

LAWRENCE L. CRAWFORD AKA
JONAH GABRIEL JAHJAH T. TISHBITE
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RECEIVED

Jan 28 2026

SC Court of Appeals

YAHDNA OVERSTREET-U-DEEN
15306 ROBEY AVENUE SUITE 707
HARVEY, ILLINOIS 60426

IN RE: CASE 2025-001856 AND FILING PETITION FOR WRIT OF MANDAMUS
IN THE SOUTH CAROLINA SUPREME COURT TO SEEK THAT THE S.C. COURT
OF APPEALS REMOVE THE APPOINTED COUNSEL IN THIS CASE DUE TO
CONFLICT OF INTEREST AND GIVING THE S.C. COURT OF APPEALS NOTICE
THAT YAHDNA OVERSTREET-U-DEEN MOTION TO INTERVENE IN THIS
APPEAL.

TO: THE S.C. COURT OF APPEALS,
CHIEF JUDGE WILLIAMS ET. AL.,

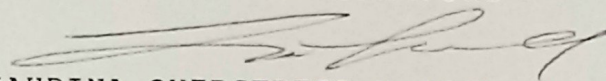
ATTACHED JUDGE WILLIAMS AND THE S.C. COURT OF APPEALS WILL
FIND TO BE FILED UNDER CASE 2025-001856 A COPY OF A PETITION FOR
WRIT OF MANDAMUS THAT WAS FORWARDED TO THE SOUTH CAROLINA SUPREME
COURT. THE PARTIES GIVE THE S.C. COURT OF APPEALS JUDICIAL NOTICE
THAT YAHDNA OVERSTREET-U-DEEN MOTIONS TO INTERVENE IN THIS
APPEAL. HER NAME WAS LISTED AS A DIRECT PARTY WITHIN THE KERSHAW
COUNTY COURT OF GENERAL SESSIONS WHERE THE GENERAL SESSIONS COURT
IN FURTHER ACTS OF FRAUD UPON THE COURT FAILED TO GIVE HER NOTICE
OF ANY SCHEDULED HEARING THAT OCCURRED SEPTEMBER 13, 2025. THIS
PLEADING CONSTITUTION MOTION FOR INCLUSION OF YAHDNA
OVERSTREET-U-DEEN AS AN OFFICIAL PARTY ON THIS APPEAL. AS A
DIRECT PARTY IN THE KERSHAW COUNTY COURT OF GENERAL SESSIONS, THE

CONSPIRING STATE AND COUNTY ACTORS WERE SO BUSY ENGAGING IN FRAUD. THE COURT NEVER GAVE OVERSTREET-U-DEEN NOTICE OF THE HEARING VIOLATING DUE PROCESS LAW AND THE CONSTITUTION RESULTING IN AN VOID JUDGMENT. SHE MUST ALSO BE PERMITTED TO FILE BRIEF TO ENSURE THAT HER INTEREST ARE PRESERVED AND SHE CHOOSES TO DO IT PRO SE. YAHDINA OVERSTREET-U-DEEN WAS ALSO PARTY IN THESE MATTERS BEFORE THE SOUTH CAROLINA SUPREME COURT ESTABLISHING RIGHTS OF RES JUDICATA AND COLLATERAL ESTOPPLE AS IT PERTAINS TO ISSUE PRECLUSION REQUIRING SHE BE PERMITTED TO INTERVENE WITHIN THESE PROCEEDINGS BEFORE THE S.C. COURT OF APPEALS. SHE CRAWFORD'S DECEASE CHILD'S GOD MOTHER AND AUNT, CRAWFORD'S SISTER-IN-LAW ESTABLISHING RIGHTS AS A DIRECT FAMILY MEMBER TO OBTAIN EVIDENCE INTO THE TRUE CAUSE OF DEATH OF CRAWFORD'S DECEASED CHILD ESTABLISHING HER ACQUIRED INTEREST AND RIGHT TO INTERVENE, ESPECIALLY SINCE SHE IS DIRECT PARTY IN THE CASE BEFORE THE KERSHAW COUNTY GENERAL SESSIONS COURT AND WAS NEVER GIVEN NOTICE OF THE HEARING PRODUCING UNCONSTITUTIONAL ACTION THAT VOIDS THE GENERAL SESSIONS COURT'S JURISDICTION. SHE NOW INTERVENES AS PARTY IN THIS APPEAL WITH RIGHT TO ACT PRO SE AND FILE BRIEF DUE TO THE FRAUD AND LACK OF NOTICE ON THE PART OF THE LOWER COURT. MANDAMUS IS NOW BEING SOUGHT WITHIN THE S.C. SUPREME COURT TO RELIEVE THIS COMPROMISED APPOINTED COUNSEL. THIS IS NOTICE. PURSUANT TO OPTERNATIVE, INC. v. SOUTH CAROLINA BOARD OF MEDICAL EXAMINERS (JANUARY 21, 2026)(THE S.C. SUPREME COURT REAFFIRMED THAT CONSTITUTIONAL DUE PROCESS UNDER ARTICLE 1, SECTION 3 REQUIRES PROPER NOTICE AND A MEANINGFUL OPPORTUNITY TO BE HEARD. THIS SUPPORTS THE ARGUMENT THAT AN ORDER ISSUED WITHOUT NOTICE TO AN ACTIVE PARTY IS PROCEDURALLY DEFECTIVE AND VOID.); McDANIELS v. U.S. FID. & GUAR. CO. (ESTABLISHED PRECEDENT)[THIS CASE REMAINS THE "GOLD STANDARD" FOR CHALLENGING ORDERS ISSUED WITHOUT NOTICE. IT HOLDS THAT A JUDGMENT IS VOID IF THE COURT FAILED TO PROVIDE NOTICE OF RECORD, AS THIS VIOLATES PROCEDURAL DUE PROCESS AND IS UNCONSTITUTIONAL]; CLIMER v. LOFTIS (NOVEMBER 12, 2025)(THE S.C. SUPREME COURT ALLOWED FOR INTERVENOR-RESPONDENTS SUCH AS THE SPEAKER OF THE HOUSE AND PRESIDENT OF THE SENATE TO PARTICIPATE IN THE APPEAL TO PROTECT THEIR INTEREST); STATE v. PHILLIPS (RECENT PRECEDENT)[THE COURT REMANDED THE CASE WHERE

