

SCHUSTERMAN LAW FIRM, P.A.

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STEPHEN D. SCHUSTERMAN

October 10, 2016

Ms. Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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OCT 13 2016

SC Court of Appeals

Re: The State v. Laterrica Hill
Appellate Case No: 2016-001955

Dear Ms. Kitchings:

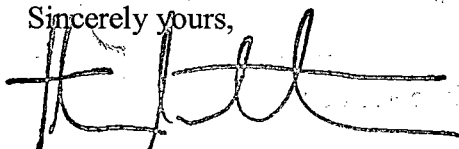
We have previously filed a Notice of Intent to Appeal in the above captioned matter. Pursuant to SCRAC Rule 203(d)(1)(B)(iv), I am providing this Court with a written explanation showing that there is an issue which can be reviewed on appeal.

I was not the attorney who represented Ms. Hill in her guilty plea. However, I have met with Ms. Hill and discussed her case and her resulting guilty plea in depth. I have requested the transcripts from her plea, however as of the date of this letter, I have not received the transcripts and thus this explanation is based upon the information provided to me by Ms. Hill and my subsequent belief based upon her account, understanding and mental state during her guilty plea.

At the time of her crime, Ms. Hill was pregnant. It is my understanding that Ms. Hill was suffering from mental issues that were not addressed nor presented to the Court prior to her guilty plea. As a result, Ms. Hill was not able to voluntarily and knowingly enter into the guilty plea. Ms. Hill was and still is unable to fully understand the consequences of her plea and the charges against her. Our Courts have repeatedly held that failure of a defendant to voluntarily and knowingly enter into a guilty plea is reviewable by this Court. See: *Roddy v. State*, 339 S.C. 29, 33, 528 S.E.2d 418, 421 (2000), *Leon v. State*, 379 S.C. 448, 666 S.E.2d 260 (S.C. App. 2008).

With kind regards, I am

Sincerely yours,



Stephen D. Schusterman

cc: Ms. Laterrica Hill
Christopher Wayne Epting, Esq.
John Benjamin Aplin, Esq.
Alan McCrory Wilson, Esq.

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