

RECEIVED

Sep 18 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE YORK COUNTY  
COURT OF COMMON PLEAS

ORIGINALLY ORDERED & REDIRECTED BY  
THE HONORABLE DANIEL DEWITT HALL, CIRCUIT COURT JUDGE (RETIRED)

AND DENIED FOR RECONSIDERATION BY  
THE HONORABLE WILLIAM A. MCKINNON, CIRCUIT COURT JUDGE

---

YORK COUNTY DOCKET NO. 2021-CP-46-2853

---

In the Matter of the Care and Treatment of Tyrell Neely, Appellant

---

**MOTION TO SUBSTITUTE COUNSEL  
AND TO BE RELIEVED AS COURT-APPOINTED COUNSEL**

---

The undersigned counsel, Kindle Kay Johnson, hereby makes this Motion to Substitute Counsel and to Be Relieved as Court-Appointed Counsel for Tyrell Neely. Mr. Neely was determined to be indigent at the trial level, and on October 4, 2021, Attorney Johnson was appointed to represent him pursuant to Rule 608, SCACR; she has served as his trial counsel since.

Attorney Johnson is informed and believes that Mr. Neely remains indigent and is unable to afford the costs of retaining counsel for this appeal. She therefore moves this Court to relieve her as the trial and appellate attorney of record in this case, and to appoint *South Carolina Commission on Indigent Defense* as Mr. Neely's counsel of record (1330 Lady Street, Suite 401, P.O. Box 11589, Columbia, SC 29201).

Respectfully Submitted,

s/Kindle K. Johnson

Kindle K. Johnson  
S.C. Bar No. 72926  
K. Johnson Law Firm

Mailing Address

223 E Main St, Suite 500  
Rock Hill, SC 29730  
803.329.1900

[kjohnson@kjohnsonlawfirm.com](mailto:kjohnson@kjohnsonlawfirm.com)

ATTORNEY FOR APPELLANT

September 18, 2025

**RECEIVED**

**Sep 18 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE YORK COUNTY  
COURT OF COMMON PLEAS

ORIGINALLY ORDERED & REDIRECTED BY  
THE HONORABLE DANIEL DEWITT HALL, CIRCUIT COURT JUDGE (RETIRED)

AND DENIED FOR RECONSIDERATION BY  
THE HONORABLE WILLIAM A. MCKINNON, CIRCUIT COURT JUDGE

---

YORK COUNTY DOCKET NO. 2021-CP-46-2853

---

In the Matter of the Care and Treatment of Tyrell Neely, Appellant

---

**PROOF OF SERVICE**

---

---

The undersigned hereby asserts she has served a copy of the *Notice of Appeal; Motion to Proceed In Forma Pauperis; Motion to File Record on Appeal, Final Brief, Final Reply Brief and Other Documents Without Bindings and Covers and With Fewer Copies as Required by Rule 267(d), SCACR; Motion to Substitute Counsel and to Be Relieved as Court-Appointed Counsel; and Letter to York County Clerk of Court* on the below listed parties at their stated email addresses (or postal addresses if specifically indicated below), by attaching a copy of the same on September 18, 2025 addressed as follows:

James Fisher, Esq.  
*Attorney for the State*  
SC Office of the Attorney General, SVP Unit  
P.O. Box 11549  
Columbia, SC 29211  
[jimfisher@scag.gov](mailto:jimfisher@scag.gov)

Christopher Runyan, Esq.  
*Attorney for the State*  
SC Office of the Attorney General, SVP Unit  
P.O. Box 11549  
Columbia, SC 29211  
[crunyan@scag.gov](mailto:crunyan@scag.gov)

Don A Thompson  
***Guardian ad Litem for T. Neely***  
107 Smithwood Court  
Simpsonville, SC 29681  
[thompson\\_legal@aol.com](mailto:thompson_legal@aol.com)

SC Commission on Indigent Defense  
1330 Lady Street, Suite 401  
P.O. Box 11589  
Columbia, SC 29201  
[dwhite@sccid.sc.gov](mailto:dwhite@sccid.sc.gov)  
[dalexander@sccid.sc.gov](mailto:dalexander@sccid.sc.gov)  
[ghjohnson@sccid.sc.gov](mailto:ghjohnson@sccid.sc.gov)

**VIA EMAIL & US MAIL**

The Honorable Angie Bryant  
York County Clerk of Court- CP  
PO Box 649  
York, SC 29745-0649  
[Angie.Bryant@yorkcountygov.com](mailto:Angie.Bryant@yorkcountygov.com)  
[Michelle.Wofford@yorkcountygov.com](mailto:Michelle.Wofford@yorkcountygov.com)

**VIA US MAIL**

Tyrell Neely  
4546 Broad River Rd.  
Columbia, SC 29210

September 18, 2025

Respectfully Submitted,

s/Kindle K. Johnson

---

Kindle K. Johnson  
S.C. Bar No. 72926

Mailing Address

K. JOHNSON LAW FIRM

223 E Main St, Suite 500

Rock Hill, SC 29730

803.329.1900

[kjohnson@kjohnsonlawfirm.com](mailto:kjohnson@kjohnsonlawfirm.com)

ATTORNEY FOR APPELLANT