		\$0.00

Payments				
Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
None				

Bonds

Bond Information								
Bond Id	Set Date	Amend Date	Set By	Type	Amount	Type	Amount	Condition
2016BD2330204140	04/05/2016		O'Brien	Cash Bond	\$620.00	Surety Bond	\$620.00	

Post Information				
None				



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THE STATE OF SOUTH CAROLINA VS WOODROW W CURRY-JR

Case Number:	38755AG	Court Agency:	West Greenville Summary Court	Filed Date:	03/18/1996
Case Type:	Criminal	Case Sub Type:			
Status:	Disposed	Assigned Judge:	Cagle, Diane Day	Disposition Judge:	Cagle, Diane Day
Disposition:	Guilty Bench Trial				
Disposition Date:	04/17/1996	Date Received:		Arrest Date:	
Law Enf. Case:		True Bill Date:		No Bill Date:	
Prosecutor Case:		Indictment Number:		Waiver Date:	
Probation Case:					

Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Curry-jr, Woodrow W	418 WOODSIDE AVENUE SIMPSONVILLE SC 29681	White	M	1971	Defendant		
Palmateer					Officer		

Charges

Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Curry-jr, Woodrow W	0659-MARIJUANA < 28GM OR < 10GM HASHISH, 1	0659-MARIJUANA < 28GM OR < 10GM HASHISH, 1	04/17/1996

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Curry-jr, Woodrow W	CRIMINAL/TRAFFIC COURT	Event		04/17/1996-09:00	04/17/1996-09:00	
	SCHEDULED TIME PAYMENT	Action		03/18/1996-00:00	04/17/1996-00:00	

Financials

Summary				
Fine/Costs:	\$376.00	Total Paid for fine/costs:	\$376.00	Balance Due: \$0.00
Costs				
Description	Cost Code	Amount	Charge Action	Disbursed Amount
Conversion Criminal Cost	CSCONV	\$376.00		\$376.00
Payments				
Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
05/21/1996	82519	DPORTER	PY	\$376.00



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The State of South Carolina vs. Woodrow Walter Curry Jr

Case Number:	63743CO	Court Agency:	East Greenville Summary Court	Filed Date:	06/14/2004
Case Type:	Criminal	Case Sub Type:			
Status:	Disposed	Assigned Judge:	Garrett, Charles R.	Disposition Judge:	Garrett, Charles R.
Disposition:	Guilty Bench Trial				
Disposition Date:	06/22/2004	Date Received:		Arrest Date:	
Law Enf. Case:		True Bill Date:		No Bill Date:	
Prosecutor Case:		Indictment Number:		Waiver Date:	
Probation Case:					

Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Cannon, J B	4 Mcgee Street Greenville SC 29601				Officer		05/12/2007
Curry Jr, Woodrow Walter	155 Woodside Rd Simpsonville SC 29681	White	M	1971	Defendant		07/16/2004

Charges

Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Curry Jr, Woodrow Walter	0659-Drugs / Poss. of 28g(1oz) or less of marijuana or 10g or less of hash or cocaine	0659-Drugs / Poss. of 28g(1oz) or less of marijuana or 10g or less of hash or cocaine	06/22/2004

Sentencing

And/Or	Description	Amount	Units	Begin Date	End Date	Completion Date	Consecutive or Concurrent
	Schedule Time Payment			07/08/2004			

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Curry Jr, Woodrow Walter	Scheduled Time Payment	Action		07/20/2004-00:00	07/16/2004-00:00	
Curry Jr, Woodrow Walter	Criminal/Traffic Court	Event		06/22/2004-15:00	06/22/2004-20:00	

Financials

Summary					
Fine/Costs:	\$565.00	Total Paid for fine/costs:	\$565.00	Balance Due:	\$0.00
Costs					
Description	Cost Code	Amount	Charge Action	Disbursed Amount	
Victim Services Asm	ASMVIC	\$24.00		\$24.00	

38.0013% / 5.7831%				
Victim Conviction Surcharge \$100 / \$25	CVSRCH	\$25.00		\$25.00
State Assessment	STAASM	\$191.00		\$191.00
Law Enforcement Funding Surcharge \$25	LEFSUR	\$25.00		\$25.00
PCC Surcharge	PCCSUR	\$100.00		\$100.00
Fine to General Fund	AFNEGF	\$200.00		\$200.00

