

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF GENERAL SESSIONS
MOTION COVERSHEET

WARRANT/TICKET/
INDICTMENT #'s

2018A1020100013

2018A1020100014

2022GS1000549

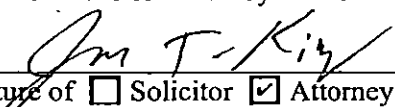
2022GS1000550

STATE OF SOUTH CAROLINA

-vs-

RONZELL OLDS

DEFENDANT

Solicitor: Chad Simpson, Bar No. _____ Address: 101 Meeting Street, 4th Floor Phone: (843) 958-1900 E-mail: SimpsonC@SCSolicitor9.org	Defendant's Attorney: Jason T. King, Bar No. 068630 Address: 101 Meeting Street, 5th Floor Phone: (843) 958-1850 E-mail: JKing@charlestoncounty.org
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED	
SECTION I: Hearing Information	
Nature of Motion: <u>Motion To Exclude Other Crimes, Wrongs, and Acts</u>	
Estimated Time Needed: <u>10 min.</u>	Court Reporter Needed: <input checked="" type="checkbox"/> YES/ <input type="checkbox"/> NO
SECTION II: Motion/Order Type	
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of <input type="checkbox"/> Solicitor <input checked="" type="checkbox"/> Attorney for Defendant	<u>3-7-22</u> Date submitted

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MAR 17 2022

SC Court of Appeals

BY KLH

JULIE J. ARMSTRONG
CLERK OF COURT

2022 MAR -7 PM 12:27

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STATE OF SOUTH CAROLINA
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COUNTY OF CHARLESTON
JULIE J. ARMSTRONG
CLERK OF COURT

BY KLH

STATE OF SOUTH CAROLINA

vs.

RONZEL OLDS

Defendant

) IN THE COURT OF GENERAL SESSIONS
) FOR THE NINTH JUDICIAL CIRCUIT

) Warrant No: 2018A1020100013; 2018A1020100014

) Indictment No: 2022GS1000549; 2022GS1000550

) Charge: Armed Robbery; Possession of a Weapon
) During a Violent Crime

MOTION TO EXCLUDE OTHER
CRIMES, WRONGS, AND ACTS

The Defendant moves to exclude evidence of evidence of other crimes, wrongs, or acts by the Defendant. Evidence of other crimes, wrongs, or acts are not admissible to prove the character of a person to show action in conformity therewith. State v. Lyle, 125 S.C. 406 (1923); S.C.R.E. 404(b). Evidence of other crimes must be put to a rather severe test before admission. State v. Timmons, 327 S.C. 48 (1997). If the prior bad act is not a conviction, then it must first be established by clear and convincing evidence. State v. Mathis, 359 S.C. 450 (Ct. App. 2004). Allowing evidence of Defendant's arrest for another armed robbery is impermissible character evidence. S.C.R.E. 404(a). Any probative value of the evidence is substantially outweighed by undue prejudice. S.C.R.E. 403.

Respectfully Submitted,

Jason T. King
Jason T. King
Assistant Public Defender
Attorney for Defendant

Charleston, South Carolina

Dated: 3-7-2022

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF GENERAL SESSIONS
MOTION COVERSHEET

STATE OF SOUTH CAROLINA

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-vs-

RONZELL OLDS

DEFENDANT

Solicitor: Chad Simpson, Bar No. _____	Defendant's Attorney: Jason T. King, Bar No. 068630
Address: 101 Meeting Street, 4th Floor	Address: 101 Meeting Street, 5th Floor
Phone: (843) 958-1900	Phone: (843) 958-1850
E-mail: SimpsonC@SCSolicitor9.org	E-mail: JKing@charlestoncounty.org

- MOTION HEARING REQUESTED
 FORM MOTION, NO HEARING REQUESTED

SECTION I: Hearing Information

Nature of Motion: Motion To Sequester Witnesses

Estimated Time Needed: 10 min.

Court Reporter Needed: YES/ NO

SECTION II: Motion/Order Type

- Written motion attached
 Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

Jason T. King
Signature of Solicitor Attorney for Defendant

3-7-22
Date submitted

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COUNTY OF CHARLESTON)

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Charge: Armed Robbery; Possession of a Weapon
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STATE OF SOUTH CAROLINA)

vs.)

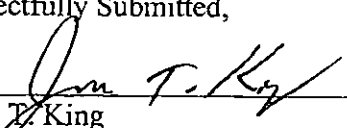
RONZEL OLDS)

Defendant)

MOTION TO SEQUESTER WITNESSES

The Defendant moves to sequester the witnesses in this case pursuant to South Carolina Rule of Evidence 615. S.C. R. EVID. 615. The presence of the witnesses in the courtroom is not essential to the presentation of the State's case. Sequestration of the witnesses is necessary to prevent witnesses from tailoring their testimony after hearing the testimony of a prior witness or learning the defense's theory of the case during opening statements and cross examination. Furthermore, sequestration is necessary and proper as it will assist the factfinder in determining the credibility of witnesses and weeding out unreliable testimony.

Respectfully Submitted,



Jason T. King
Assistant Public Defender
Attorney for Defendant

Charleston, South Carolina

Dated: 3-7-2022

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE COURT OF GENERAL SESSIONS)
MOTION COVERSHEET)

STATE OF SOUTH CAROLINA)

WARRANT/TICKET/)
INDICTMENT #'s)

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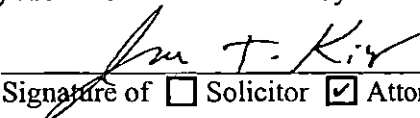
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-vs-)

RONZELL OLDS)

DEFENDANT)
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SECTION I: Hearing Information	
Nature of Motion: <u>Motion To Suppress Statements</u>	
Estimated Time Needed: <u>10 min.</u> Court Reporter Needed: <input checked="" type="checkbox"/> YES/ <input type="checkbox"/> NO	
SECTION II: Motion/Order Type	
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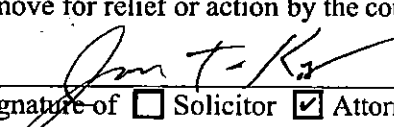
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STATE OF SOUTH CAROLINA

-vs-

RONZELL OLDS

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SECTION I: Hearing Information	
Nature of Motion: Motion To Suppress Hearsay	
Estimated Time Needed: 10 min.	Court Reporter Needed: <input checked="" type="checkbox"/> YES/ <input type="checkbox"/> NO
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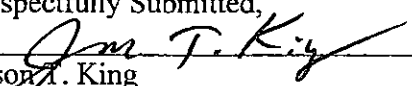
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MOTION TO SUPPRESS HEARSAY

The defendant, by and through the undersigned attorney, hereby moves to suppress hearsay statements made by law enforcement during an interrogation of the defendant. The State intends to introduce evidence of a video recorded statement made by the defendant during questioning by detectives with the Charleston Police Department. Questions and statements made by law enforcement during an interrogation are inadmissible hearsay, unless the statements are admissible for a valid non-hearsay purpose or as an exception to the hearsay rule. State v. Brewer, 411 S.C. 401 (2015); State v. Washington, No. 2017-001111, 2020 S.C. App. LEXIS 107 (Ct. App. 2020).

Respectfully Submitted,



Jason T. King
Assistant Public Defender
Attorney for Defendant

Charleston, South Carolina

Dated: 3-7-2022