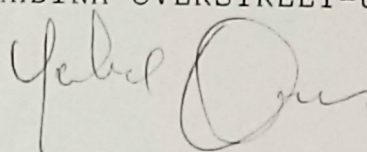
FORENSIC EVIDENCE PROCEDURES WERE NOT FOLLOWED CORRECTLY,
EMPHASIZING THAT THE "ON THE RECORD" EXERCISE OF DISCRETION IS
IMPOSSIBLE IF A PARTY IS NOT PRESENT TO RAISE OBJECTIONS].

RESPECTFULLY,

LAWRENCE L. CRAWFORD



YAHDIRA OVERSTREET-U-DEEN



JANUARY 28, 2026

RECEIVED

Jan 28 2026

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CASE DOCKET NO. _____

APPEAL FROM THE SOUTH CAROLINA COURT OF APPEALS
CASE DOCKET NO. 2025-001856

APPEALING FROM THE COUNTY OF KERSHAW
IN THE COURT OF GENERAL SESSIONS

APPLICATION FOR FORENSIC DNA TESTING
CASE NO. 2004-GS-28-00385

LAWRENCE L. CRAWFORD AKA JONAH GABRIEL JAHJAH T. TISHBITE,

APPELLANT(S)-PETITIONER(S)

YAHADINA OVERSTREET-U-DEEN,

INTERVENOR(S)-PETITIONER(S)

Vs.

THE STATE OF SOUTH CAROLINA, THE COUNTY OF KERSHAW,

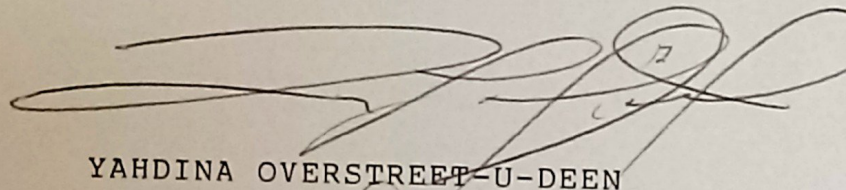
RESPONDENT(S)-APPELLEES

AFFIDAVIT OF SERVICE

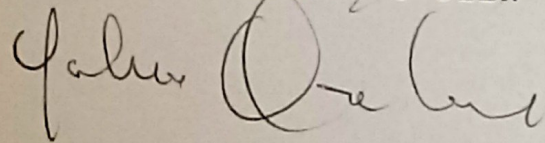
WE, LAWRENCE L. CRAWFORD AKA JONAH GABRIEL JAHJAH T. TISHBITE, YAHDINA OVERSTREET-U-DEEN, DO HEREBY CERTIFY, THAT WE HAVE MAILED AND OR SERVED A COPY OF A DOCUMENT ENTITLED, "SUMMONS AND AFFIDAVIT OF FACTS GIVING JUDICIAL NOTICE; PETITION TO INVOKE THE S.C. SUPREME COURT'S ORIGINAL JURISDICTION FOR PETITION SEEKING WRIT OF MANDAMUS TO COMPEL RULING; MOTION TO INTERVENE AND MOTION TO MOTION THEREFOR, ON CHIEF JUDGE BRUCE H. WILLIAMS AND THE S.C. COURT OF APPEALS P.O. BOX 11629 COLUMBIA, S.C. 29211, THE SOUTH CAROLINA COMMISSION OF INDIGENT DEFENSE 1330 LADY STREET, SUITE 401 COLUMBIA, S.C. 29201, THE S.C. ATTORNEY GENERAL P.O. BOX 11549 COLUN+MBIA, S.C. 29211 AND ALL INVOLVED PARTIES BY U.S. MAIL, POSTAGE PREPAID, BY DEPOSITING IT IN THE INSTITUTION MAILBOX AND OR ELECTRONICALLY, POSTAGE PREPAID ON JANUARY 28, 2026.

RESPECTFULLY,

LAWRENCE L. CRAWFORD



YAHDINA OVERSTREET-U-DEEN



JANUARY 28, 2026

IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CASE DOCKET NO. _____

APPEAL FROM THE SOUTH CAROLINA COURT OF APPEALS
CASE DOCKET NO. 2025-001856

APPEALING FROM THE COUNTY OF KERSHAW
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LAWRENCE L. CRAWFORD AKA JONAH GABRIEL JAHJAH T. TISHBITE,

APPELLANT(S)-PETITIONER(S)

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INTERVENOR(S)-PETITIONER(S)

Vs.