Payments

Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
07/16/2004	263483	AHEISLER	PY	\$565.00



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State of South Carolina vs Woodrow Walter Jr Curry					
Case Number:	2013A2330201947	Court Agency:	Greenville General Sessions	Filed Date:	03/12/2013
Case Type:	Criminal-Clerk	Case Sub Type:			
Status:	Pled Guilty	Assigned Judge:	Garrett, Charles R.	Disposition Judge:	Verdin, Letitia H
Disposition:	Pled Guilty				
Disposition Date:	11/05/2013	Date Received:	03/11/2013	Arrest Date:	03/08/2013
Law Enf. Case:	01-2013-035287	True Bill Date:		No Bill Date:	
Prosecutor Case:		Indictment Number:	2013GS2304893	Waiver Date:	11/05/2013
Probation Case:					

Case Parties							
Click the <input type="checkbox"/> icon to show associated parties.							
Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Azzara, K.J.	4 Mcgee Street Greenville SC 29601				Officer		03/12/2013
<input checked="" type="checkbox"/> Curry, Woodrow Walter Jr	155 Woodside Rd Simpsonville SC 29681	White	M	1971	Defendant		04/09/2015
Ellis, Sloan Price	305 E. North Street, Ste. 325 Greenville SC 29601				Solicitor		11/05/2013
Johnson, Teresa					Court Reporter		11/05/2013
Kellett, Michael Travis - Roche Surety	P O Box 5511 Bail Out Bonding Greenville SC 29611				Bond Entity		03/12/2013
<input checked="" type="checkbox"/> Sullivan, C Timothy	P. O. Box 2543 Greenville SC 29602				Defendant Attorney		03/25/2013

Charges			
Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Curry, Woodrow Walter Jr	3282-Drugs / Dispisal or Assisting Disposal of Methamphetamine waste, 1st Offense	3282-Drugs / Dispisal or Assisting Disposal of Methamphetamine waste, 1st Offense	11/05/2013

Sentencing							
And/Or	Description	Amount	Units	Begin Date	End Date	Completion Date	Consecutive or Concurrent
	5 yrs susp bal susp during prob						

Actions						
Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Curry, Woodrow Walter Jr	Form9	Filing		02/03/2017-16:18		
Curry, Woodrow Walter Jr	Form9	Filing		02/03/2017-16:17		
Curry, Woodrow	Active - Probation	Filing		11/06/2013-		

Walter Jr				10:59		
Curry, Woodrow Walter Jr	Indictment	Filing		11/05/2013- 00:00		
Curry, Woodrow Walter Jr	Pre-File	Filing		06/05/2013- 10:50		
Curry, Woodrow Walter Jr	Rule 6 Objection/Demand	Filing		03/25/2013- 16:44		
Curry, Woodrow Walter Jr	Motion/Rule 5 Disclosure	Motion		03/25/2013- 16:44		
Curry, Woodrow Walter Jr	Brady Request And Motion For Production /Inspection	Motion		03/25/2013- 16:43		
Curry, Woodrow Walter Jr	Motion/Motion for Bond/Bail	Filing		03/25/2013- 16:43		
Curry, Woodrow Walter Jr	Bond	Filing		03/18/2013- 16:07		
Curry, Woodrow Walter Jr	Checklist	Filing		03/12/2013- 00:00		
Curry, Woodrow Walter Jr	Warrants	Filing		03/11/2013- 00:00		

Financials

Summary

Fine/Costs:	\$288.40	Total Paid for fine/costs:	\$288.40	Balance Due:	\$0.00
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Costs

Description	Cost Code	Amount	Charge Action	Disbursed Amount
Victim Conviction Surcharge \$100 / \$25	CVSRCH	\$100.00		\$100.00
PCC Surcharge	PCCSUR	\$150.00		\$150.00
Collection Fee 3%	CFEE3%	\$8.40		\$8.40
Law Enforcement Funding Surcharge \$25	LEFSUR	\$25.00		\$25.00
SC Criminal Justice Academy Training	SCCJAT	\$5.00		\$5.00

Payments

Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
04/09/2015	307404	HORTONL	PY	\$213.00
04/09/2015	307406	HORTONL	PY	\$63.80
01/09/2015	304939	HORTONL	PY	\$11.60

