

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of General Sessions

Robert E. Hood, Circuit Court Judge

Appellate Case No. 2018-000341

RECEIVED
JUL 11 2018
SC Court of Appeals

THE STATE RESPONDENT.

V.

SHELBY HARPER TAYLOR APPELLANT.

**MOTION TO SUBSTITUTE *PRO BONO* COUNSEL AND
RELIEVE THE OFFICE OF APPELLATE DEFENSE**

Undersigned counsel, John H. Blume and Emily C. Paavola, respectfully move this Court to relieve the Office of Appellate Defense in this case because Blume and Paavola have agreed to represent the Appellant, Shelby Harper Taylor, *pro bono*. To support this motion, counsel would show the following:

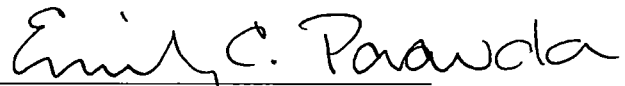
1. The present case involves an appeal from Appellant's conviction for attempted murder in Horry County on February 8, 2018. She was sentenced to twenty-five years imprisonment on February 15, 2018.

2. Shortly thereafter, Appellant and her family members communicated with undersigned counsel and requested that they consider representing Appellant in this appeal. Undersigned counsel met in person with Appellant at Graham Correctional Institution on March

20, 2018, to discuss her case. Appellant confirmed her desire that undersigned counsel represent her in this appeal, and counsel agreed to represent her in a *pro bono* capacity.

3. Therefore, Blume and Paavola request that the Office of Appellate Defense be relieved and that they be substituted as *pro bono* counsel for Appellant. Undersigned counsel have conferred with Robert M. Dudek, Chief Appellate Defender, and he has consented to this request.

Respectfully submitted,



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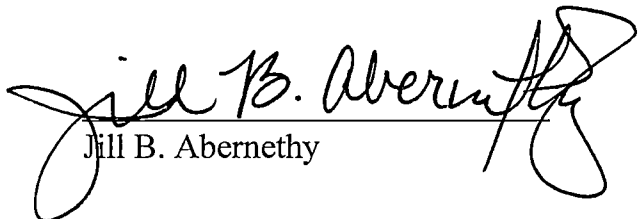
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Appellant's Motion to Substitute *Pro Bono* Counsel and Relieve the Office of Appellate Defense was served by first class United States mail, postage prepaid, this 10th day of July, 2018, upon the following:

John Benjamin Aplin, Esquire
SC Attorney General's Office
PO Box 11549
Columbia, SC 29211

Robert Dudek, Esquire
S.C. Commission on Indigent Defense
1330 Lady Street, Suite 401
Columbia, SC 29201

Scott Rian Hixson, Esquire
Fifteenth Circuit Solicitor's Office
PO Box 1276
Conway, SC 29528


Jill B. Abernethy

July 10, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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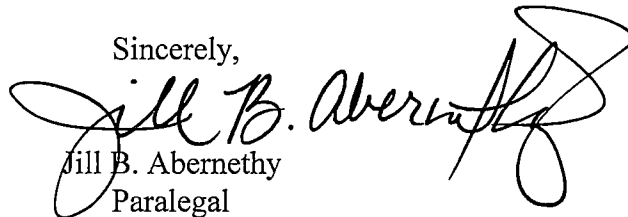
RE: *State v. Shelby Harper Taylor*
2018-000341

Dear Ms. Kitchings:

Please find enclosed for filing, along with certificate of service, the original and seven copies of Appellant's Motion to Substitute *Pro Bono* Counsel and Relieve the Office of Appellate Defense in the above captioned case. Please clock-in the extra copy and return it to me in the enclosed self-addressed stamped envelope.

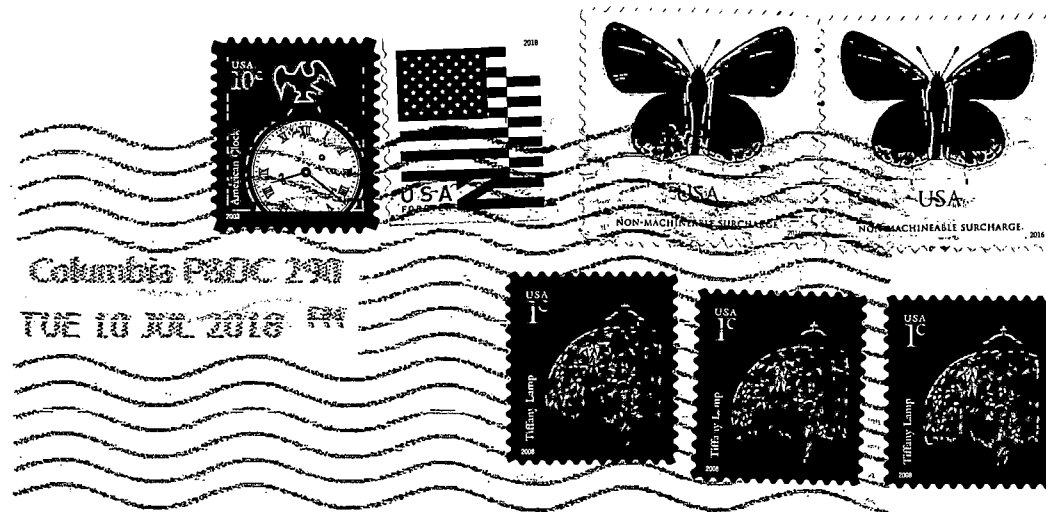
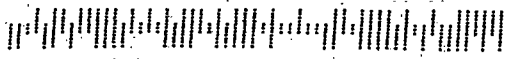
If you should need any further information, please do not hesitate to contact this office.

Sincerely,


Jill B. Abernethy
Paralegal

Enclosure

cc: John Benjamin Aplin, Esquire
Robert Dudek, Esquire
Scott Hixson, Esquire



JUSTICE (360) ADVANCING EQUALITY IN THE
CRIMINAL JUSTICE SYSTEM

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