STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Florence County

Honorable H. Steven DeBerry IV, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

MEASHA JAQUETTA SHAWNIC JOYNER,

APPELLANT

APPELLATE CASE NO. 2024-000274

FINAL BRIEF OF APPELLANT

JORDAN WAYBURN
Appellate Defender

South Carolina Commission on Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589
(803) 734-1330

ATTORNEY FOR APPELLANT

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STATEMENT OF ISSUES ON APPEAL

1. Did the trial court err in failing to charge the jury on self-defense where there was evidence someone else "started shooting first"?

2. Did the trial court err by denying appellant credit for time served in home confinement on the basis that she was arrested for a charge which was dismissed?

STATEMENT OF THE CASE

Measha Joyner was indicted on August 22, 2019, by the Florence County grand jury for the murder of Chelsea Plowden and for several related offenses. R. 647-649. On December 4–8, 2023, Measha went to trial before Judge Steven DeBerry, IV and a jury. R. 1. She was represented by Rose Mary Parham, and Todd Tucker prosecuted the case for the state. R. 1. She was tried for murder and possession of a weapon during the commission of a violent crime, as well as two attempted murder charges that the state dismissed at the close of its case in chief. R. 14:4-15:14, 481:14-23.

The jury ultimately acquitted Measha of murder, but it convicted her of the lesser-included offense of voluntary manslaughter and on the possession of a weapon charge. R. 625:5-15. Measha requested credit for her time served in home confinement. R. 633:7-12. The trial court indicated it would take that motion under advisement but otherwise sentenced her to twenty-five years in prison. R. 637:4-638:9. In a written order dated April 4, 2024, the court denied the motion. R. 655.

This appeal follows.

STATEMENT OF FACTS

Measha Joyner and her sister Jolica Joyner[1] attended a birthday party on the night of March 23, 2019. R. 107:13-108:16. The party was at a Quick Stop on Coit Street in Florence, and the Joyners were driven there by Jolica's neighbor, Tanisha Timmons. R. 289:16-290:24. It was a dual birthday party for Carlos Jackson (also known as Stew) and Gloria Whitehead. R. 133:16-20, 207:18-208:2. Gloria's daughter, Deandra Whitehead, was at the party with her girlfriend Kanisha Allen. R. 208:22-209:2, 226:13-18. At some point later in the night, Measha, Jolica, Deandra, and Allen began physically fighting in the parking lot. R. 135:6-19. Measha was fighting Deandra, and Jolica was fighting Allen. R. 211:4-21.

Stories vary as to precisely what happened in the parking lot and how long events took to unfold. Several witnesses testified that at some point Jackson fired his gun up in the air in an attempt to stop the fight between Jolica and Allen. R. 211:24-212:1, 278:10-19, 317:15-19. Jackson testified he saw "everybody" fighting outside, he could not identify who was fighting, and he fired his gun one time "to disperse everybody." R. 109:11-18, 115:2-25. After that, he went back inside the Quick Stop until he heard more gunfire approximately one minute later. R. 109:23-110:15. He did not see who was shooting then. R. 110:3-14, 121:16-18.

Gloria Whitehead testified she broke up the fight between Measha and Deandra "a good bit" prior to Jackson firing his weapon. R. 211:24-212:12. She testified that while Jolica and Allen continued to fight, she put Measha in the backseat of a white car with four doors. R. 212:11-213:14. At that point Measha agreed to stay in the car and told Gloria to "just go get my sister please." R. 213:17-20. Gloria testified Jolica and Allen stopped fighting only when Jackson fired

[1] At least one document spells Measha's sister's name "Jolicia." R. 640. The transcript, however, reports it "Jolica" so that spelling is used here.

his gun and that it took Jolica approximately fifteen to twenty minutes after that to get in the car to leave. R. 214:6-13, 216:11-16. According to Gloria, when Jolica got in the car to leave Chelsea Plowden, a party guest, was shot in the head. R. 217:3-8. Gloria testified Measha was the one firing; however, on the night it occurred she told several people "Jojo"—Jolica—shot and killed Plowden. R. 217:17-218:3, 220:8-14, 223:12-14, 281:7-12. She testified that was "by mistake" and she "was trying to say Jolica sister [sic]" shot Plowden. R. 223:12-17.

