

**APPEAL: PETITION FOR RECONSIDERATION REGARDING APPEAL DENIAL BASED ON REPRESENTATION STATUS**

*(Motion to Revoke Attorney)*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

**RECEIVED**

JUN 19 2024

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Case No. 2023-GS-40-08168  
Appellate Case No. 2024-000796

Mary Wilcox

Respondent(s),

v.

Rachel Wilcox,

Appellant.

**NOTICE: PETITION FOR RECONSIDERATION REGARDING APPEAL DENIAL BASED ON REPRESENTATION STATUS**

It is the understanding of myself, Rachel Wilcox, that my **previously established** legal representation by court appointed counsel **only** extended up until the time & point that said counsel's guilty plea negotiation deal(s)/attempt(s) with 'The State's' prosecutor(s) &/or Mary Wilcox (alleged accuser/victim) concerning the sentencing/prosecution of myself (**currently & previously Self-Representing as Appellate as of May 15<sup>th</sup> 2024,**) were communicated & officially entered in at the Court of General Sessions **by & through the influence of my (the appellant's) legally appointed counsel/attorney** while under duress on the date of May 6<sup>th</sup> 2024; **immediately after which time, any/all further responsibility of said court appointed attorney's obligation(s) to continue providing counsel/representation regarding Case No. 2023-GS-40-08168 legally ceased to remain in effect, therefore then making it the sole responsibility of myself (current appellate, Rachel Wilcox,) to independently ensure that my right to an appeal was submitted on my own behalf** within 10 days of May 6<sup>th</sup> 2024, (whether then with **intent to proceed legally representing myself concerning the formulation & submission of basis for appeal, or whether by way of establishing another form of independent legal counsel/representation separate from that of which had been previously court appointed), as again, said court appointed representation obligation had ceased to remain in legal effect immediately after which time my (the appellant's) plea was entered, while under duress, on May 6<sup>th</sup> 2024, according to the best of my informed understanding by my formerly appointed counsel member themselves.**) Please consider my previous court appointed attorney's obligation to continue providing legal representation for Case No. 2023-GS-40-08168 on my behalf null & void by default as of the end of business day, May 6<sup>th</sup> 2024, although, (if applicable) with the option to resume providing **separate** legal counsel regarding Appellant Case No. 2024-000796 beginning with the new/future start date upon which SC Court of Appeals accepts Appellant's right to appeal verdict/sentence, so long as previous counsel member has no independent objection(s) to providing such representation. Historical/Timeline documents are being returned to SC Court of Appeals according to ongoing pursuit of appellant's legal right & intent to appeal this matter.

June 19<sup>th</sup> 2024

s/ Rachel Wilcox  
Rachel Wilcox  
7909B Spring Flower Rd.  
Columbia, SC 29223  
(864) 494-1500  
Appellant

*Richland County  
Revised Document  
6/19/24*

**MOTION FOR STATE TO CEASE & DESIST PURSUIT OF PROSECUTION &/OR OBSTRUCTION OF APPELLANT'S RIGHT TO APPEAL ON BEHALF OF RESPONDENT**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

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JUN 19 2024

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Case No. 2023-GS-40-08168  
Appellate Case No. 2024-000796

Mary Wilcox

Respondent,

v.

Rachel Wilcox,

Appellant.

**NOTICE: MOTION FOR STATE TO CEASE & DESIST PURSUIT OF PROSECUTION &/OR OBSTRUCTION OF APPELLANT'S RIGHT TO APPEAL ON BEHALF OF NOTIFIED RESPONDENT WITHOUT THEIR EXPRESS WRITTEN OBJECTION**

