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JAN 27 2014

IN The South Carolina Supreme Court
P.C. Supreme Court

Dekella Rene Brown 310705

2013-CP-4602011

-VS-

Motion For A Belated

The State of South Carolina Appeal, Pursuant to

S.C.A.C.R. Rule 203,

S.C.A.C.R. Rule 227

The (Appellant) files this motion for a belated appeal, base on the following facts.

- 1) P.C.R. Counsel, failed to served the (Appellant) a copy of the final order of Dismissal and failed to file a notice of Intent to appeal.
- 2) The (Appellant) wrote the court on January 9th, 2013. The clerk of court sent her a copy of the order to Dismissal.

The (Appellant's) claim was Dismissal on December 10th 2013, (Appellant) was never notified of the dismissed...

personally appeared

His 22nd day of January, 2014

Virgie R. Padgett Notary for SC.

My Commission expires - August 25, 2015

Respectfully,

Dekella Brown 310705

January 27th 2014

In The South Carolina Supreme Court

Antella Rena Brown 310705

2013-CP-4602211

-VS-

Notice of Intent to Appeal

The State of South Carolina

Pursuant to S.C.A.C.R. 203

Exhibit A

The (Appellant) files this notice and motion to appeal final order of Dismissal of her P.C.R. Claim.

Appealing from York County Court of Common Pleas, Circuit Court Judge, The Honorable (John C. Hayes III) on December 11th 2013

Pursuant to S.C.A.C.R. Rules ~~203~~⁴⁰ 203

Antella Brown 310705
January 22nd 2014

personally appeared this
22nd of January, 2014

Vickie R. Padgett - notary for SC.

my commission expires: August 25, 2015

In The South Carolina Supreme Court

Antella Rena Brown 310705

2013-CP-4602211

-VS-

The State of South Carolina

Motion to Alter the
Judgement under Federal
R.C.P. Rule 59©

EXHIBIT B

The (Appellant) files this motion to Alter the order of judgement Issued by P.C.R. Judge the Honorable John C Hayes. The Judgement is in violation of a state and Federal Statute, which is consistant with the 14th Amendment, U.S.C.A. The Judgement has deprived the (Appellant) of due Process of Law, guaranteed to her by U.S. Constitution which cannot be denied to her. The (Appellant) was deprived of fundamental fairness by the court Judgement enter against (Appellant) was based on Atty and prosecution misconduct, and hearsay evidence

Antella Brown 310705

January 22nd 2014

personally appeared

This 22nd of January, 2014

Uriebe R. Padgett - Notary for S.C.

my commission expires - August 25, 2015

In The South Carolina Supreme Court

Akella Rene Brown 310705

2013-CP-4602211

-V3-

Exhibit C

The State of South Carolina

Procedural History:

The (Appellant) plead guilty in the York County General Session Court. The (Appellant) appeared before the Honorable (John C Hayes III) the (Appellant) was represented by (Dan Hall) appellant, plead guilty to (Forgery) and was sentenced to (7) yrs for the charges all sentences were to run concurrent. Counsel, did not file an appeal. (Appellant) filed a P.C.R. Claim on July 23rd 2013, Counsel was appointed to Appellant on September 23rd 2013, Appellant hearing was set for December 9th 2013. Counsel failed to provide and authentic representation and also failed to ask for the discovery evidence to prepare for the (Appellant) defense... (Appellant's) guilty plea Counsel (Dan Hall) was present and he testified as the evidence that was relied upon, yet (Trial counsel (Henlepp)) failed to provide facts finding evidence to prove that the (Appellant) had actually committed the crime, in addition with counsel failure to produce a copy of the original guilty plea contract (Appellant) testified against herself, on advice of P.C.R. Counsel (Henlepp) who encourage the (Appellant) to be a witness

Continue --- exhibit C

Against herself and to incriminate ~~her~~ ⁽²⁰⁾ herself
In theory of the state's (USA) of heresy evidence
to entrap her, again on her P.C.R. claim. The
state (offers) no (physical) or scientific evidence
against the (appellant). The Appellant was convicted
on Heresy evidence and tainted evidence. P.C.R.
Trial Judge (Hayes) Denied (Appellant's) claim in
violation of the 14th Amendment U.S.C.A. Due
Process of Law guaranteed to her by the U.S.C.A.

Whella Brown 3/0705
January 22nd 2014

personally appeared

this 22nd day of January, 2014

Vicki R. Padgett, notary for S.C.

my commission expires August 25, 2015

In the South Carolina Supreme Court

Arkella Rene Brown 310705

2013-CP-4602211

-VS-

Exhibit 1)

The State of South Carolina

Statement of Facts.

1. P.C.R. Trial Counsel, failed to call witnesses
2. P.C.R. Counsel, failed to produce the state's evidence which was used to entrap the (appellant)
3. P.C.R. Counsel, failed to provide (appellant) with the discovery evidence of her case.
4. P.C.R. Counsel, failed to file a motion to suppress the alleged evidence of video tape which does not show the date, or time in which the video was allegedly taken.
5. P.C.R. Counsel, failed to obtain expert of microspecie to give illustration as to how old the film was, and who developed the alleged video.
6. P.C.R. Counsel failed to present a photocopy of guilty plea contract which he signed by counsel, solicitor, and appellant as burden of proof that the guilty was a negotiated plea agreement among all parties.
7. P.C.R. Counsel, stated (appellant) claim was without merit and failed to present and arguable claim and/or failed to perfect her P.C.R. claim

Continue Exhibit D. . .