Timmons testified that as she, Measha, and Jolica left the Quick Stop building the sisters were "grabbed," "like grabbing them to fight them." R. 292:13-16, 299:16-25. Timmons testified it was her who put Measha in the car after Measha's fight broke up. R. 292:20-21. When Timmons did that, she "heard gunshots ring out" before she went to find Jolica. R. 293:2-23. She specified she heard the shots "when" she put Measha in the car. R. 301:3-7. Then, as she pulled out of the parking lot after she found Jolica, she heard gunshots coming from her backseat where she knew Measha was. R. 293:17-294:9.

Jamie Zimmerman, another party guest, stated on an officer's body camera that it was "people shooting back and forth." Def. Ex. 8 at 00:38–00:41. Defendant's Exhibit 8 is on file with this Court, and it was admitted and played for the jury without objection. R. 509:1-510:20. Zimmerman believed "somebody by [Plowden] shot her, not the people on the other side." Def. Ex. 8 00:41–45. Zimmer explained, "The other people, her friends, started shooting first. Her friends started shooting first before the other people started shooting." Def. Ex. 8 at 3:43–3:50. She clarified she was not talking about Jolica but rather, "The one in the white Mercedes that was shooting -- they was her friends, they left, and I really think they was the one that shot her because of the way she got hit on that side of her head. . . . The other people was basically shooting in the air." Def. Ex. 8 at 3:58–4:15. In the context of the whole video, it is clear Zimmerman uses "her

friends" to mean someone other than appellant because she then specified that she does not know what vehicle "Jojo" was in except that it was silver or white. Def. Ex. 8 at 4:28–4:35. However, she knew "that boy went to get his gun, he was like, he was in the white Mercedes and he was like, 'I'll light this bitch up out here.'" Def. Ex. 8 at 4:35–4:45.

Deandra Whitehead testified that after she stopped fighting with Measha, her mother told her to leave but Jolica and Allen were still fighting. R. 252:23-253:12. After Jackson fired his gun, Deandra and Allen left in a truck with Allen's family. R. 254:1-8. After they dropped Allen's family off, they received a call and learned Plowden had been killed. R. 254:14-255:9. Deandra believed about twenty or thirty minutes passed between her leaving and receiving that phone call. R. 256:15-19. She left about five minutes after Jackson fired. R. 257:11-17.

Angela Robinson, Jamares Robinson, and Brianna Robinson were all also at the birthday party that night. R. 113:17-115:1. Angela is Jamares and Brianna's mother. R. 134:4-15. Angela did not know what caused the fights to break up. R. 136:21-24. She testified after the fights ended she was in her car with Brianna, backed into a spot with a view of the parking lot. R. 136:17-138:6. She testified that Jolica, Measha, and a third person then "jump[ed] into a white vehicle." R. 138:8-12. She testified she saw Measha enter the backseat and Jolica enter the front. R. 139:12-14. As the car pulled out of the parking lot, Angela saw Measha in the backseat firing at "the crowd of people" as they drove away. R. 138:18-24. At the same time some people in the crowd began firing at the car. R. 140:18-21. One of those people shooting was her son Jamares, although Angela claimed Measha started shooting first. R. 140:18-141:5. She estimated three shots came from the car. R. 146:1-7.

Brianna Robinson testified that she and her mother were inside the Quick Stop when she heard a gunshot and the two then went to see the fighting outside. R. 339:16-25. She also could

not identify who was fighting. R. 339:6-15, 347:2-4. She testified that after Deandra and Allen left, she heard a "second shot" after the fight broke up. R. 340:22-25. She then heard more gunshots and looked in the direction of the sound to see Measha "hanging out the window shooting." R. 341:3-342:18. Brianna testified she was close enough to that "second shot" to feel the heat of it. R. 348:6-349:4, 350:19-24. Brianna did not know if Jackson fired the second shot. R. 349:5-12. She estimated those two shots were a minute and a half apart. R. 350:19-351:4. She testified her brother was "defending himself" when he shot at the car as it drove away. R. 353:18-22.

Like Gloria, Jamares Robinson testified it was probably ten or fifteen minutes after Jackson first fired that more guns began firing. R. 321:4-12. Jamares testified those shots came from the car Measha and Jolica entered and he then started shooting at the car as he ran across the parking lot as it drove away. R. 321:13-323:2.

