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SC Court of Appeals

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

**APPEAL FROM CHARLESTON COUNTY
Court of General Sessions**

The Honorable Diane Goodstein, Presiding Judge

**INDICTMENT NO(S): 2015GS1005147; 2014GS1800645
WARRANT NO(S): 2015A1010201016; W18160018**

STATE OF SOUTH CAROLINA, RESPONDENT

vs.

WILLIA JEAN FLOWERS , APPELLANT

NOTICE OF APPEAL

Willia Jean Flowers appeals her guilty plea and sentencing following the hearing held on September 13, 2016 before the Honorable Kristi L. Harrington, wherein she was found guilty and sentenced on September 13, 2016. Defendant filed a Motion to Withdraw the Guilty Plea and in the Alternative to Reconsider the Sentence on September 22, 2016. Judge Harrington issued an order denying this motion on October 13, 2016. The Defendant did not receive any written notice of Judge Harrington's order denying the motion until October 28, 2016 (see Exhibit A).

CP



Albert Peter Shahid III
Bar Number 102365
Attorney for Willia Jean Flowers
Charleston County Public Defender's Office
101 Meeting Street, 5th Floor
Charleston, SC 29401
(843) 954-1850

BY

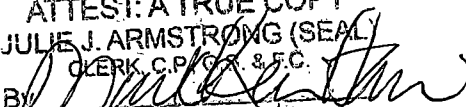
JULIE J. ARMSTRONG
CLERK OF COURT

2016 OCT 31 PM 2:46

FILED

Other counsel of record are:

Tyler S. Whitaker , Assistant Solicitor
Office of the Solicitor, Ninth Judicial Circuit
O.T. Wallace County Office Building
101 Meeting Street, 4th Floor
Charleston, SC 29401
(843) 958-1900

ATTEST: A TRUE COPY
JULIE J. ARMSTRONG (SEAL)
CLERK, C.P. & S.C.
BY 
DEPUTY CLERK

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SC Court of Appeals

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

**APPEAL FROM CHARLESTON COUNTY
Court of General Sessions**

The Honorable Kristi L. Harrington, Presiding Judge

INDICTMENT NO(S): 2015GS1005147; 2014GS1800645

WARRANT NO(S): 2015A1010201016; W18160018

STATE OF SOUTH CAROLINA, RESPONDENT

vs.

Willia Jean Flowers, APPELLANT

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Tyler S. Whitaker, Assistant Solicitor for Charleston County, by hand delivering a copy of it to the Charleston County Solicitor's Office at 101 Meeting Street, Charleston, South Carolina 29401, on October 31, 2016.



Amber S. Simmons
Paralegal to Attorney Albert Peter Shahid III
Charleston County Assistant Public Defender
O. T. Wallace County Office Building
101 Meeting Street, 5th Floor
Charleston, SC 29401
(843) 958-1850

Dated: October 31, 2016.

**CHARLESTON COUNTY PUBLIC DEFENDER
O. T. WALLACE COUNTY OFFICE BUILDING
101 MEETING STREET
CHARLESTON, SOUTH CAROLINA 29401**

(843) 958-1850

FAX (843) 958-1860

October 31, 2016

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

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Re: State of South Carolina vs. Willia Jean Flowers SC Court of Appeals

Case No(s): 2015GS1005147; 2014GS1800645

Warrant No(s): 2015A1010201016; W18160018

Charge(s): Shoplifting-Enhance, Probation Violation

Dear Ms. Kitchings:

Enclosed is the Notice of Intent to Appeal in the above-referenced case, together with appropriate Proof of Service upon the Circuit Solicitor and Proof of Filing with the local Clerk of Court. The Defendant-Appellant was represented by our office as an indigent, pursuant to the Defense of Indigents Act. By copy of this letter, I am forwarding a duplicate set of these documents to the South Carolina Commission of Appellate Defense.

As proof of filing for my records, I would appreciate it if one of your Clerks would clock the enclosed copy of this letter and return it to me in the envelope I have provided. Thank you.