8. P.C.R. Counsel, failed to file an appeal for the order of dismissal of the (Appellants) P.C.R. Claim
9. P.C.R. Counsel, deprived the (Appellant) of a Direct appeal of her P.C.R. Claim

In the South Carolina Supreme Court.

Akella Rene Brown 3/0705

2013-CP-4602211

-VS-

EXHIBIT E

The State of South Carolina

ISSUE Raise for Review S.C.A.C.R. 221
6th Amendment U.S.C.A. Ineffective Assistance
of P.C.R. Counsel.

Argument.

1. ~~Whether~~ Whether P.C.R. Counsel Prejudice the (Appellant's) P.C.R. Claim, when he failed to obtain an expert witness to give testimony as to when the video was taken of the (Appellant)
2. Whether P.C.R. Counsel, deprived (Appellant) of due process of law, when (Counsel) failed to obtain discovery evidence which was used to entrap her to enter a plea of guilty.
3. Whether P.C.R. Counsel erred when he failed to submit a motion to re-open the state's evidence
4. Whether P.C.R. Counsel, failed to suppress the alleged video evidence, because the State failed to produce the (evidence) at the P.C.R. trial, Hearing.
5. Whether P.C.R. Counsel, failed to file a motion to appeal final order of the P.C.R. claim.

In The South Carolina Supreme Court

Akella Rex Brown 310705

2013-CP-46022.11

-VS-

EXhibit F

The State of South Carolina

Table of Authority

1. Weather-vs-state, 319 S.C. 59, 459 S.E. 2d 838 (1995)
 2. Austin-vs-state, 305 S.C. 453, 409 S.C. 2d. 395 (1991)
 3. Gibson-vs-state, 334 S.C. 515, 514 S.E. 2d. 320. (1999)
 4. Strickland-vs-Washington, 466 U.S. 668. (1986)
 5. Dawkins-vs-state, 436 S.C. 151, 155, S.E. 2d. 260 (2001)
 6. Matthews-vs-state, 2001 WL 1887491 (S.C. Sup. Ct. (2002)
 7. Fraiser-vs-state, 306 S.C. 158, 410 S.E. 2d 572 (1991)
- 6th Amendment U.S.C.A.
- 14th Amendment U.S.C.A.

In the South Carolina Supreme Court

Exhibit G

Appeal From: York County Court of Common Pleas

The Honorable John C. Hayes III Circuit

Judge 2013-CP-4602211

Notice of Intent to Appeal S.C.A.C.R. Rule 203

Alkella Rene Brown

-VS-

The State of South Carolina

Alkella Rene Brown 310205

January 22nd 2014

4450 Broad River rd

Columbia, SC 29210

S.C. Supreme Court

P.O. Box 11300

Columbia, S.C. 29211

Atty. General Office

P.O. Box 11549

Columbia, SC 29211

personally appeared His

22nd day of January, 2014

Viebi R. Padgett, Notary for SC.

My Commission expires - August 25, 2015

In The South Carolina Supreme Court

Akella Rena Brown 310705

2013-cp-4602211

-vs-

Exhibit M

The State of South Carolina

Proof of Service

I Certify under penalty of Perjury
that I have submitted A Notice of Intent
to Appeal, Denial, and Final order of P. C. R.
Claim dated ~~Dec~~ December 10th 2013...

Trial Judge order Honorable Judge
John C Hayes III in York County Court
of Common Pleas... Notice sent to S.C
Supreme Court, Clerk of Court, (Mr. Daniel Sheeouse)
and York County Clerk of Court (David Hamilton)
Atty. General (Mr. James R. Johnson) P.O. Box 11549
Columbia, S.C 29211

personally appeared

this 22nd day of January, 2014

Vickie L Padgett - notary for S.C

my commission expires August 25, 2015

Akella Brown 310705
January 22nd 2014

York County

South Carolina

CLERK OF COURT'S OFFICE
Post Office Box 649, York, South Carolina 29745-0649

Arkella Rena Brown #310705
CGGC/SRE 25
4450 Broad River Road
Columbia, SC 29210



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Mr. Brown,

A copy of your order
was sent to your court
appointed attorney on
12/11/13.

Clerk's office

This is to show the reason why
this paperwork is just now being
sent in. I just received my first
copy of the final decision on 12/16/14

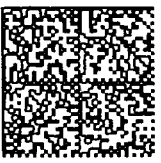
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L G G C I
4450 Beadrive Rd
Columbia, SC 29210

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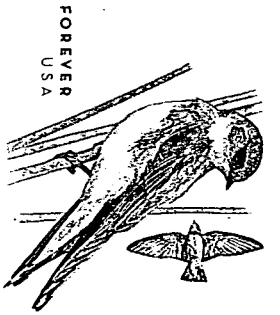
JAN 24 2014

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Mr. Daniel Shearouse
P.O. Box 11300
Columbia, SC 29211



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