Officers recovered three weapons that were fired at the scene. Jamares Robinson turned in an FMK nine millimeter to Investigator Stephen Banister, which was made State's Exhibit 112 at trial. R. 323:15-24, 368:20-369:18, 640. Demarcus Bluett turned in a .380 Hi-Point, which was made State's Exhibit 111 at trial. R. 369:19-10, 446:14-18, 640. Carlos Jackson turned in a Smith and Wesson forty caliber pistol, which was made State's Exhibit 113 at trial. R. 111:12-19, 370:14-371:4, 446:19-24, 641. All three of those weapons fired casings recovered from the scene. R. 642-43.

SLED Agent Chad Smith, an expert in firearms identification, testified shell casings from four different weapons were recovered from the scene. R. 451:5-23. Captain Stephen Starling of the Florence Police Department testified about a map of the scene and different known locations. R. 177:3-13; State's Ex. 2. He testified two spent bullet casings (of different calibers) and three

live rounds were found in the vicinity of Plowden's body. R. 177:14-178:4. He also described three more casings nearby, again of different calibers. R. 177:17-23. Markers eight, nine, and ten were three nine millimeter casings by the parking lot exit. R. 178:4-6; State's Ex. 2. Agent Smith testified those bullets were fired by a weapon law enforcement officers did not recover. R. 438:8-15, 453:15-454:24, 643. The location where Plowden was struck is in an approximate line with the location of those unidentified casings and the other known casings. State's Ex. 2.

After the close of its case, the state dismissed the attempted murder charges. R. 481:9-23. Measha introduced several videos from officer's body cameras, including Defendant's Exhibit 8 discussed above, and published them to the jury. R. 508:17-509:11. The trial court instructed the jury on the lesser included offenses of voluntary and involuntary murder, and it refused to charge the jury on self-defense. R. 523:17-19, 530:1-3, 603:2-606:8. The trial court did however charge the jury on the "defense of necessity":

> In order to excuse the crime on the ground of necessity, the defendant must show by a preponderance or greater weight three things. Number one, that there was a present . . . and imminent emergency which arose without fault on the part of the defendant. The emergency was the type which would cause a well-grounded fear of death or serious bodily harm if the act was not done. And finally there was no other reasonable alternative other than committing the crime to avoid the threat of harm.

R. 607:19-608:2.

During deliberations the jury requested further instruction on the definition of murder. R. 622:18-623:17, 645. The jury ultimately acquitted Measha of murder and found her guilty of voluntary manslaughter, and it found her guilty of possession of a weapon during the commission of a violent crime. R. 625:5-14.

At sentencing Measha requested credit for her three years served on monitored home confinement. R. 633:7-12. The solicitor argued she should not receive that credit because "she

picked up a charge of trafficking narcotics in Richland County." R. 636:8-13. That charge was ultimately dismissed, and Measha argued it was "dismissed quickly" because it was "not founded." R. 636:19-21. Measha's monitoring report revealed no violations. R. 654. The trial court indicated it would take that motion under advisement but otherwise sentenced her to twenty-five years in prison. R. 637:4-638:9. In a written order dated April 4, 2024, the court denied the motion. R. 655.

STANDARD OF REVIEW

"In criminal cases, the appellate court sits to review errors of law only." *State v. Baccus*, 367 S.C. 41, 48, 625 S.E.2d 216, 220 (2006) (quoting *State v. Wilson*, 345 S.C. 1, 5, 545 S.E.2d 827, 829 (2001)). "If there is any evidence in the record from which it could reasonably be inferred that the defendant acted in self-defense, the defendant is entitled to instructions on the defense, and the trial judge's refusal to do so is reversible error." *State v. Slater*, 373 S.C. 66, 70, 644 S.E.2d 50, 52 (2007) (quoting *State v. Muller*, 282 S.C. 10, 10, 316 S.E.2d 409, 409 (1984)). Whether "any evidence" exists to warrant the charge is a question of law this Court reviews de novo on appeal. *State v. Williams*, 427 S.C. 246, 249, 830 S.E.2d 904, 906 (2019).

