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Oct 11 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenville County
Honorable Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2020-001421

THE STATE,

Respondent,

vs.

ROBERT WATKINS,

Appellant.

**MOTION FOR LEAVE TO FILE A
SUPPLEMENTAL RECORD ON APPEAL**

Respondent (“the State”), through its undersigned counsel, would respectfully show unto the Court as follows:

I.

On July 28, 2021, the State filed its Designation of Matter in this appeal. The only item designated by the State was Indictment No. 2002-GS-23-01063. The State received the Record On Appeal in the this matter on October 6, 2021. The Record served on the State contains only one page of the indictment. R. 27. The State submits to correct this error and to allow the Court to consider all of the issues raised in this appeal, a copy of both sides of the indictment is necessary.

II.

Pursuant to Rule 210(c), SCACR, the Record on Appeal shall contain all matter designated by the parties. Based on the omission of both sides of the indictment 2002-GS-23-


01063 in the Record On Appeal, the State is submitting a proposed Supplemental Record On Appeal which contains a complete copy of the indictment.

WHEREFORE, Respondent prays that this Court will allow the State to file a Supplemental Record on Appeal, accept the filing of the proposed Supplemental Record on Appeal, hold time limits in abeyance until there has been a ruling on this motion, and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

JOSHUA A. EDWARDS
Assistant Attorney General

By:  _____
Joshua A. Edwards

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PROOF OF SERVICE

I, Anne Mueller, certify that I have served the within Motion For Leave To File A Supplemental Record On Appeal and proposed Supplemental Record On Appeal on Appellant by depositing one copy of the same in the United States mail, postage prepaid, addressed to:

Robert M. Watkins, 243803
Perry Correctional Institution
430 Oaklawn Rd.
Pelzer, SC 29669

I further certify that all parties required by Rule to be served have been served.
This 11th day of October, 2021.



Anne Mueller
Legal Assistant

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CERTIFICATE OF COUNSEL

The undersigned certifies that this Supplemental Record on Appeal complies with Rule 211(b), SCACR, and the April 15, 2014, order from the South Carolina Supreme Court entitled “Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings.”

ALAN WILSON
Attorney General

JOSHUA A. EDWARDS
Assistant Attorney General
S.C. Bar No. 101188

WILLIAM W. WILKINS
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ATTORNEYS FOR RESPONDENT

October 11, 2021