

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
Appellate Case No. 2014-002346

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NOV 14 2014

APPEAL from RICHLAND COUNTY Court of Common Pleas
Alison Renée. Lee, Circuit Court Judge
Circuit Court Case No. 2013-CP-40-03525

SC Court of Appeals

City of Columbia, South Carolina,

Respondent,

v.

Marie-Thérèse Assa'ad-Faltas, MD, MPH,

Appellant.

APPELLANT'S MOTION TO APPOINT SUBSTITUTE OR ADDITIONAL COUNSEL

By her undersigned counsel, Appellant Marie-Thérèse Assa'ad-Faltas, MD, MPH, prays this Court to appoint competent appellate counsel to replace, or take the lead from, the undersigned Orin G. Briggs, who has so far served without compensation but, given his advanced age, health problems, and financial situation, cannot afford to do so for the duration of this appeal while affording his client her rights.

In further support hereof, Appellant shows the Court that she was found indigent by the lower courts but her court-appointed counsel, Tristan Michael Shaffer, abandoned Appellant's cases, causing the undersigned to volunteer in this case to prevent disastrous consequences to Appellant. Appellant has been barred from representing herself on criminal appeals and, without court-appointed counsel, would be denied her equal right to appeal, which right is afforded to all similarly situated appellants.

Appellant's counsel believes that consultation with opposing counsel is neither necessary nor proper for this motion. Therefore, he did not consult with opposing counsel before filing this motion.

WHEREFORE, competent appellate counsel should be appointed in this case and this Court should maintain supervision that such counsel faithfully discharge his/her duty to Appellant.

Respectfully submitted on November 14, 2014



Orin G. Briggs, SC Bar # 883, Volunteer Attorney for Appellant
240 Heritage Trail, Lexington, SC 29072
(803) 957-4383

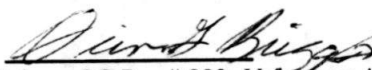
CERTIFICATE OF SERVICE

I certify that, on November 14, 2014, this document was served, by personal delivery of a copy thereof to the respective offices on the entities identified below, as proven by the attached declaration under penalty of perjury of Marie-Thérèse Assa'ad-Faltas, MD, MPH:

The City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina, 29201; and

The Attorney General of South Carolina, potential Appellate Counsel for Respondent, at his office located at 1000 Assembly Street, Columbia, South Carolina, 29201.

November 14, 2014



Orin G. Briggs, SC Bar # 883, Volunteer Attorney for Appellant

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v.

Marie-Thérèse Assa'ad-Faltas, MD, MPH,

Respondent,

Appellant.

DECLARATION UNDER PENALTY OF PERJURY AS PROOF OF SERVICE OF MOTION IN THIS APPEAL

I declare under penalty of perjury that, on November 14, 2014, God so willing, the foregoing motion in the above-captioned matter was served, by personal delivery of a complete copy thereof with and all attachments thereto, if applicable, to the respective offices of the entities identified below:

1. The City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina 29201; and
2. The Attorney General of South Carolina, potential Appellate Counsel for Respondent, at his office located at 1000 Assembly Street, Columbia, South Carolina 29201.

And further declarant saith not on November 14, 2014.


Marie-Thérèse Assa'ad-Faltas, MD, MPH