ARGUMENT

I. Jamie Zimmerman's statements supported a charge on self-defense because she stated someone shot at Measha first.

"If there is any evidence in the record from which it could reasonably be inferred that the defendant acted in self-defense, the defendant is entitled to instructions on the defense, and the trial judge's refusal to do so is reversible error." *State v. Light*, 378 S.C. 641, 650, 664 S.E.2d 465, 469 (2008) (quoting *Slater*, 373 S.C. at 70, 644 S.E.2d at 52). "When reviewing the circuit court's refusal to deliver a requested jury instruction, appellate courts must consider the evidence in a light most favorable to the defendant." *State v. Williams*, 400 S.C. 308, 314, 733 S.E.2d 605, 608-09 (Ct. App. 2012) (quoting *State v. Cole*, 338 S.C. 97, 101, 525 S.E.2d 511, 512-13 (2000)).

Measha was entitled to a self-defense charge because there was evidence presented to the jury that she did not start the shooting. While the testimony and evidence about what exactly happened in the parking lot varied, one part was clear: Jamie Zimmerman stated "her friends"—meaning Plowden's friends in the white Mercedes—"started shooting first before the other people started shooting." Zimmerman also specified she believed someone "by" Plowden shot her, which indicates gunfire was coming from Plowden's direction. That direction also matches the rough line formed by the unidentified shell casings found at the scene and those fired by Carlos Jackson and Jamares Robinson, a line which overlaps with Plowden's location. In other words, there is evidence Measha was firing at her attackers who were next to or in line with Plowden.

That evidence is what matters most for purposes of a self-defense instruction. If someone is being shot at, they can generally defend themselves. Therefore the trial court erred by summarily concluding, "I don't find that it's a self-defense case. Self-defense has not been alleged in this case." R. 530:1-3. That decision was incorrect because evidence existed to warrant the charge. Measha even began her closing argument with Zimmerman's statement quoted above. R. 559:22-

560:13. She argued, "She said this man in a white Mercedes shot. I am scared one of her friends shot her. You know, I am going to light this bitch up, that's how this started." R. 561:8-10. That is evidence which entitled Measha to a jury charge on self-defense.

Other evidence supported the charge as well. Zimmerman's statement was consistent with Brianna Robinson's testimony she heard an unidentified "second shot" after Jackson broke the fight up because she knew only that the subsequent shots came from the Joyners' vehicle. That can be true *and* the first shot in the firefight could have been at Measha, which is precisely what Timmons testified: she heard gunshots when she put Measha into the car. Therefore, especially in conjunction with Zimmerman's clear statement, there was certainly "any evidence" to support the charge.

More specifically,

> To establish self-defense in South Carolina, four elements must be present. First, the defendant must be without fault in bringing on the difficulty. Second, the defendant must have been in actual imminent danger of losing his life or sustaining serious bodily injury, or he must have actually believed he was in imminent danger of losing his life or sustaining serious bodily injury. Third, if his defense is based upon his belief of imminent danger, a reasonably prudent man of ordinary firmness and courage would have entertained the same belief. If the defendant was actually in imminent danger, the circumstances were such as would warrant a man of ordinary prudence, firmness and courage to strike the fatal blow in order to save himself from serious bodily harm or losing his own life. Fourth, the defendant had no other probable means of avoiding the danger.

State v. Bryant, 336 S.C. 340, 344-45, 520 S.E.2d 319, 321-22 (1999) (citing *State v. Goodson*, 312 S.C. 278, 280, 440 S.E.2d 370, 372 (1994)).

On the facts presented to the jury, there should be no argument that Measha was at fault as a matter of law for bringing on the difficulty. According to Gloria Whitehead, Measha had stopped fighting Deandra—and Deandra had left—approximately fifteen or twenty minutes before the

shooting involving Measha began. Jamares Robinson similarly testified it was ten to fifteen minutes between when Jackson shot in the air to break up Jolica and Allen's fight and when gunfire began again. Given that delay, and since Zimmerman stated and Timmons's testimony indicates Measha was shot at first, there is evidence from which the jury could reasonably conclude Measha was without fault.