THE STATE OF SOUTH CAROLINA, THE COUNTY OF KERSHAW,

RESPONDENT(S)-APPELLEES

SUMMONS

TO: CHIEF JUDGE H. BRUCE WILLIAMS OF THE S.C. COURT OF APPEALS,

YOU ARE HEREBY SUMMONED AND REQUIRED, TO ANSWER, RESPOND AND BE IN COMPLIANCE TO THE COPY OF THIS PETITION FOR WRIT OF MANDAMUS, A COPY OF WHICH IS HEREBY SERVED UPON YOU VIA THE S.C. COURT OF APPEALS, AND SERVE PROOF OF YOUR RESPONSE AND COMPLIANCE ON THE S.C. SUPREME COURT AND THE PETITIONERS(S) SUBSCRIBED BELOW, WITHIN (20) DAYS OF RECEIPT OF THIS PLEADING, EXCLUSIVE OF THE DAY THAT IT WAS RECEIVED, OR DEFAULT SHALL BE RENDERED AGAINST YOU WITHIN THE COURT RECORD FOR THE RELIEF DEMANDED.

LAWRENCE L. CRAWFORD AKA
JONAH GABRIEL JAHJAH T. TISHBITE
#300839 F3B. RM. 148
EVANS C.I. 610 HWY. 9 WEST
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YAH DINA OVERSTREET-U-DEEN
15306 ROBEY AVENUE SUITE 707
HARVEY, ILLINOIS 60426

IN THE SOUTH CAROLINA SUPREME COURT
IN THE COUNTY OF RICHLAND

4-of-14

JANUARY 28, 2026

IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CASE DOCKET NO. _____

APPEAL FROM THE SOUTH CAROLINA COURT OF APPEALS
CASE DOCKET NO. 2025-001856

APPEALING FROM THE COUNTY OF KERSHAW
IN THE COURT OF GENERAL SESSIONS

APPLICATION FOR FORENSIC DNA TESTING
CASE NO. 2004-GS-28-00385

LAWRENCE L. CRAWFORD AKA JONAH GABRIEL JAHJAH T. TISHBITE,

APPELLANT(S)-PETITIONER(S)

YAHDIRA OVERSTREET-U-DEEN,

INTERVENOR(S)-PETITIONER(S)

Vs.

THE STATE OF SOUTH CAROLINA, THE COUNTY OF KERSHAW,

RESPONDENT(S)-APPELLEES

AFFIDAVIT OF FACTS GIVING JUDICIAL NOTICE; PETITION TO
INVOKE THE S.C. SUPREME COURT'S ORIGINAL JURISDICTION FOR
PETITION SEEKING WRIT OF MANDAMUS TO COMPEL RULING; MOTION

TO INTERVENE AND MOTION TO MOTION THEREFOR

TO: THE SOUTH CAROLINA SUPREME COURT,
THE S.C. COURT OF APPEALS,
THE S.C. OFFICE OF INDIGENT DEFENSE,
THE S.C. ATTORNEY GENERAL ET. AL.,

HERE THE S.C. SUPREME COURT AND PARTIES WILL FIND ATTACHED TO THIS PLEADING FOR ALL PURPOSES:

(1) A COPY OF AN AFFIDAVIT OF NON FRIVOLOUS FILING.

(2) A COPY OF A PDF FILE RECEIVED BY THE S.C. COURT OF APPEALS ON DECEMBER 23, 2025 REGARDING THE PENDING APPEAL UNDER CASE NO. 2025-001856.

(3) A COPY OF THE DOCUMENT ENTITLED, "AFFIDAVIT OF SERVICE AND AFFIDAVIT OF FACTS GIVING JUDICIAL NOTICE; MOTION TO REINSTATE THE APPEAL; MOTION TO STAY AND OR RECALL THE REMITTITUR IF NECESSARY; MOTION TO CHALLENGE THE S.C. COURT OF APPEALS JURISDICTION UNDER THE CONSTITUTIONAL ELEMENT TO SUBJECT MATTER JURISDICTION IN THEIR USE OF RULE 207 RELATED TO THE ORDERING OF THE TRIAL TRANSCRIPT AND MOTION TO MOTION THEREFOR", [10] PAGES DATED NOVEMBER 3, 2025 THAT IS FILED UNDER CASE 2025-001856 IN THE S.C. COURT OF APPEALS.

(4) A COPY OF THE "AFFIDAVIT OF SERVICE, SUMMONS AND PETITION FOR WRIT OF MANDAMUS; MOTION FOR ACCEPTANCE AND MOTION TO MOTION THEREFOR", [10] PAGES DATED NOVEMBER 3, 2025 THAT IS FILED UNDER CASE 2025-001856 IN THE S.C. COURT OF APPEALS.

(5) A COPY OF THE DOCUMENT ENTITLED, "AFFIDAVIT OF SERVICE AND AFFIDAVIT OF FACTS GIVING JUDICIAL NOTICE; MOTION TO FILE APPEAL IN FORMA PAUPERIS; MOTION TO SEEK AND ORDER THE RELEASE OF THE TRIAL TRANSCRIPTS IN FORMA PAUPERIS FOR PURPOSES OF APPEAL AND MOTION TO MOTION THEREFOR", [55] PAGES DATED OCTOBER 7, 2025 THAT IS FILED BEFORE THE KERSHAW COUNTY COURT OF GENERAL SESSIONS AND THE S.C. COURT OF APPEALS UNDER CASE 2025-001856.

