

State of South Carolina  
In the Supreme Court

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FEB 10 2025

S.C. SUPREME COURT

Appeal from Richland County  
General Session Court  
Judge: Henry F. Floyd

I Keisha Perry  
vs  
The State

Notice of Intent to Appeal  
S.C. A.C.R. Rule 203  
2022-CP40-03403

### Notice of Intent to Appeal

The (Appellant) files this notice of Intent to Appeal the denial of Habeas Corpus Relief Act.

The Honorable Judge Henry F. Floyd denied the (Appellant) Habeas Corpus Relief act, on November 20, 2024

The (Appellant) received a copy of the order January 23, 2025. The Appellant request on several times for a copy of the judges decision, on the merits or status of my Habeas Corpus Act.

### (Procedural Background)

The appellant was found guilty of Homicide by child abuse by trial from a jury. The appellant was sentenced to life w/out parole. The appellant and codefendant had a joint trial.

The (Appellant) Appellate Defense Atty and trial Atty refused to raise this issue for a seperate trial.

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Keisha Perry  
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2022 CP-40-03043

Notice of Intent to Appeal

S.C.A.C.R. Rule 203

Affidavit of Service

Statement of fact

The (Appellant) was prejudice by trial Attorney who refused to file a motion for (sever)

The trial counsel was also neglect when he failed to cross examine the codefendant on trial as to free the (Appellant)

when co-defendant testified that he did hit the child.

The trial counsel did not give Jury instructions for the change of motion not withstanding the Judgement to find the Defendant Not-guilty of the murder-homicide by child abuse.

The Attorney failed to charge the Jury to find the (Appellant) guilty of a lesser charge

Closing Argument

Britton Erra (Britton-v-US 391, U.S. 123,88 SC 11620 (1968)) A non-testifying co-defendant confession that implicates both of them where the statement is not admissible against the defendant, under an exception to the hearsay rule.

The (appellant) has a constitutional right of confrontation by admitted information in lieu my confession. Codefendant testimony was a result of his confession, which implicated the (appellant) as a coconspirator which is based on hearsay.

The (Appellant) was denied due process of Law guaranteed to her by the U.S. Constitutional Amendment 6<sup>th</sup>, 14<sup>th</sup> Amendment U.S.C.A.

The State of South Carolina  
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Table of Authorities

10th Amendment U.S.C.A

14th Amendment U.S.C.A

Ex parte Nix motion for Enlargement of time

S.C.A.C.R. Rule 11

S.C.R.C.P Rule 11

Motion for a writ of Certiorari

In Junction relief S.C.R.C.P Rule 65g

Motion to alter the order of Judgement S.C.R.C.P  
59 G. BRITTON - V - US 391 US 123 88 S.C.T. 1620 9/68

Precedent Case Law / No 265271/2008-D1494208

Henry Fletcher 363 SC 221, 409 SC 2d 572 - Supreme Court

Enc. Jan 2022 / Granted a writ of certiorari / Rene. A-22-2008

Enc. Jan 17, 2023

August 9th, 2023

March 2024

October 18, 2024

December 2024 → January 2025

Habeas Corpus Relief Claim  
Letter from the (appellants) requesting the status of the Habeas  
Corpus Act.

September 16, 2023

March 1, 2023

July 2, 2022

April 15, 2024

April 10, 2024

Jan 3, 2025

Dec 5, 2024

Nov 12, 2024

Nov 4, 2024

The State of South Carolina  
In the Supreme Court of South Carolina

I Keisha Perry

2022-CP-40-0343

S.C.A.C.R. Rule 4

Motion for a

writ of

The State of South Carolina Certiorari

The (appellant) files this notice and motion for a writ of Certiorari based on the after discovered evidence, Pursuant to S.C.A.C.R. Rule 29.