Further, accepting that there is evidence she was shot at first, the only evidence of any fault on Measha's behalf might be her earlier fight with Deandra. But Deandra had already left the scene by the time the shooting started, and that could have been over fifteen minutes earlier. *See* 30 Corpus Juris, *Homicide* § 210, at 45-46 (1923) (noting an aggressor who "in good faith withdraws from the combat in such a manner as to show his adversary his intention in good faith to desist" can still obtain the defense); *Bryant*, 336 S.C. at 345-46, 520 S.E.2d at 322. According to Gloria, Measha had withdrawn and was waiting in the car for her sister. Moreover, no evidence whatsoever could support the conclusion that Measha was an aggressor as to anyone other than Deandra, but Deandra had already left the scene.[2] Thus, whether Measha was legally at fault for creating the violence out of the earlier fight was at the least a jury question.

Next, it cannot be suggested that someone being shot at fails the "actual imminent danger of losing his life" element of self-defense. Nor was it unreasonable as a matter of law for Measha to return fire in the hopes of subduing the aggressor. *See State v. Scott*, 424 S.C. 463, 472, 819 S.E.2d 116, 120 (2018) (quoting *State v. Dickey*, 394 S.C. 491, 501, 716 S.E.2d 97, 102 (2011)) (affirming immunity where defendant established self-defense because "[a] person has the right to act on appearances, even if the person's belief is ultimately mistaken," where he killed a bystander

[2] Additionally, Timmons testified Measha and Jolica were attacked first as they walked out of Quick Stop, so the jury could conclude she was not at fault even for that earlier fight.

who had not actually fired at him).[3] Finally, Measha had no alternative means of escape—she was already in a moving car; nothing more could be done. She did not have a legal obligation to sit idly by while being fired upon. There is a legitimate way in which she had no other means of escape precisely because she was trapped in a moving car. *See* 30 Corpus Juris, *Homicide* § 239, at 68-69 ("Where accused already has his back to the wall . . . he is not obligated to retreat or escape before taking life in self-defense."). Importantly, whether she could escape or her fear was reasonable are questions of fact for the jury. *See Dickey*, 394 S.C. at 502, 716 S.E.2d at 103 ("[T]he State failed to disprove beyond a reasonable doubt that Petitioner had no other probable means of avoiding the danger."). Taken together, and in a light favorable to Measha, there is evidence in the record to support a charge on self-defense, and so the trial court erred by denying it.

Finally, the fact the trial court charged the jury on the "defense of necessity" demonstrates its error in refusing to charge self-defense. As given, in context, that charge was functionally a self-defense charge except in one critical way: it placed the burden on Measha to prove the

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[3] Other jurisdictions have long recognized the theory that one acting in self-defense is still entitled to the defense even if he unintentionally hits or kills an innocent bystander. *See, e.g.*, *State v. Greenfield*, 847 S.E.2d 749, 755 (N.C. 2020) (quoting *State v. Dalton*, 101 S.E. 548, 549 (N.C. 1919)) ("[I]f the killing of the person intended to be hit would, under all the circumstances, have been excusable or justifiable on the theory of self-defense, then the unintended killing of a bystander by a random shot fired in the proper and prudent exercise of such self-defense is also excusable or justifiable."); *Crawford v. State*, 480 S.E.2d 573, 575 (Ga. 1997) (citations omitted) (describing the "the principle of 'transferred justification'" under which "no guilt attaches if an accused is justified in shooting to repel an assault, but misses and kills an innocent bystander"); *see also* 30 Corpus Juris, *Homicide* § 271, at 88 ("The unintentional killing of a bystander by a random shot fired in the proper and prudent exercise of the right of self-defense is excusable or justifiable if the killing of the party intended to be killed would, under all the circumstances, have been excusable or justifiable as in self-defense."). However, South Carolina courts have declined to determine if the rule applies. *Jamison v. State*, 410 S.C. 456, 471, 765 S.E.2d 123, 131 (2014) ("The transferability of intent in a self-defense claim has not been recognized in South Carolina, and Respondent does not ask this Court to recognize it now."); *State v. Porter*, 269 S.C. 618, 622, 239 S.E.2d 641, 643 (1977) (declining to determine if "transferred self-defense" is a viable theory).

necessity while the state is required to disprove self-defense beyond a reasonable doubt. *Dickey*, 394 S.C. at 499, 716 S.E.2d at 101 (citing *State v. Wiggins*, 330 S.C. 538, 544, 500 S.E.2d 489, 492 (1998)) ("[W]hen a defendant claims self-defense, the State is required to disprove the elements of self-defense beyond a reasonable doubt."). In addition, charging necessity while not charging self-defense is unnecessarily confusing.