INSOMUCH, THE PETITIONER(S) SEEK TO INVOKE THE SOUTH CAROLINA SUPREME COURT'S ORIGINAL JURISDICTION FOR THE PURPOSE OF SEEKING PETITION FOR WRIT OF MANDAMUS REGARDING THE MATTERS THAT CURRENTLY EXIST UNDER CASE 2025-001856 WITHIN THE SOUTH CAROLINA COURT OF APPEALS. THE MATTERS INVOLVE SPECIFIC PUBLIC INTEREST THAT REQUIRE IMMEDIATE RESOLUTION BY THE STATE'S HIGHEST COURT. THERE ARE "SPECIAL GROUNDS OF EMERGENCY" OR OTHER "GOOD REASONS" WHY THIS MATTER CANNOT WAIT FOR THE STANDARD PROCESS THAT CURRENTLY EXIST WITHIN THE S.C. COURT OF APPEALS. THE RESPONDENT (S.C. COURT OF APPEALS) HAVE [20] DAYS FROM THE FILING OF THIS PLEADING WITHIN THEIR COURT OR IN FUNDAMENTAL FAIRNESS TO THE PETITIONER(S) SHOULD IN FUNDAMENTAL FAIRNESS TO THE PETITIONER(S) BE SUBJECT TO DEFAULT, FORFEITURE AND WAIVER ON THE RELIEF DEMANDED. IF THE COURT DECLINES TO HEAR THE MATTER IN ITS ORIGINAL JURISDICTION, THE SEEKING OF MANDAMUS MUST BE SUFFICIENT IN ITS STANDARD FORM. PURSUANT TO RULES OF APPELLATE PROCEDURE, RULE 245. THE PETITIONERS SEEK TO INVOKE THE COURT'S JURISDICTION FOR THIS PURPOSE.

THE PETITIONER(S) SEEK THAT THE S.C. SUPREME COURT TAKE NOTICE OF THE ATTACHMENTS SUBMITTED WITH THIS FILING. THE [55] PAGE DOCUMENT GIVES A HISTORY OF THE MATTERS BEFORE US. THE EGREGIOUS AMOUNT OF DUE PROCESS VIOLATION, CONSPIRING UNDER COLOR OF STATE LAW BY THE PARTIES, AND OTHER MATTERS ARGUED WITHIN THE ATTACHMENTS AND ON APPEAL SUBMIT MORE THAN SUFFICIENT CAUSE FOR THE S.C. SUPREME COURT TO INTERVENE WHERE THIS MATTER CANNOT BE PROPERLY ADDRESSED THROUGH THE NORMAL CURRENT APPELLATE PROCESS. AFTER THIS CASE HAS SAT IN LIMBO WITHIN THE KERSHAW COUNTY COURT OF GENERAL SESSIONS FOR OVER 4 YEARS IN VIOLATION OF U.S. SUPREME

COURT RULING UNDER BETTERMAN v. MONTANA 2016, ALSO IN VIOLATION OF THE CLAIM PROCESSING RULE(S) THAT WERE TIMELY SOUGHT EXERCISED AND INVOKED WITHIN THE KERSHAW COUNTY COURT OF GENERAL SESSIONS. ONCE THE CASE WAS PLACED BEFORE THE SOUTH CAROLINA COURT OF APPEALS. THE S.C. COURT OF APPEALS PLACED LEGAL COUNSEL IN THE FORM OF THE S.C. APPELLATE DEFENSE OFFICE ON THE APPELLANT WHERE THERE IS A CLEAR AND OBVIOUS CONFLICT OF INTEREST THAT EXIST BY THESE INDIVIDUALS REPRESENTING THE APPELLANT DUE TO RICHLAND COUNTY AND ITS OFFICIALS BEING DIRECT DEFENDANTS IN PENDING LITIGATION WITHIN THE FEDERAL DISTRICT COURT. THE PETITIONER, YAHDINA OVERSTREET-U-DEEN MOTIONS TO INTERVENE IN THIS PETITION SINCE SHE WAS A PARTY TO THESE PROCEEDINGS WHEN THEY WERE PREVIOUSLY FILED BEFORE THE SOUTH CAROLINA SUPREME COURT TO ADDRESS THE INORDINATE DELAY THAT PERSISTED WITHIN THE KERSHAW COUNTY COURT OF GENERAL SESSIONS AS A DIRECT FAMILY MEMBER, AND WHERE THIS ADDITIONAL DELAY HAS NOW CROPPED UP BEFORE THE S.C. COURT OF APPEALS REGARDING THE OBTAINING OF THE FORENSIC DNA TESTING AND EVIDENCE OF ACTUAL INNOCENCE. THERE IS CLEAR UNCERTAINTY AS TO THE APPELLANT, CRAWFORD'S, STATUS BEFORE THE S.C. COURT OF APPEALS THAT DEFY "JUSTICE AND FAIRNESS." IS THE APPELLANT PRO SE? IS THE SOUTH CAROLINA APPELLATE DEFENSE OFFICE TO CONTINUE TO REPRESENT THE APPELLANT WHERE THERE IS A CLEAR CONFLICT OF INTEREST? ARE THE TRIAL TRANSCRIPTS TO BE RELEASED BY INDIGENCE TO ALLOW THE PROCEEDINGS TO MOVE FORWARD IN A JUST AND EXPEDIENT MANNER? IS THE APPELLANT, CRAWFORD, PERMITTED TO ARGUE AGAINST THE PRECEDENT ESTABLISHED BY THE STATE v. GENTRY CASE OF 2005 REGARDING THE CONCEPTS OF SUBJECT MATTER JURISDICTION? THE S.C. COURT OF APPEALS INACTION IN RULING ON THE MOTION HAS CREATED CLEAR UNCONSTITUTIONAL UNCERTAINTY THAT MUST BE REMEDIED FORTHWITH IN ORDER THAT THE APPELLANT, CRAWFORD, WOULD KNOW HIS TRUE STATUS IN WHICH HE IS TO PROCEED BEFORE THIS COURT, WHICH IS COMPOUNDED BY MOTION TO EXPEDITE THESE MATTERS WITHIN THE S.C. COURT OF APPEALS DUE TO THE UNCONSTITUTIONAL INORDINATE DELAY AND FRAUD UPON THE COURT THAT HAS OCCURRED WITHIN THE KERSHAW COUNTY COURT OF GENERAL SESSIONS AS IS HIGHLIGHTED WITHIN THE [55] PAGE ATTACHED APPENDIX AND OR EXHIBIT.

