

SCHUSTERMAN LAW FIRM, P.A.

Attorney at Law

541 EAST MAIN STREET · POST OFFICE BOX 4211 · ROCK HILL, SOUTH CAROLINA 29732
TELEPHONE 803 325-7788 · FACSIMILE 803 325-7889

STEPHEN D. SCHUSTERMAN

November 10, 2016

RECEIVED

NOV 16 2016

SC Court of Appeals

Ms. Laterrica Hill
418 Six Mile Creek
Rock Hill, South Carolina 29730

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

Dear Ms. Hill:

Enclosed please find a letter I received from the South Carolina Court of Appeals regarding your appeal. Pursuant to that letter, I am also enclosing a copy of the explanation I have previously sent to the Court of Appeals regarding your challenge of your guilty plea.

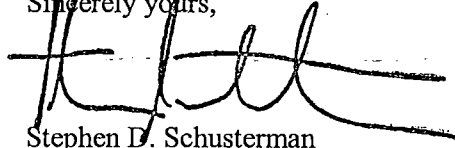
The Court of Appeals is requiring that you inform the Court in writing within twenty (20) days from the date of this letter to notify the court of any arguable basis that there are issues preserved for appeal. The letter must be sent to the Court of Appeals at the following address:

South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

If you wish to discuss this matter in further detail, please do not hesitate to contact me.

With kind regards, I am

Sincerely yours,



Stephen D. Schusterman

SDS/

Enclosure

cc: South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

November 01, 2016

Mr. Stephen D. Schusterman, Esquire
PO Box 4211
Rock Hill SC 29732

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

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SC Court of Appeals

Dear Counsel:

This Court has received your explanation for appealing.

Please forward your explanation to your client, along with a statement that your client has twenty (20) days from the date of your transmittal letter to inform this Court in writing of any arguable basis that there are issues preserved for appeal. Please provide your client with the Court's address:

South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Please send your letter to your client within ten (10) days, with a copy to this Court.

Very truly yours,

V. Elaine Allen, Deputy

CLERK

cc: Robert Michael Dudek, Esquire
Christopher Wayne Epting, Esquire
John Benjamin Aplin, Esquire
Alan McCrory Wilson, Esquire

SCHUSTERMAN LAW FIRM, P.A.

Attorney at Law

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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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NOV 16 2016

SC Court of Appeals

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

Dear Ms. Kitchings:

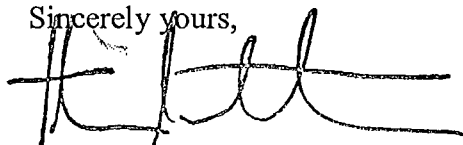
We have previously filed a Notice of Intent to Appeal in the above captioned matter. Pursuant to SCRAC Rule 203(d)(1)(B)(iv), I am providing this Court with a written explanation showing that there is an issue which can be reviewed on appeal.

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.

SCHUSTERMAN LAW FIRM, P.A.

Attorney at Law

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ROCK HILL, SOUTH CAROLINA 29732

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Columbia, SC 29211

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SC Court of Appeals

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