II. **The trial court erred in denying credit for time served on house arrest.**

At sentencing the trial court reserved ruling on Measha's request for credit for time served on house arrest. The court asked the parties for her monitoring report and any violations and alleged violations. R. 637:8-14. The monitoring report revealed no violations. R. 654.

Section 24-13-40 of the South Carolina Code governs the computation of time served. It provides:

> In every case in computing the time served by a prisoner, full credit against the sentence must be given for time served prior to trial and sentencing, and may be given for any time spent under monitored house arrest. Provided, however, that credit for time served prior to trial and sentencing shall not be given: (1) when the prisoner at the time he was imprisoned prior to trial was an escapee from another penal institution; . . . (3) when the prisoner commits a subsequent crime while out on bond; or (4) has bond revoked on any charge prior to trial or plea.

§ 24-13-40. The court denied Measha credit for her time on house arrest because she was "charged while on monitored house arrest in this matter with a drug trafficking charge that was later dismissed prior to this trial." R. 654.

While the statute vests the trial court with some discretion, that discretion is not limitless. The trial court committed an error of law in denying credit for the time due to the dismissed drug charge. For all the trial court knew, the charge was dismissed because it was filed in error against the wrong person. Or perhaps there was no evidence to support it. At trial, Measha tried to explain

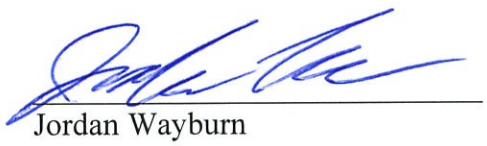
this to the court and argued the charge was "not founded" and "completely dismissed." R. 636:19-21.

A dismissed charge is one that legally "never existed." *Mackey v. State*, 357 S.C. 666, 669, 595 S.E.2d 241, 243 (2004); *see generally* 16 Corpus Juris, *Criminal Law* § 779, at 432-33 (1918) (explaining a "nolle prosequi" has the effect of "leav[ing] the matter in the same condition in which it was before the commencement of the prosecution").[4] Because the charge never existed, to deny her credit on that basis is to effectively deny her for no reason at all, and that is not within the discretion of the court.

[4] *See In re Oxner*, 440 S.C. 5, 11 n.5, 889 S.E.2d 586, 589 n.5 (2023) (defining "nolle prosequi" and explaining it is "an archaic way to describe a dismissal without prejudice").

CONCLUSION

For the foregoing reasons, appellant respectfully requests the Court reverse her conviction and remand the case for a new trial.



Jordan Wayburn
Appellate Defender

ATTORNEY FOR APPELLANT

This 28th day of August, 2025.

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SC Court of Appeals

CERTIFICATE OF COUNSEL

The undersigned certifies that to the best of my ability this final brief of appellant 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."

Jordan Wayburn
Appellate Defender

South Carolina Commission on Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589
(803) 734-1330

ATTORNEY FOR APPELLANT

This 28th day of August, 2025.

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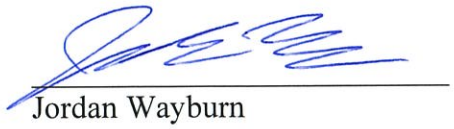
MEASHA JAQUETTA SHAWNIC JOYNER,

APPELLANT

APPELLATE CASE NO. 2024-000274

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Final Brief of Appellant in the above-referenced case has been served upon Brian H. Gibbs, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 28th day of August, 2025.



Jordan Wayburn
Appellate Defender

South Carolina Commission on Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589
(803) 734-1330

ATTORNEY FOR APPELLANT

From: Stock, Chris
To: Brian Gibbs; gracesommer@scag.gov
Cc: Wayburn, Jordan
Subject: 2024-000274 - The State v. Measha Joyner - Final Brief of Appellant
Date: Thursday, August 28, 2025 3:36:00 PM
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Mr. Gibbs,

Attached for service is the Final Brief of Appellant for Measha Jaquetta Shawnic Joyner's appeal which will be filed with the Court of Appeals today.

If you have any questions, please let me know.

Thank you,

Chris Stock
Administrative Coordinator
Commission on Indigent Defense
Appellate Division
(803) 734-1330