IN SOUTH CAROLINA A CONFLICT OF INTEREST EXISTS IF THERE

IS A SIGNIFICANT RISK THAT LAWYER'S REPRESENTATION OF A CLIENT WILL BE MATERIALLY LIMITED BY THE LAWYER'S OWN PERSONAL INTEREST. CONFLICT OF INTEREST UNDER RULE 1.7 OF THE SOUTH CAROLINA RULES OF PROFESSIONAL CONDUCT, A "CONCURRENT CONFLICT OF INTEREST" EXISTS IF: THERE IS A SIGNIFICANT RISK THAT THE REPRESENTATION WILL BE MATERIALLY LIMITED BY THE LAWYER'S RESPONSIBILITIES TO ANOTHER CLIENT, A FORMER CLIENT, OR BY A PERSONAL INTEREST OF THE LAWYER. PENDING LITIGATION AGAINST THE COUNTY OF RICHLAND, THE RICHLAND, KERSHAW ETC. COUNTIES SHERIFF OFFICE(S) AND APPELLATE DEFENSE OFFICE AS IT RELATES TO THE CONSPIRACY TO FRAME THE APPELLANT BEHIND RELIGIOUS AND RACIAL HATRED AND FAILING TO PROSECUTE MICHAEL LEE FOR WELL OVER [24] COUNTS OF CRIMINAL SEXUAL CONDUCT AGAINST THE APPELLANT'S MINOR CHILD FOR WHICH THERE IS NO STATUTE OF LIMITATIONS OR "ROMEO AND JULIET" LAWS IN SOUTH CAROLINA. SUCH A FEDERAL LAWSUIT PENDING AGAINST THE STATE AND COUNTIES ACTORS PENDING WITHIN THE FEDERAL COURT ALLEGING PAST CONSPIRACY AND HARM GENERALLY CREATES SUCH A PERSONAL INTEREST CONFLICT, AS THE APPELLATE DEFENSE OFFICE MAY BE MORE CONCERNED WITH THEIR OWN LEGAL DEFENSE THAN THE APPELLANT, CRAWFORD'S, INTEREST FOR THEIR PART IN THE CONSPIRING UNDER COLOR OF STATE LAW IN THE CLAIMS PENDING WITHIN THE FEDERAL DISTRICT COURT. WHERE THE S.C. COURT OF APPEALS CURRENTLY REFUSES TO REMOVE THIS COMPROMISED COUNSEL IN THE FORM OF THE APPELLATE DEFENSE OFFICE AND ITS EMPLOYEES, LEAVING THE APPELLANT'S LEGAL STATUS IN LIMBO BY THIS UNCONSTITUTIONAL ACTION AND CLEAR CONFLICT OF INTEREST, THE APPELLANT(S) CAN PETITION THE S.C. SUPREME COURT FOR MANDAMUS. THE MANDAMUS IS A "COERCIVE WRIT" UTILIZED TO ORDER A PUBLIC OFFICIAL TO PERFORM A MINISTERIAL DUTY SUCH AS RULE ON THE MOTION TO RELIEVE THE COMPROMISED LEGAL COUNSEL AND ORDER THE TRIAL TRANSCRIPTS IN FORMA PAUPERIS TO ALLOW THE APPEAL WITHIN THE S.C. COURT OF APPEALS TO PROCEED IN AN ORDERLY FASHION, WHERE IN THIS CASE THERE IS NO OTHER REMEDY AVAILABLE.

THE APPELLANT, CRAWFORD, HAS A SPECIFIC LEGAL RIGHT TO THE ACT REQUESTED, THAT BEING TO OBTAIN THE TRIAL TRANSCRIPTS AND PROCEED WITH CONFLICT FREE COUNSEL, ACT PRO SE TO REMEDY THIS AND PREVENT THE ACTS OF CONSPIRING UNDER COLOR OF STATE LAW TO SILENCE THE APPELLANT, CRAWFORD, AND PREVENT THE ARGUING AGAINST

