

STATE OF SOUTH CAROLINA) IN THE COURT OF GENERAL SESSIONS

)

COUNTY OF BERKELEY) CASE NO.: 2024A1820500652

)

STATE OF SOUTH CAROLINA)

)

vs.) MOTION TO RELIEVE COUNSEL

)

APRIL LILLISTON) Defendant, Pro Se

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SEP 02 2025

SC Court of Appeals

COMES NOW the Defendant, April Lilliston, appearing pro se, and respectfully moves this Honorable Court to relieve her currently assigned public defender, Julie Shivers, and allow the Defendant to either proceed pro se or with reassigned counsel unconnected to the Berkeley County Public Defender's Office.

GROUND FOR THIS MOTION:

1. **A formal complaint** has been filed by the Defendant against Julie Shivers with the **South Carolina Office of Disciplinary Counsel (ODC)** due to her failure to provide effective assistance of counsel and failure to act in the Defendant's best interest.
2. Counsel failed to file **timely motions** the Defendant requested, including a **motion to dismiss, motion to modify bonds, and motions to present key evidence**, despite having had adequate time and notice.
3. The Defendant was **convicted without the presence of the key witness**, yet counsel allowed the trial to proceed and failed to properly object or move for a mistrial.
4. Counsel has failed to maintain meaningful communication and **pushed for probation against the Defendant's will**, despite the Defendant's continued assertion of innocence and preference to serve time rather than accept an unjust plea.

5. The attorney-client relationship has completely **broken down**, and the Defendant has **no confidence** that current counsel can or will protect her legal rights during post-trial or appellate proceedings.
 6. Current counsel's continued representation would violate the Defendant's **Sixth Amendment right to effective assistance of counsel** and **Fourteenth Amendment right to due process**.
-

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

- Relieve Julie Shivers as appointed counsel.
- Appoint new counsel from outside the current Public Defender's Office or permit the Defendant to proceed **pro se** in all further matters.

Respectfully submitted this 19th day of August, 2025.

April Lilliston, Pro Se



PO Box 5

Sandy Springs, SC 29677

(786) 234-2201

lilliston00@yahoo.com

CERTIFICATE OF SERVICE

I, April Lilliston, hereby certify that I have on this day served a true and correct copy of the foregoing:

- Motion to Relieve Counsel

upon the following parties by U.S. Mail, properly addressed and with adequate postage:

Solicitor's Office – Ninth Judicial Circuit
300-B California Avenue
Moncks Corner, SC 29461

Julie Shivers, Public Defender
Berkeley County Public Defender's Office
105 Gulledge Street
Moncks Corner, SC 29461

Respectfully submitted,



April Lilliston, Pro Se

Date: 8/19/2025

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SC Court of Appeals



**LEAH GUERRY DUPREE
CLERK OF COURT
BERKELEY COUNTY
GENERAL SESSIONS**

POST OFFICE BOX 219
MONCK'S CORNER, SOUTH CAROLINA 29461-0219
(843) 719-4400 (843) 567-3136 (843) 723-3800

TO: April Lilliston

RE: Appeal

The enclosed document is being returned for the following reason(s):

- This Order needs to be sent to Berkeley County General Sessions Administrative Judge for Signature.
- Requires original signature.
- This document is a copy. We must file original.
- We do not do criminal records check.
- This is not a Berkeley County Case.
- Please provide case number.
- Attached is the requested information.
- Contact Court Administration for transcript at the following address:
1220 Senate Street, Suite 200, Columbia, SC 29201-3739
- Information may be obtained from our web-site at www.berkeleycountvsc.gov.
- Other We have filed this notice in our court. The Clerk of Court does not file or transmit anything to the South Carolina Court of Appeals.

Please make the necessary corrections and return this document for filing.
Thank you for your assistance.

Staff Initials SLM

Date 8-11-2025



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
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August 22, 2025

Ms. Julie Marie Shivers, Esquire
105 Gullege St
Suite E
Moncks Corner SC 29461

Re: The State v. April J. Lilliston
Appellate Case No. 2025-001673

Dear Counsel:

Pursuant to Rule 264, SCACR, you are considered counsel of record for the appellant, Ms. Lilliston.

Upon reviewing your client's notice of appeal, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or this matter will be dismissed:

- The caption/title does not comply with Rule 267(a), SCACR. Specifically, the notice of appeal is not in the proper format as shown in Form 1 in Appendix C to part II of the SCACR. The notice of appeal does not list counsel for the respondent and the judge of the underlying case.
- The notice of appeal is not accompanied by the order(s) and/or judgment(s) challenged on appeal.
- A proof of service has not been provided showing service upon the correct attorney for the respondent. You must serve and file a proof of service