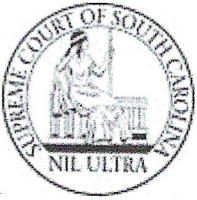
Bonds

Bond Information

Bond Id	Set Date	Amend Date	Set By	Type	Amount	Type	Amount	Condition
2013BD2330202947	03/08/2013		Hicks	Cash Bond	\$5,000.00	Surety Bond	\$5,000.00	

Post Information

Bond Id	Bond Type	Amount	Date Posted	Posted By
2013BD2330202947	Surety Bond	\$5,000.00	03/08/2013	Kellett, Michael Travis - Roche Surety



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State of South Carolina vs Woodrow Walter Jr Curry

Case Number:	2013A2330201932	Court Agency:	Greenville General Sessions	Filed Date:	03/12/2013
Case Type:	Criminal-Clerk	Case Sub Type:			
Status:	Pled Guilty	Assigned Judge:	Cagle, Diane Day	Disposition Judge:	Verdin, Letitia H
Disposition:	Pled Guilty				
Disposition Date:	11/05/2013	Date Received:	03/11/2013	Arrest Date:	03/07/2013
Law Enf. Case:	01-2013-035287	True Bill Date:		No Bill Date:	
Prosecutor Case:		Indictment Number:	2013GS2304892	Waiver Date:	11/05/2013
Probation Case:					

Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
<input checked="" type="checkbox"/> Curry, Woodrow Walter Jr	155 Woodside Rd Simpsonville SC 29681	White	M	1971	Defendant		01/08/2015
Ellis, Sloan Price	305 E. North Street, Ste. 325 Greenville SC 29601				Solicitor		11/05/2013
<input checked="" type="checkbox"/> Gibson, Kenneth Clifton	The Law Office Of Kenneth Gibson P.O. Box 5536 Greenville SC 29606				Defendant Attorney		11/05/2013
Johnson, Teresa					Court Reporter		11/05/2013
Kellett, Michael Travis - Roche Surety	P O Box 5511 Bail Out Bonding Greenville SC 29611				Bond Entity		04/08/2013
Reece, Jonathan S.	4 Mcgee Street Greenville SC 29601				Officer		03/12/2013

Charges

Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Curry, Woodrow Walter Jr	3014-Drugs / Manufacture, distribution, etc. of methamphetamine or cocaine base, 1st	3014-Drugs / Manufacture, distribution, etc. of methamphetamine or cocaine base, 1st	11/05/2013

Sentencing

And/Or	Description	Amount	Units	Begin Date	End Date	Completion Date	Consecutive or Concurrent
	10 yrs susp bal susp w/prob 30 mos						

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Curry, Woodrow Walter Jr	Form9	Filing		02/03/2017-16:18		
Curry, Woodrow Walter Jr	Form9	Filing		02/03/2017-16:16		
Curry, Woodrow	Active - Probation	Filing		11/06/2013-		

Walter Jr				11:01		
Curry, Woodrow Walter Jr	Indictment	Filing		11/05/2013- 00:00		
Curry, Woodrow Walter Jr	Pre-File	Filing		06/05/2013- 10:50		
Curry, Woodrow Walter Jr	Bond	Filing		03/18/2013- 16:07		
Kellett, Michael Travis - Roche Surety	Surety \$10 Fee	Filing		03/18/2013- 10:37		
Curry, Woodrow Walter Jr	Warrants	Filing		03/11/2013- 00:00		
Curry, Woodrow Walter Jr	Checklist	Filing		03/11/2013- 00:00		

Financials

Summary

Fine/Costs:	\$298.40	Total Paid for fine/costs:	\$298.40	Balance Due:	\$0.00
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Costs

Description	Cost Code	Amount	Charge Action	Disbursed Amount
Victim Conviction Surcharge \$100 / \$25	CVSRCH	\$100.00		\$100.00
Law Enforcement Funding Surcharge \$25	LEFSUR	\$25.00		\$25.00
PCC Surcharge	PCCSUR	\$150.00		\$150.00
Collection Fee 3%	CFEE3%	\$8.40		\$8.40
SC Criminal Justice Academy Training	SCCJAT	\$5.00		\$5.00
Surety \$10	SURETY	\$10.00		\$10.00