THE PRECEDENT ESTABLISHED BY THE STATE v. GENTRY CASE OF 2005 REGARDING SUBJECT MATTER JURISDICTION WHICH CANNOT BE WAIVED AND OR FORFEITED AND CAN BE RAISED AT ANY TIME, EVEN ON APPEAL, EVEN AFTER A FINAL JUDGMENT HAS BEEN ISSUED IN THE CASE PURSUANT TO RULES OF APPELLATE PROCEDURE, RULE 217. IT IS A MANDATORY DUTY OF THE COURT TO RULE ON THE MOTION TO FREE THE APPELLANT OF THE COMPROMISED STATE APPOINTED COUNSEL AND HAVE THE TRANSCRIPTS IMMEDIATELY ORDERED TO ALLOW THE APPELLANT TO PERFECT THE APPEAL. MINISTERIAL DUTY TO ACT: ALTHOUGH THE CONTENT OF A JUDGE'S RULING IS DISCRETIONARY, THE ACT OF RENDERING A DECISION ON A PROPERLY FILED MOTION IS CONSIDERED A MINISTERIAL DUTY. DUE TO THE APPELLANT, CRAWFORD'S STATUS BEING SUBJECT TO UNCERTAINTY AND UNJUSTLY KEPT IN LIMBO AFTER AN UNCONSTITUTIONAL DELAY BEFORE THE KERSHAW COUNTY COURT OF GENERAL SESSIONS, THIS ADDITIONAL UNNECESSARY DELAY AND OR INACTION BECOMES "UNREASONABLE" WHERE THE S.C. COURT OF APPEALS HAS EFFECTIVELY REFUSED TO PERFORM ITS MINISTERIAL DUTY BY FAILING TO IMMEDIATELY ACT LEAVING THE APPELLANT'S DUE PROCESS MATTERS IN UNCERTAINTY. BY THE CURRENT SITUATION THERE IS NO OTHER ADEQUATE LEGAL REMEDY AVAILABLE TO FORCE THE S.C. COURT OF APPEALS TO ACT. DUE TO THE APPELLANT'S LEGAL STATUS BEING UNCERTAIN AND IN LIMBO, THIS CREATES SPECIAL GROUNDS OF EMERGENCY AND "MATERIAL PREJUDICE" THAT IS CAUSED BY THE DELAY AND OR INACTION IN RULING. BY THE ATTACHED DOCUMENTS IT IS CLEAR THAT THE APPELLANT, CRAWFORD, HAS MADE EVERY ATTEMPT TO RESOLVE THE DELAY AND OR INACTION EXHAUSTING ALL OTHER REMEDIES. IN SOUTH CAROLINA, A WRIT OF MANDAMUS IS THE ESTABLISHED MECHANISM TO COMPEL A COURT TO PERFORM A "MINISTERIAL DUTY," WHICH INCLUDE THE DUTY TO RULE ON THE MOTION TO RELIEVE COUNSEL AND OTHER MOTIONS DUE TO CLEAR CONFLICT OF INTEREST AND ORDER THE RELEASE OF THE TRIAL TRANSCRIPTS TO ALLOW THE APPEAL BEFORE THE S.C. COURT OF APPEALS TO PROCEED IN AN ORDERLY AND EXPEDIENT FASHION AS DUE PROCESS LAW REQUIRES.

RECENT SOUTH CAROLINA CASES THAT ESTABLISH PRECEDENT FOR THIS ACTION ARE: STATE v. GRIDINE, S.E.Rptr., 2025 WL 48202 (S.C.2025)(WHILE SPECIFIC TO APPELLATE REVIEW, THIS CASE REINFORCES THE SUPREME COURT'S ACTIVE ROLE IN OVERSEEING LOWER COURT PROCEDURAL ADHERENCE AND ENSURING THAT MANDATORY LEGAL

DUTIES ARE FULFILLED.); SPRING VALLEY INTERESTS, LLC. v. THE BEST FOR LAST, LLC., --S.E.2d.--, 2026 WL 45017 (S.C.App.2026)(IN THIS VERY RECENT SUPREME COURT RULING, THE SUPREME COURT REVERSED THE COURT OF APPEALS DECISION HIGHLIGHTING ITS AUTHORITY TO INTERVENE WHEN A LOWER COURT FAILS TO CORRECTLY APPLY MANDATORY STATUTORY OR COMMON LAW RULES.); BROOKS v. SOUTH CAROLINA COMMISSION OF INDIGENT DEFENSES, 419 S.C. 319, 797 S.E.2d. 402 (S.C.App.2017)(DEMONSTRATING BY SUPREME COURT RULING THE REQUIREMENT TO RELIEVE STATE APPOINTED COUNSEL UNDER CERTAIN CIRCUMSTANCES.) ALSO SEE EX PARTE SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE, S.E.Rptr., 2025 WL 3230720 (S.C.App.2025)(LIKE BROOKS THIS CASE INVOLVES THE COMMISSION ON INDIGENT DEFENSE [WHICH OVERSEES APPELLATE DEFENSE] AND THE SUPREME COURT'S AUTHORITY TO REVIEW THE APPOINTMENT AND CONDUCT OF INDIGENT DEFENSE COUNSEL.); SANFORD v. SOUTH CAROLINA STATE ETHICS COMM'N., 385 S.C. 483, 685 S.E.2d. 600 (S.C.App.2009)(A FOUNDATIONAL PRECEDENT ESTABLISHING THAT THE SUPREME COURT CAN ISSUE WRIT OF MANDAMUS TO ENFORCE A "CLEAR RIGHT" SUCH AS TO HAVE CONFLICT FREE COUNSEL AND TRIAL TRANSCRIPTS FOR APPEAL PURPOSES, WHEN A PUBLIC OFFICIAL FAILS TO PERFORM A MANDATORY DUTY SUCH AS RULE ON THE MOTION(S) PRESENTED.); STATE v. EASTWOOD (2025), COMPANION TO THE COMMISSION CASE, THIS REINFORCES THE COURT'S JURISDICTION OVER DEFENSE COUNSEL'S CONFLICTS AND THE NECESSITY OF INDEPENDENT, UNCOMPROMISED REPRESENTATION.); STANKO v. STRILING, 109 F.4TH. 681 (4th.Cir.2024)(THE 4th. CIRCUIT DETERMINED THAT AN APPELLANT UNDER THESE CIRCUMSTANCES HAS A DUE PROCESS RIGHT TO CONFLICT FREE COUNSEL.); UNITED STATES v. PERRY, 92 F.4TH. 500 (4th.Cir.2024)(THE 4th. CIRCUIT DETERMINED THAT A CONFLICT OF INTEREST CAN SUPPORT A CLAIM OF INEFFECTIVE ASSISTANCE OF COUNSEL UNDER THESE CIRCUMSTANCES.); UNITED STATES v. GLOVER, 8 F.4TH. 239 (4th.Cir.2021)(COUNSEL'S UNDIVIDED LOYALTY MUST LIE WITH HIS CLIENT, NOT THE STATE AND OR COUNTY WHO EMPLOYS HIM WHERE THEIR PARTICIPATION IN THE CONSPIRACY IS CURRENTLY UNDER REVIEW AND PENDING WITHIN THE FEDERAL DISTRICT COURT.); PLUM CREEK DEVELOPMENT CO. INC. v. CITY OF CONWAY, 334 S.C. 30, 512 S.E.2d. 106 (S.C.App.1999); WILSON v. PRESTON, 378 S.C. 347, 662 S.E.2d. 589 (S.C.App.2008)(THESE CASES ARE CITED IN 2024 AND 2025 FILINGS TO DEFINE A "MINISTERIAL ACT" AS ONE WHERE