Ground 1

The (appellant) filed this Habeas Corpus relief act pursuant to Article I, Section 18, S.C. constitution. The constitution of the United States, and S.C. code Ann Section (17-17-10)

This claim was filed on June 14, 2022. The (state) failed to respond to the claim, within (90) ninety days pursuant to the S.C.R.C.P. Rules of the Anti-Terrorism Death Penalty Act which became law in July of 1995 but became into effect on January 1, 1996. Pursuant to S.C. code Ann law (Rule 11) Uniformed Post conviction Relief Act, the (state) must respond to the claim within 60 days arising from a (guilty plea) and (90) day arising from a jury trial.

The (state) failed to file an Ex parte Nix motion for enlargement of time in which to respond to the above Habeas Corpus Relief Act

Ground 2

The (appellant) submitted multiple requests to the court, inquiring about the status of her claim on each reply. The (appellant) was informed that there was no (Affidavit) of Service filed by her, and that the (chief administrative Judge) Request that the (appellant) submit a AFFIDAVIT of Service. All though the (appellant) did comply it was alleged that NO AFFIDAVIT of service was received.

The State of South Carolina  
In the Supreme Court

WRIT OF CERTIORARI

IKeisha Perry  
vs Appellant

2022-CP-40-03043

Motion for a writ

of Certiorari

The State  
Respondent

S.C.A.C.R Rule 4

The appellant files this motion for a writ of certiorari pursuant to S.C.A.C.R Rule 4 from the denial of Habeas Corpus Relief Act. The circuit court judge (code 274) dismissed the (Habeas) absent the Atty Gens failure to respond to the claim. In lieu of the statute of limitations had expired according to S.C.A.C.R Rule 11 and the Anti death penalty act all cases must be disposed of within 1 year. This case at bar was decided after a 2 1/2 year status. The appellant is appealing the 2022 conviction

IKeisha Perry #282078  
Pro Se Appellant

Leath Correctional Institute  
Laurel 2-205B  
2809 Airport Rd  
Greenwood, SC 29104

The State of South Carolina  
In the Supreme Court

IKeisha Perry  
vs,  
The State

2022-CP-40-03043

The (Appellant) files this  
motion for an Injunction  
Relief S.C.R.C.P Rule 65g  
AFFIDAVIT of Service

The (Appellant) moves upon the above court  
on said motion, pursuant to

S.C.R.C.P Rule 65g for an Injunction Relief of  
this conviction the state had no activity in her  
claim for a period of (3) three years.

The statute of limitations had expired to reply  
to the claim The (Appellant) was prejudice  
by the state and chief administrative judge  
for failing to order the (Atty. Gen) to show  
cause as to why, the state did not respond to  
the claim

The state failed to file for enlargement of  
time in which to reply to the (Habeas Corpus  
Act).

pursuant to S.C.R.C.P Rule 11 The (Appellant)  
has been deprived of a Due process Right, for  
a Joinder appeal based on codefendants  
conviction being overturned

IKeisha Perry  
Feb. 4 2025

James G. Cull  
Feb 4<sup>th</sup> 2025

July 20<sup>th</sup> 2033

SC



State of South Carolina

In the Supreme Court

Ikeisha Perry  
vs.

2022 CP 40-030-043

Motion to Alter the  
judgement pursuant  
to SCRPC Rule 59(e)

AFFIDAVIT OF SERVICES

The State

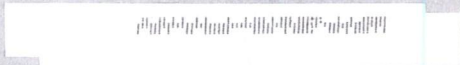
We (Appellant) files this motion to alter the  
order of judgement pursuant to S.C.R.C.P  
Rule 59(e)

Based on After-discovered evidence, co-  
defendant joint trial conviction was reversed.  
The (Appellant) Atty did not file a motion  
for joinders claim on co-defendant. Appeal  
which was reversed. (The Appellant) was  
deprived of equal protection of the Due  
process clause the 14<sup>th</sup> Amendment U.S.C.A  
being that conviction was a result of a joint  
trial.

Ikeisha Perry  
Feb 4, 2025



Iheisha Perry #282078 L2-205B  
Leath Correctional Institution  
2809 Airport Road  
Greenwood SC 29649



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Supreme Court  
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Columbia, S.C. 29211

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