Payments

Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
01/09/2015	304939	HORTONL	PY	\$48.40
10/07/2014	302610	HORTONL	PY	\$60.00
07/08/2014	297251	HORTONL	PY	\$60.00
04/04/2014	292489	JUDYS	PY	\$20.00
02/21/2014	290761	lhorton	PY	\$40.00
01/22/2014	289185	HORTONL	PY	\$60.00
04/08/2013	240787	LHORTON	PY	\$10.00

Bonds

Bond Information

Bond Id	Set Date	Amend Date	Set By	Type	Amount	Type	Amount	Condition
2013BD2330202947	03/08/2013		Hicks	Cash Bond	\$15,000.00	Surety Bond	\$15,000.00	

Post Information

Bond Id	Bond Type	Amount	Date Posted	Posted By
2013BD2330202947	Surety Bond	\$15,000.00	03/08/2013	Kellett, Michael Travis - Roche Surety

**FORM 7
PROOF OF SERVICE**

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM ANDERSON COUNTY
Court of General Sessions

R. Lawton McIntosh, Judge

Appellate Case No. 2017-002011
Case Number: 2016A05324

State of South Carolina,

Respondent,

v.

Jason Franklin Carver,

Appellant.

PROOF OF SERVICE

Pursuant to Supreme Court of South Carolina's Amended Order 2020-05-29-02, I served a copy of Appellant's Addendum to Petition for Rehearing, and Proof of Service, of same upon The Honorable Jenny Abbott Kitchings, Clerk of South Carolina Court of Appeals, and upon the Respondent, by and through its counsel of record, Attorney General Alan McCrory Wilson, Chief Deputy Attorney General W. Jeffrey Young, Deputy Attorney General Donald J. Zelenka, and Senior Assistant Attorney General Melody J. Brown, by email through the following addresses:

Ms. Jenny Abbott-Kitchings	ctappfilings@sccourts.org
Attorney General Alan McCrory Wilson	awilson@scag.gov
Chief Deputy Atty. General W. Jeffrey Young	jyoung@scag.gov
Deputy Attorney General Donald J. Zelenka	dzelenka@scag.gov
Sr. Asst. Deputy Atty. General Melody J. Brown	mbrown@scag.gov

A copy of the above-mentioned Motion shall be mailed to The Honorable Jenny

RECEIVED

Aug 23 2021

SC Court of Appeals

Abbott Kitchings, Clerk of Court South Carolina Court of Appeals, at PO Box 11629
Columbia, SC 29211, and the Respondents, by and through Honorable Alan Wilson at the
Office Attorney General, P.O. Box 11549, Columbia, S.C. 29211, by depositing copy of
it in the United States Mail, postage prepaid, as ordered.

Anderson, South Carolina
August 23, 2021.

s/Donald L. Smith
Donald L. Smith, (Bar No.: 6699)
122 N. Main Street
Anderson SC 29621
Telephone: (864) 642-9284
Facsimile: (864) 642-9285
attorneydonaldsmith@gmail.com
Attorney for Appellants

FORM 8
LETTER TO THE COURT OF APPEALS CLERK OF COURT
FILING APPELLANT'S PETITION FOR REHEARING

August 23, 2021

The Honorable Jenny Abbott Kitchings
Clerk of Court South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RECEIVED
Aug 23 2021
SC Court of Appeals

RE: State of South Carolina v. Jason Carver
Appellate Case No.: 2017-002011
Case No. 2016-A05324

Dear Ms. Kitchings:

Please find enclosed the following documents for filing:

1. Appellant's Addendum to Petition for Rehearing and Suggestion for Rehearing En Banc,
2. Proof of Service of same.

Sincerely,

s/Donald L. Smith

Donald L. Smith (Bar No.: 6699)

122 N. Main Street

Anderson SC 29621

Telephone: (864) 642-9284

Facsimile: (864) 642-9285

attorneydonaldsmith@gmail.com

Attorney for Appellants

cc:

Attorney General Alan McCrory Wilson
Chief Deputy Attorney General W. Jeffrey Young
Deputy Attorney General Donald J. Zelenka
Senior Assistant Attorney General Melody J. Brown