Sincerely,



Albert Peter Shahid III

Bar Number 102365

Attorney for Willia Jean Flowers

Charleston County Public Defender's Office

101 Meeting Street, Suite 500

Charleston, SC 29401

Enclosure(s): As stated above

cc: South Carolina Commission of Appellate Defense

**CHARLESTON COUNTY PUBLIC DEFENDER
O. T. WALLACE COUNTY OFFICE BUILDING
101 MEETING STREET
CHARLESTON, SOUTH CAROLINA 29401**

(843) 958-1850

FAX (843) 958-1860

October 31, 2016

South Carolina Appellate Defense Commission
PO Box 11589
Columbia, South Carolina 29211

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SC Court of Appeals

Re: State of South Carolina vs. Willia Jean Flowers

Case No(s): 2015GS1005147; 2014GS1800645

Warrant No(s): 2015A1010201016; W18160018

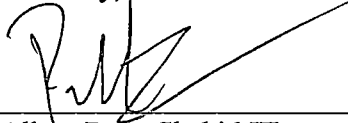
Charge(s): Shoplifting-Enhance, Probation Violation

Dear Sir/Madam:

Enclosed herein is a duplicate set of the Appeal papers, which I have forwarded to the Clerk of the South Carolina Court of Appeals concerning the above-subject defendant. This defendant was represented by our office as an indigent, pursuant to the Defense of Indigents Act. It is requested that your office assume the Appeal of this case.

The name of the Court Reporter is: Karen Anderson, 3592 Somerset Hills Court, Mount Pleasant, South Carolina 29466. I have enclosed documents usually requested by your office. If I can be of assistance by discussing this case with you, please do not hesitate to call.

Sincerely,



Albert Peter Shahid III

Bar Number 102365

Attorney for Willia Jean Flowers

Charleston County Public Defender's Office

101 Meeting Street, Suite 500

Charleston, SC 29401

Enclosure(s): As stated above

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SC Court of Appeals

STATE OF SOUTH CAROLINA) IN THE SOUTH CAROLINA
) COURT OF APPEALS
)
 COUNTY OF CHARLESTON) Case No(s): 2015GS1005147;
) 2014GS1800645
) Warrant No(s): 2015A1010201016;
) W18160018
)
 STATE OF SOUTH CAROLINA) Charge(s) Shoplifting-Enhance, Probation
) Violation

-Versus-

**REQUEST FOR REPRESENTATION
ON APPEAL**

**Willia Jean Flowers,
Defendant**

On behalf of the request of the above-named Defendant, to be represented by the South Carolina Commission of Appellate Defense, the undersigned attorney would show unto this Honorable Court that:

1. He is the attorney for the defendant-appellant in the above captioned case. The defendant-appellant was placed in custody immediately following conviction and sentence and was not available to personally sign this Request.
2. The defendant-appellant was represented by the Charleston County Public Defender's Office as an indigent, pursuant to the Defense of Indigent Act.
3. The defendant-appellant has been informed that he may request assistance from the South Carolina Commission of Appellate Defense in perfecting his appeal.
4. A timely Notice of Appeal has been filed on the defendant's-appellant behalf.
5. The defendant-appellant has been informed that nothing requires that office to pursue this appeal unless that office's Chief Attorney is satisfied that there is arguable merit to this appeal and that he cannot afford to hire an attorney.

At this time, the defendant-appellant requests the aid of the South Carolina Commission of Appellate Defense in perfecting his appeal to the South Carolina Court of Appeals.



Albert Peter Shahid III
Bar Number 102365
Assistant Public Defender
Charleston County Public Defender

Charleston, South Carolina

Dated: October 31, 2016.

CERTIFICATE OF SERVICE BY HAND DELIVERY

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SC Court of Appeals

I hereby certify that the Notice of Appeal regarding the case of:

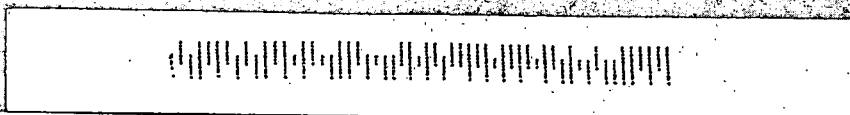
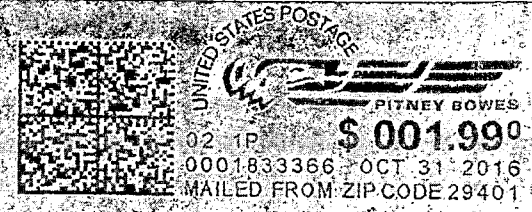
STATE V. Willia Jean Flowers

has been served on Dolore Gnock of the Ninth Circuit Solicitor's

Office, in receipt for Tyler S. Whitaker, Assistant Solicitor for the Ninth Judicial Circuit on

October 31, 2016.

Amber A. Summers
AFFIANT



CHARLESTON COUNTY PUBLIC DEFENDER
O.T. WALLACE COUNTY OFFICE BLDG.
101 MEETING STREET, 5TH FLOOR
CHARLESTON, SC 29401-2214

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SC Court of Appeals

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