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JAN 08 2016

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of General Sessions

Maite Murphy, Circuit Court Judge

Appellate Case No.: 2015-002630

The State, Respondent,

v.

Adrienne Sabrina Randolph, Appellant.

NOTICE OF MOTION AND  
MOTION TO BE RELIEVED AS COUNSEL AND TO SUBSTITUTE THE  
SOUTH CAROLINA OFFICE OF APPELLATE DEFENSE AS COUNSEL

To: Adrienne Sabrina Randolph, Apellant  
J. Benjamin Aplin, Senior Assistant Deputy Attorney General  
Solicitor David Pascoe  
South Carolina Office of Appellate Defense


YOU WILL PLEASE TAKE NOTICE THAT Now comes Carl B. Grant,  
Esquire, trial defense attorney for the appellant, Adrienne Sabrina Randolph, and  
moves this honorable court to relieve him as counsel for the appellant and  
substitute the South Carolina Office of Appellate Defense as her counsel for the  
following reasons:

1. Upon information and belief, the appellant and her family members intend to  
assert that her guilty plea was involuntarily made in the trial court below, and that  
her attorney, Carl B. Grant, forced her to plead guilty. This allegation is expressly

denied by Mr. Grant.

2. This scenearo creates an inherant conflict of interest that in that Mr. Grant cannot zealously argue issues before this court that falsely impugns the quality of his representation of the appellant, and which he expressly denies.
3. Since the appellant has begun her active sentence, she is now indigent and in need of separate counsel to represent her on this appeal. A copy of the Appellant's Affidavit of Indigency is attached to this moton and is incorporated by reference herein.

January 8, 2016



Carl B. Grant  
SC Bar No.: 2229  
The Law Firm of Carl B. Grant, P.A.  
Post Office Box 1203  
Orangeburg, South Carolina 29116  
(803) 536-4011  
Attorney for Appellant

Other Counsel of Record:  
B. Harrison Bell and Joshua A. Edwards  
Assistant Solicitors  
Post Office Box 1525  
Orangeburg, South Carolina 29116  
(803) 533-6252  
Attorneys for Respondent

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STATE OF SOUTH CAROLINA )  
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COUNTY OF ORANGEBURG )  
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STATE OF SOUTH CAROLINA, )  
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VS. )  
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Adrienne Randolph, )  
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DEFENDANT. )

IN THE GENERAL SESSIONS COURT  
FOR THE FIRST JUDICIAL CIRCUIT

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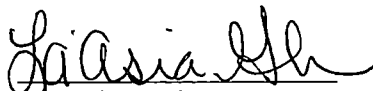
SC Court of Appeals

CERTIFICATE OF SERVICE

I, La'Asia Graham, the undersigned employee of The Law Firm of Carl B. Grant, hereby certify that a copy of the following documents has been served on the following individual by placing a copy of the same in the U.S. mail, properly addressed, and with the correct amount of postage affixed thereto:

DOCUMENT(S): Explanation of Appeal Pursuant to SCARCR 203,  
Notice of Motion and Motion to be Relieved as Counsel,  
and Affidavit of Indigency and Appointment for Counsel

SERVED ON: Adrienne Randolph, SCDC ID: 00366491  
Graham R&E Correctional Institution  
4450 Broad River Road  
Columbia, SC 29210



La'Asia Graham  
Legal Assistant  
The Law Firm of Carl B. Grant, P.A.

January 8, 2016  
Orangeburg, South Carolina

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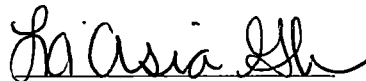
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and Affidavit of Indigency and Appointment for Counsel

SERVED ON: The Honorable David M. Pascoe  
Orangeburg County Courthouse  
P.O. Box 1525  
Orangeburg, SC 29116



La'Asia Graham  
Legal Assistant  
The Law Firm of Carl B. Grant, P.A.

January 8, 2016  
Orangeburg, South Carolina

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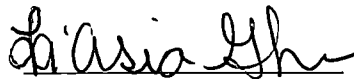
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SERVED ON: Robert Dudek, Chief of Appellate Defense Office  
Appellate Defense Office  
1330 Lady Street, Suite 401  
Columbia, SC 29201



La'Asia Graham  
Legal Assistant  
The Law Firm of Carl B. Grant, P.A.

January 8, 2016  
Orangeburg, South Carolina

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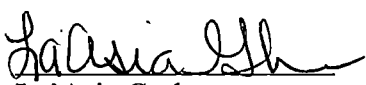
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and Affidavit of Indigency and Appointment for Counsel

SERVED ON: J. Benjamin Aplin, Interim Senior Assistant Deputy  
Attorney General  
Office of the Attorney General  
Rembert C. Dennis Building  
P.O. Box 11549  
Columbia, SC 29211

  
La'Asia Graham  
Legal Assistant  
The Law Firm of Carl B. Grant, P.A.

January 8, 2016  
Orangeburg, South Carolina