I, Rachel Wilcox, certify that Mary Wilcox (alleged 'victim'/'potential accuser' with relation to 'Richland County' initiated Case No. 2023-GS-40-08168) has received notice of her status as (Respondent) in Appellate Case No. 2024-000796. I further certify that Mary Wilcox has received a copy of this notice informing her of her right to submit a formal objection to this motion by way of written submission to 'The State' (Richland County & SC Court of Appeals) stating if she independently & of her own free will wishes to compel 'The State' (Richland County) to assume position as 'Respondent' in Appellant Case No. 2024-000796 on her behalf. If the 'The State' (Richland County) does not receive an express written request from Mary Wilcox (alleged victim) within 10 days from the date of this notice compelling 'The State' (Richland County) to assume position as 'Respondent' on her behalf pursuant to Appellant Case No. 2024-000796, then the 'The State' (Richland County) should consider itself relieved from any/all obligation to assume position as 'Respondent' relative to Appellate Case No. 2024-000796, and therefore cease & desist any/all further pursuit(s) to prosecute, object to the appeal of, and/or enforce punitive action against Rachel Wilcox (Appellant) relative to Case No. 2023-GS-40-08168 and the appeal thereof.

June 19<sup>th</sup> 2024

s/ Rachel Wilcox  
Rachel Wilcox  
7909B Spring Flower Rd.  
Columbia, SC 29223  
(864) 494-1500  
Appellant

*Richland County  
Refused Deurnt  
6/19/24*

**NOTICE OF RESPONDENT'S RIGHT TO OBJECT TO MOTION FOR STATE TO CEASE & DESIST PURSUIT OF PROSECUTION &/OR OBSTRUCTION OF APPELLANT'S RIGHT TO APPEAL ON BEHALF OF RESPONDENT**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Case No. 2023-GS-40-08168  
Appellate Case No. 2024-000796

**RECEIVED**  
JUN 19 2024  
SC Court of Appeals

Mary Wilcox

Respondent,

v.

Rachel Wilcox,

Appellant.

**NOTICE: RESPONDENT'S RIGHT TO OBJECT TO APPELLANT'S MOTION FOR STATE TO CEASE & DESIST PURSUIT OF PROSECUTION &/OR OBSTRUCTION OF APPELLANT'S RIGHT TO APPEAL ON BEHALF OF NOTIFIED RESPONDENT WITHOUT THEIR EXPRESS WRITTEN OBJECTION**

This notice is to inform you, Mary Wilcox ('Respondent' on basis of being the alleged 'victim'/'potential accuser' with relation to 'Richland County' initiated Case No. 2023-GS-40-08168) of your right to submit a formal written objection to 'The State's' (Richland County's) received motion to 'Cease & Desist' pursuit of punitive action/judgment(s) against Rachel Wilcox (Appellate) on behalf of yourself as a/the 'Respondent' in Appellate Case No. 2024-000796 without receipt of your express written objection to such being submitted to 'The State' (Richland County & SC Court of Appeals) within 10 days of the date of this notice, thereby informing 'The State' (Richland County & SC Court of Appeals) of your intent to compel 'The State' (Richland County) to assume position as 'Respondent' on your behalf in Appellate Case No. 2024-000796. If 'The State' (Richland County) does not, within 10 days of the date of this notice, receive a formally written request for representation and/or objection to Appellant's 'Motion for State to Cease & Desist' by way of receiving written notice informing them of such disposition/request for 'The State' (Richland County) to assume a position of the contrary (whether via receipt of such submission from yourself directly, and/or via receipt of such submission in accordance with your own independently sought out, express, uninhibited, unobstructed, & non-externally compelled free will,) as for 'The State' (Richland County) to assume position as 'Respondent' in Appellant Case No. 2024-000796 on behalf of yourself, Mary Wilcox, (Respondent/Alleged 'victim'/'potential accuser') then the 'The State' (Richland County) should consider itself relieved from any/all obligation to assume position as 'Respondent' relative to Appellate Case No. 2024-000796, and therefore cease & desist any/all further pursuit(s) to prosecute, object to the appeal of, and/or enforce punitive action against Rachel Wilcox (Appellant) relative to Case No. 2023-GS-40-08168 and the appeal thereof.