THE LAW IS SO PRECISE IT LEAVES "NOTHING TO THE EXERCISE OF DISCRETION." FILING A RULING ON A MOTION--REGARDLESS OF THE OUTCOME--IS CONSIDERED SUCH A MINISTERIAL ACT. MINISTERIAL DUTY TO RULE: UNDER RULE 245, SCACR, THE SUPREME COURT MAY EXERCISE ORIGINAL JURISDICTION TO ISSUE WRIT WHEN THE LOWER COURT DELAY OR FAIL TO RULE, AS THE ACT OF RULING ITSELF IS MANDATORY. MANDATORY REMOVAL FOR CONFLICT: UNDER RULE 1.7 OF THE RPC, IF A "PERSONAL INTEREST" CONFLICT (SUCH AS PENDING LAWSUIT AGAINST THE LAWYER AND ITS ENTITY) MATERIALLY LIMITS THE REPRESENTATION, THE COURT HAS A MANDATORY DUTY TO ADDRESS IT. MANDAMUS IS APPROPRIATE HERE BECAUSE THERE IS OFTEN NO "ADEQUATE LEGAL REMEDY" TO FORCE A COURT TO ACT WHEN IT SIMPLY REMAINS SILENT ON A MOTION, ESPECIALLY ONE FILED TO RELIEVE COMPROMISED STATE APPOINTED LEGAL COUNSEL, IN RE: LEWIS S. MOORE, 446 S.C. 115, 919 S.E.2d. 391 (S.C.App.2025)(ALTHOUGH A DISCIPLINARY MATTER, THIS CASE REINFORCES THAT WHEN A LAWYER'S PERSONAL INTERESTS OR MISCONDUCT CREATE A RISK THAT REPRESENTATION WILL BE "MATERIALLY LIMITED," THE ATTORNEY MUST BE REMOVED FROM PRACTICE OR SPECIFIC CASES TO PROTECT THE INTEGRITY OF THE JUDICIAL PROCESS.).

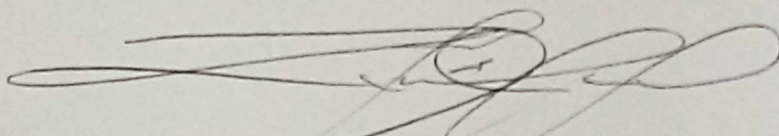
STATE APPOINTED LEGAL COUNSEL, SUCH AS PUBLIC DEFENDERS OR THE S.C. OFFICE ON INDIGENT DEFENSE CAN BE SUED UNDER 42 U.S.C. § 1983 FOR CONSPIRING WITH THE PROSECUTOR TO VIOLATE A PERSON'S CONSTITUTIONAL RIGHTS, DESPITE NORMALLY HAVING IMMUNITY FOR THEIR ROLE IN A DEFENSE. WHILE PUBLIC DEFENDERS TYPICALLY DO NOT ACT "UNDER COLOR OF STATE LAW" WHEN PERFORMING TRADITIONAL DEFENSE FUNCTIONS AN EXCEPTION EXISTS IF THEY CONSPIRE WITH STATE OFFICIALS (LIKE THE PROSECUTOR OR SOLICITOR'S OFFICE) TO ENGAGE IN FRAUDULENT OR UNLAWFUL BEHAVIOR SUCH AS SUPPRESSING EVIDENCE OF ACTUAL INNOCENCE LIKE THAT DNA AND SLED INVESTIGATIVE FILE SOUGHT 5501014 IN THE POSSESSION OF SLED. THE U.S. SUPREME COURT HAS ESTABLISHED THAT A PRIVATE PERSON OR PUBLIC DEFENDERS WHO CONSPIRE WITH STATE OFFICIALS TO DEPRIVE ANOTHER OF FEDERAL RIGHTS IS ACTING "UNDER COLOR OF STATE LAW". THE 4TH. CIRCUIT REQUIRES THAT ALLEGATIONS OF CONSPIRACY BE MORE THAN JUST CONCLUSORY, THEY CONSPIRED WITH THE STATE TO SUPPRESS EVIDENCE OF ACTUAL INNOCENCE IN THE FORM OF THE SLED INVESTIGATIVE FILE WHICH

