

**RECEIVED**  
SEP 16 2024  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM PICKENS COUNTY  
COURT OF GENERAL SESSIONS

---

WILLIAM C. MCMASTER III CIRCUIT COURT JUDGE

---

CASE NO. 2024-GS-39-01684

---

The State,

Respondent,

-V-

Jonathan Joshua Plumley,

Appellant.

---

NOTICE OF APPEAL

---

Jonathan Joshua Plumley, appeals his conviction and sentence in this case. The Appeal is taken from a Plea made September 4, 2024.

Appellant's Sentence Sheet, dated September 4, 2024 was received September 5, 2024.

The Appeal is based upon the following information:

Appellant was called before the Court without Appellant's Court appointed attorney being present.

Appellant was presented with the "plea recommendation"

without prior knowledge and or discussion with Public Defender.

Appellant informed the Court that Appellant did not 'understand' the plea".

Appellant did not meet with nor have communication with the Public Defender for over a year before the Plea.

Appellant did not know Appellant was making a plea, but was reporting to the Court for an appearance.

Appellant believed Appellant was having a jury hearing, as Appellant was not guilty.

Appellant requested the Public Defender to present Appellant's defense that Appellant was an addict with no intent to violate the law.

September 12, 2024

s/JAMES P. O'CONNELL #4259  
139 Grace Dr. Easley, SC 29640  
Phone FAX 864-220-0005  
email: [jpatrickoconnell@yahoo.com](mailto:jpatrickoconnell@yahoo.com)  
Attorney for Appellant

Public Defender Pickens County  
Catherine Anderson Wyse, Esq.  
107-B West North 1<sup>st</sup> Street  
Post Office Box 834  
Seneca, South Carolina (SC) 29678

Solicitor's Office Thirteenth Judicial Circuit  
Assistant Solicitor Sarah Fowler Johnson  
Pickens County Courthouse B-220  
214 East Main Street  
Pickens, South Carolina (SC) 29671

Presiding Sentencing Judge  
The Honorable William C. McMaster, III  
Greenville County Courthouse Suite 314  
305 East North Street  
Greenville, South Carolina (SC) 29601

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

**RECEIVED**  
SEP 16 2024  
SC Court of Appeals

APPEAL FROM PICKENS COUNTY  
COURT OF GENERAL SESSIONS

---

WILLIAM C. MCMASTER III CIRCUIT COURT JUDGE

---

CASE NO. 2024-GS-39-01684

---

The State,

Respondent,

-v-

Jonathan Joshua Plumley,

Appellant.

---

PROOF OF SERVICE

---

I certify that I have served the Notice of Appeal on the Public Defender Pickens County, the Assistant Solicitor for Thirteenth Judicial Circuit Pickens County, and the Presiding Sentencing Judge William C. McMaster III, by depositing a copy of it in the United States Mail, postage prepaid, on September 12, 2024 address as shown below.

September 12, 2024

s/JAMES P. O'CONNELL #4259  
139 Grace Dr. Easley, SC 29640

Phone FAX 864-220-0005  
email: [jpatrickoconnell@yahoo.com](mailto:jpatrickoconnell@yahoo.com)  
Attorney for Appellant

Public Defender Pickens County  
Catherine Anderson Wyse, Esq.  
107-B West North 1<sup>st</sup> Street  
Post Office Box 834  
Seneca, South Carolina (SC) 29678

Solicitor's Office Thirteenth Judicial Circuit  
Assistant Solicitor Sarah Fowler Johnson  
Pickens County Courthouse B-220  
214 East Main Street  
Pickens, South Carolina (SC) 29671

Presiding Sentencing Judge  
The Honorable William C. McMaster, III  
Greenville County Courthouse Suite 314  
305 East North Street  
Greenville, South Carolina (SC) 29601

*James P. O'Connell*  
*Attorney at Law*  
*139 Grace Drive*  
*Easley, South Carolina 29640*  
*Phone 864-220-005 Fax 220-0005*  
jpatrickoconnell@yahoo.com

**RECEIVED**  
SEP 16 2024  
SC Court of Appeals

September 12, 2024

Clerk South Carolina Court of Appeals  
Attn: Clerk of Court Jenny Abbott Kitchings  
1220 Senate Street  
Columbia, South Carolina (SC) 29201  
Post Office Box 11629  
Columbia, South Carolina (SC) 29211

RE: State of South Carolina, Respondent v. Jonathan Joshua Plumley,  
Appellant Criminal Case No. 2024-GS-39-01684 Notice of Appeal and  
Proof of Service

Dear Hon. Jenny Abbott Kitchings:

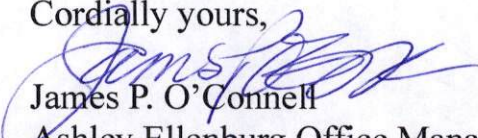
Enclosed for filing is the Notice of Appeal and the Proof of Service.

The same were served on the parties named and the Presiding  
Sentencing Judge.

The Notice of Appeal has the Sentencing Order attached.

Advise promptly in writing, which includes, email, if needed.

Cordially yours,

  
James P. O'Connell  
Ashley Ellenburg Office Manager  
encls as stated  
cc included to all services

James P. O'Connell  
Attorney At Law  
139 Grace Drive  
Easley, South Carolina 29640  
Phone/Fax 864-220-0005  
Email [jpatrickoconnell@yahoo.com](mailto:jpatrickoconnell@yahoo.com)

**RECEIVED**  
SEP 16 2024  
SC Court of Appeals

September 12, 2024

Public Defender Pickens County  
Catherine Anderson Wyse, Esq.  
107-B West North 1<sup>st</sup> Street  
Post Office Box 834  
Seneca, South Carolina (SC) 29678

Solicitor's Office Thirteenth Judicial Circuit  
Assistant Solicitor Sarah Fowler Johnson  
Pickens County Courthouse B-220  
214 East Main Street  
Pickens, South Carolina (SC) 29671

Presiding Sentencing Judge  
The Honorable William C. McMaster, III  
Greenville County Courthouse Suite 314  
305 East North Street  
Greenville, South Carolina (SC) 29601

RE: State of South Carolina, Respondent v. Jonathan Joshua Plumley, Appellant  
Criminal Case No. 2024-GS-39-01684 Notice of Appeal and Proof of Service

Dear Hon. Jenny Abbott Kitchings:

Enclosed for personal service and is served, is the Notice of Appeal and the Proof of Service, with copy of letter to to the Appeals Court and the Notice of Appeal has the Sentencing Order attached.

Advise promptly in writing, which includes, email, if needed. Cordially Yours,

  
James P. O'Connell

ATE Office Mgr.

Enclosures as stated

CONNELL  
139 Grace St  
Casley, SC 29640



Greenlee P&OC 250  
THU 12 SEP 2024 CM

Clerk of Court Appeals  
South Carolina  
ATTN: Hon. J. A. Kitchens

PO Box 11629  
Columbia SC 29211

**RECEIVED**  
SEP 16 2024  
SC Court of Appeals