

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Case No. 2024-000049

Dallan Timothy Thorstenson,

Appellant,

v.

State of South Carolina,

Respondent.

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MAR 06 2026
SC Court of Appeals

MOTION FOR SUBSTITUTION OF COUNSEL

NOW COMES the Appellant, Dallan Timothy Thorstenson, and respectfully moves this Court for substitution of appellate counsel in the above-entitled matter. In support thereof, Appellant states as follows:

1. Appointed counsel Joanna K. Delany has unequivocally refused and failed to file critical motions related to the reconstruction hearing scheduled for September 30, 2025, which is essential for protecting Appellant's appellate rights.
2. This refusal constitutes ineffective assistance of counsel and a blatant dereliction of professional duty.
3. Appellant has documented and will pursue criminal charges against counsel, judicial, and prosecutorial actors involved in an ongoing conspiracy and obstruction of justice deliberately designed to subvert Appellant's constitutional rights.
4. This conspiracy and obstruction have materially prejudiced the integrity of this proceeding and Appellant's rights to a fair appeal.
5. Given the irreconcilable breakdown of the attorney-client relationship and counsel's complicity in obstruction, Appellant respectfully requests this Court immediately substitute counsel and order the South Carolina Commission on Indigent Defense (SCCID) to assign competent replacement counsel.
6. Alternatively, Appellant requests leave to proceed pro se pending appointment of new counsel.

WHEREFORE, Appellant prays that this Court:

- a. Substitute appellate counsel and direct SCCID to promptly assign replacement counsel;
- b. Alternatively, grant leave for Appellant to proceed pro se until substitute counsel is appointed;
- c. Grant all other relief deemed just and proper.

Respectfully submitted this 13th day of September, 2025.

Dallan Timothy Thorstenson
DOC No. 392694
200 Prison Rd
Enoree, South Carolina 29335
Appellant



SEP 22 2025

MAR 2 2026



Notary 

ETP

4/14/24



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NOTICE OF INTENT TO SUBSTITUTE COUNSEL

Comes now the Appellant, Dallan Timothy Thorstenson, and hereby notifies the Court and the South Carolina Commission on Indigent Defense (SCCID) of his intent to substitute appellate counsel in the above-captioned matter.

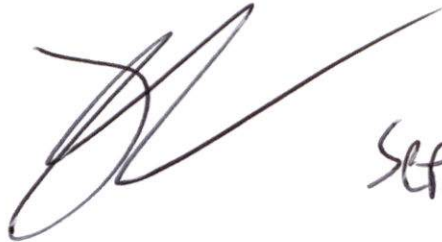
This notice is based on the documented refusal of appointed counsel Joanna K. Delany to file prerequisite motions related to the September 30, 2025 reconstruction hearing, which is critical to the protection of Appellant's rights.

Further, Appellant asserts that counsel's ongoing involvement and the conduct of certain judiciary and prosecutorial actors constitute a criminal conspiracy and obstruction of justice directly impacting this case, for which Appellant intends to pursue criminal charges.


Due to counsel's failure to act and this broader obstruction, Appellant respectfully requests immediate appointment of substitute counsel, or in the alternative leave to proceed pro se pending assignment of competent replacement counsel, to preserve Appellant's constitutional right to effective assistance of counsel.

Respectfully submitted this 13th day of September, 2025.

Dallan Timothy Thorstenson
DOC No. 392694
200 Prison Rd
Enoree, South Carolina 29335
Appellant

 Sep 22 2025

Mar 2 2026 

Notary  3/2/24

EXP  4/14/24



Dallan Timothy Thorstenson
DOC No. 392694
200 Prison Rd
Enoree, South Carolina 29335
Date: September 12, 2025

To:
The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

And To:
South Carolina Commission on Indigent Defense (SCCID)
1330 Lady Street, Suite 401
Columbia, South Carolina 29201

Re: State v. Dallan Timothy Thorstenson
Appellate Case No. 2024-000049

Dear Ms. Kitchings and SCCID,

I write to formally notify you that my appointed appellate attorney, Joanna K. Delany, has refused to oppose or file motions regarding my case, including opposition to the unlawful record reconstruction hearing scheduled for September 30, 2025. Despite repeated requests, Ms. Delany has not acted to safeguard my rights and has engaged in unacceptable conduct I have separately documented.

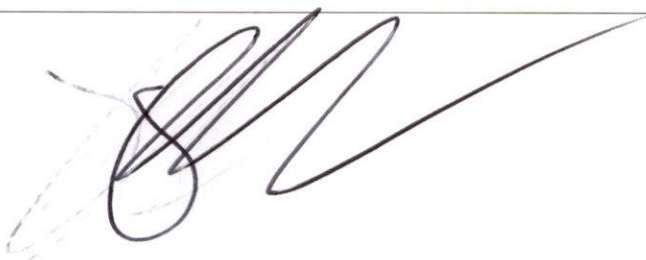
Therefore, I respectfully request that the Court intervene to:

1. Permit me to substitute new counsel or proceed pro se until adequate representation is provided;
2. Direct SCCID to immediately file all extraordinary circumstances motions on my behalf;
3. And grant any other relief necessary to prevent irreparable constitutional harm.

Thank you for your immediate attention to this critical matter affecting my constitutional protections.

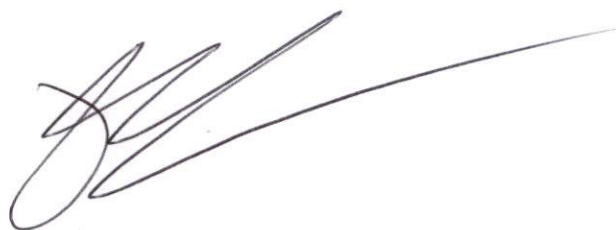
Respectfully,

Dallan Timothy Thorstenson
DOC No. 392694



22 SEP 2025

Mar 2 2026



Notary

DTS 3/2/26

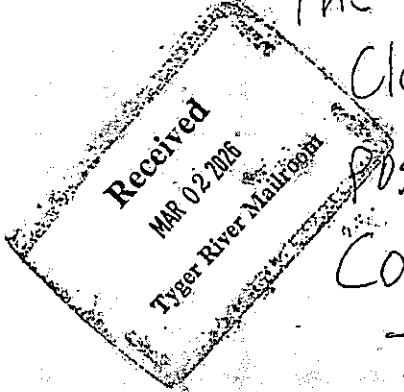
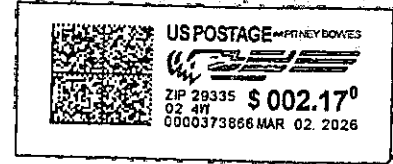
Exp

4/14/26



Dallan Thorstenson 292694
200 Prison Rd
Enoree, SC
29335

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The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post office Box 11629
Columbia, SC
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