COULD HAVE BEEN OBTAINED ON APPEAL WHERE IT WAS SOUGHT AT TRIAL. THEY SUPPRESSED DNA TESTING AND AIDED IN OVER 24 COUNTS OF CSC WITH A MINOR WHERE MICHAEL LEE UNTIL THIS DAY HAS FAILED TO BE PROSECUTED AS A BRIBE AND OR FEE TO AID IN GIVING PERJURED TESTIMONY AND ON APPEAL THEY AIDED IN COVERING ALL OF THIS UP WHERE THESE MATTERS ARE CLEARLY ESTABLISHED IN THE COURT RECORD. 42 U.S.C. § 1983 SPECIFICALLY TARGETS CONSPIRACIES AIMED AT DEPRIVING PERSONS OF RIGHTS BASED ON CLASS-BASED ANIMUS, SUCH AS RACIAL OR RELIGIOUS HATRED. SUCH CONDUCT IS ACTIONABLE IF THE ATTORNEY KNOWINGLY PRESENTS FALSE EVIDENCE OR COLLUDES WITH THE PROSECUTION TO DECEIVE THE COURT. PUBLIC DEFENDERS ARE NOT IMMUNE FROM § 1983 LIABILITY WHEN THEY CONSPIRE WITH STATE OFFICIALS. PRIVATE PARTIES (LIKE ATTORNEYS) WHO CONSPIRE WITH A JUDGE OR PROSECUTOR ARE ACTING UNDER COLOR OF LAW. IF THE APPELLANT CAN SHOW THE "MEETING OF THE MINDS" BETWEEN DEFENSE ATTORNEY AND A PROSECUTOR OR INTENTIONAL VIOLATION OF RIGHTS, SUCH AS CONCEALING EVIDENCE (SLED INVESTIGATIVE FILE AND DNA), THE IMMUNITY SHIELD IS PIERCED, TOWER v. GLOVER, 467 U.S. 914 (U.S.1984); DENNIS v. SPARKS, 449 U.S. 24 (U.S.1980); STINNIE v. HOLCOMB, 77 F.4TH. 200 (4th.Cir.2023); UNITED STATES v. RAVENELL, 66 F.4TH. 472 (4th.Cir.2023).

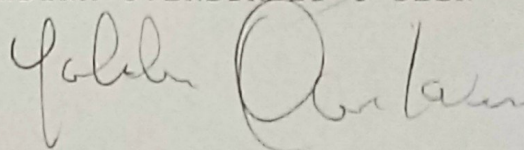
TO OBTAIN A PETITION FOR WRIT OF MANDAMUS REQUIRING THE PERFORMANCE OF AN ACT, THE PETITIONER(S) MUST SHOW: (1) A DUTY TO PERFORM THE ACT; (2) THE MINISTERIAL NATURE OF THE ACT; (3) THE PETITIONER(S) SPECIFIC LEGAL RIGHT FOR WHICH DISCHARGE OF THE DUTY IS NECESSARY; AND (4) A LACK OF ANY OTHER LEGAL REMEDY. A MANDAMUS IS BASED ON THE THEORY THAT AN OFFICER CHARGED WITH A PURELY MINISTERIAL DUTY TO PERFORM (RULE ON THE MOTION TO RELIEVE THE COMPROMISED LEGAL COUNSEL DUE TO CONFLICT OF INTEREST AND ORDER THE RELEASE OF THE TRIAL TRANSCRIPTS IN FORMA PAUPERIS DUE TO INDIGENCE) CAN BE COMPELLED TO PERFORM THAT DUTY IN CASE OF REFUSAL, INACTION OR DELAY. BY THE AFOREMENTIONED THE S.C. SUPREME COURT SHOULD ENTERTAIN JURISDICTION TO GRANT THE PETITION FOR WRIT OF MANDAMUS TO ENSURE THE MINISTERIAL DUTY IS IMMEDIATELY PERFORMED, GRAY MEDIA GROUP, INC. v. LOVERIDGE, 2025 WL 2679331 (4th.Cir.2025); MORENO v. BOSHOLM, 151 F.4TH. 543

(4th.Cir.2025); STRICKLAND v. RICHLAND COUNTY LEGISLATIVE DELEGATION, 440 S.C. 438, 892 S.E.2d. 288 (S.C.App.2023); CAROLINA CENTER BUILDING CORP. v. ENMARK STATIONS, INC., 433 S.C. 144, 857 S.E.2d. 16 (S.C.App.2021). THE PETITIONER(S) DO HEREBY CERTIFY, DECLARE, AFFIRM UNDER PENALTY OF PERJURY THAT THE AFOREGOING IS TRUE AND CORRECT AND THE PETITIONER(S) HAVING PERSONAL KNOWLEDGE OF THE FACT ARE OF SOUND MIND AND COMPETENT TO TESTIFY AS TO THE VERITY OF THE CLAIMS PRESENTED.

RESPECTFULLY,
JONAH THE TISHBITE



YAHDINA OVERSTREET-U-DEEN



JANUARY 28, 2026