

BEFORE THE SUPREME COURT OF SOUTH CAROLINA ("SC")

Appellate Case No. 2018-001290

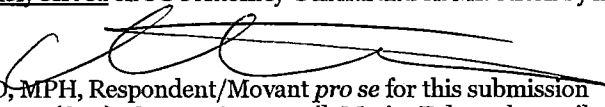
On Petition for a Writ of *Certiorari* to RICHLAND COUNTY Court of Common Pleas,
Jean Hoefer Toal, sitting as Circuit Judge on Circuit Court Case No. 2016-CP-40-01444

Marie-Thérèse Assa'ad-Faltas, MD, MPH, Respondent,
v.
The State of South Carolina, Petitioner.

**Dr. Assa'ad-Faltas' Redrafted EMERGENCY Motions to Relieve Appellate Defense
And Appoint Outside Counsel for the Rehearing**

WITHOUT waiving all her prior positions and arguments in this and related cases, Dr. Assa'ad-Faltas shows that his Court and its Clerk put her in a Catch-22. After the same SC Appellate Defense office TWICE failed her (in a prior case, as an appellant, and, here, as a respondent), if she moves for that office to be relieved due to its predicted and predictable failures in her cases **and supports her motion with facts and arguments**, *Dr. Assa'ad-Faltas' motions do NOT get filed*. See attached letter from Clerk dated TODAY. If Dr. Assa'ad-Faltas does not explain her motion, the motion gets denied under pretext that she has not shown good cause to support it. Therefore, for reasons of Appellate Defense's insistence on strategies that worse than fail (they also default federal claims over Dr. Assa'ad-Faltas' objections), Appellate Defense is moved to be relieved from this case and another counsel who understands and respects the duty to brief all PCR issues should be appointed **and enabled** to file a proper petition for rehearing which saves Dr. Assa'ad-Faltas' rights without relieving Appellate Defense to seek an immediate extension of time for rehearing to enable new counsel to consult with Dr. Assa'ad-Faltas and file a proper petition for rehearing.

Submitted on 28 February 2020 and contemporaneously served on SC's Attorney General and on Ms. Saxon by hand-delivery to their respective offices, all God so willing.


Marie-Thérèse Assa'ad-Faltas, MD, MPH, Respondent/Movant *pro se* for this submission
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S.C. SUPREME COURT