June 19<sup>th</sup> 2024

s/ Rachel Wilcox  
Rachel Wilcox  
7909B Spring Flower Rd.  
Columbia, SC 29223  
(864) 494-1500  
Appellant

*Richland  
County Refused  
Deemed  
6/19/24*

FORM 7

PROOF OF SERVICE FOR "APPEAL: PETITION FOR RECONSIDERATION OF APPEAL DENIAL BASED ON REPRESENTATION STATUS"

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Case No. 2023-GS-40-08168  
Appellate Case No. 2024-000796

**RECEIVED**  
JUN 19 2024  
SC Court of Appeals

Mary Wilcox

Respondent,

v.

Rachel Wilcox,

Appellant.

PROOF OF SERVICE

I certify that the "Notice of Petition for Reconsideration Regarding Appeal Denial Based on Representation Status" has been served to "The State" (Richland County: Stamped "FILED" June 19<sup>th</sup> 2024) via in-person delivery & to "Mary Wilcox" via digital AirMail File Transfer (Received on June 19<sup>th</sup> 2024.)

June 19<sup>th</sup> 2024

s/ Rachel Wilcox  
Rachel Wilcox  
7909 Spring Flower Rd.  
Columbia, SC 29223  
(864) 494-1500  
Appellant

*Richland County  
Refused Document  
6/19/24*

**FORM 7**  
**PROOF OF SERVICE FOR "MOTION FOR STATE TO CEASE & DESIST PURSUIT OF PROSECUTION AND/OR OBSTRUCTION OF APPELLATE'S RIGHT TO APPEAL ON BEHALF OF RESPONDENT"**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Case No. 2023-GS-40-08168  
Appellate Case No. 2024-000796

**RECEIVED**  
JUN 19 2024  
SC Court of Appeals

Mary Wilcox

Respondent,

v.

Rachel Wilcox,

Appellant.

**PROOF OF SERVICE**

I certify that the "Notice of Motion for State to Cease & Desist Pursuit of Prosecution and/or Obstruction of Appellant's Right to Appeal on Behalf of Notified Respondent Without Their Express Written Objection" has been served to "The State" (Richland County; Stamped "FILED" June 19<sup>th</sup> 2024) via in-person delivery & to "Mary Wilcox" via digital AirMail File Transfer (Received on June 19<sup>th</sup> 2024.)

June 19<sup>th</sup> 2024

s/ Rachel Wilcox  
Rachel Wilcox  
7909 Spring Flower Rd.  
Columbia, SC 29223  
(864) 494-1500  
Appellant

*Richland County  
Refused  
Document 6/19/24*

FORM 7

PROOF OF SERVICE FOR "NOTICE OF RESPONDENT'S RIGHT TO OBJECT TO MOTION FOR STATE TO CEASE & DESIST PURSUIT OF PROSECUTION AND/OR OBSTRUCTION OF APPELLANT'S RIGHT TO APPEAL ON BEHALF OF RESPONDENT"

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Case No. 2023-GS-40-08168  
Appellate Case No. 2024-000796

RECEIVED

JUN 19 2024

SC Court of Appeals

Mary Wilcox

Respondent,

v.

Rachel Wilcox,

Appellant.

PROOF OF SERVICE

I certify that the "Notice of Respondent's Right to Object to Motion for State to Cease & Desist Pursuit of Prosecution and/or Obstruction of Appellate's Right to Appeal on Behalf of Notified Respondent Without Their Express Written Objection" has been served to "The State" (Richland County: Stamped "FILED" June 19<sup>th</sup> 2024) via in-person delivery & to "Mary Wilcox" via digital AirMail File Transfer (Received on June 19<sup>th</sup> 2024.)

June 19<sup>th</sup> 2024

s/ Rachel Wilcox  
Rachel Wilcox  
7909 Spring Flower Rd.  
Columbia, SC 29223  
(864) 494-1500  
Appellant

*Richland County  
Refused Document  
6/19/24*