

South Carolina Court of Appeals )  
)  
)  
**The State, Respondent** )  
)  
)  
**-versus-** )  
)  
)  
)  
**Miquell Lutron Bryan,** )  
)  
)  
**Appellant.** )

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**Appellate Case No. 2020-000075**  
**Trial Court Case No. 2017GS1003228**

**MOTION TO BE RELIEVED AS COUNSEL**

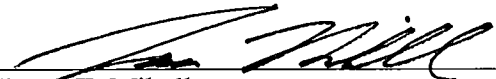
**RECEIVED**  
MAY 04 2020  
SC Court of Appeals

This motion is made by Jason T. Mikell, counsel of record, before this Honorable Court to be relieved as counsel, at the request of Mr. Miquell Lutron Bryan. Mr. Bryan's original Motion to Terminate Attorney was filed on December 31, 2019 and is attached to this motion as EXHIBIT A. This motion is the subject of the direct appeal from the Charleston County Court of General Sessions Docket No. 2017-GS-10-03228.

Although Mr. Bryan filed his Motion to Terminate Attorney and end my retained services on December 31, 2019, the trial court declined to relieve me as counsel. I represented Mr. Bryan at the trial and filed the notice of appeal in order to preserve Mr. Bryan's right to appeal his conviction. However, Mr. Bryan remains adamant that he has fired me from representing him and does want my service now or in the future. In order to preserve his rights, I have attempted to take all necessary steps with the Court of Appeals, but I do not represent him on this appeal.

This motion is respectfully submitted after meeting with Mr. Miquell Bryan, Inmate Identification Number 0282448, at the Ridgeland Correctional Institution on March 13, 2020.

I SO MOVE:



Jason T. Mikell  
Attorney at Law

Mount Pleasant, South Carolina

Dated: 5/1, 2020

STATE SOUTH CAROLINA )  
 )  
COUNTY AT CHARLESTON )  
 )  
STATE OF SOUTH CAROLINA )

Plaintiff, )

vs. )

Miguel Bryan )

Defendant, . )

IN THE COURT OF GENERAL SESSIONS  
FOR THE NINTH CIRCUIT

Case No: # 2017100GS1003231  
# 2017GS1003230  
#2017GS1003228  
# 2017 GS1003229 **229 MB**

) MOTION TO TERMINATE ATTORNEY )

COMES NOW Miguel Bryan in his proper person let it be known to the courts and all agents thereof, I waive no rights, I do claim and reserve all rights, remedies, defenses, statutorial or procedural, and I retain full constitutionally secured rights, power, privileges and prerogatives and enjoy the benefits thereof, at all times- in all places. I do waive the benefit privilege.

I move to terminate my contract with my present attorney of record and withdraw all appearances by said attorney of record and all so called pleas to the quasi in rem jurisdiction of the court by all general appearances. Made in the past by said attorney either by motion or application to this time .

The reason for such termination of attorney of record is that I believe the attorney of record is incompetent as there is no injured party"corpus delicti" before the court to give the court subject matter jurisdiction over my person. Said attorney of record as of this time has not file one Motion to Discharge /Dismiss/ Challenge Subject Matter Jurisdiction of the court, As there is also no "express" or "implied" contract before the court. That gives the court quasi in rem jurisdiction over my person.

I expressly reserve the right to represent my self or appoint a special master if needed .All future appearances either by motion or application, by me will be in my proper person as a man before the court by special limited appearances only without prejudice without waving any rights remedies or defenses statutorial or procedural. In a court of record with a competent court reporter under the Griffin Doctrine

This Termination of the present attorney of record is effective immediately .....

this 31 day of December 2019

**EXHIBIT A**

All rights expressly Reserved  
by: Miguel Bryan  
Signature

JULIE J. ARMSTRONG  
CLERK OF COURT

2019 DEC 31 PM 1:22

FILED

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
CLERK, C.E., G.S. SFC.  
By: [Signature]  
DEPUTY CLERK

321 Wingo Way, Suite 201  
Mount Pleasant, SC 29464



(843) 849-1615  
fax (843) 849-1605

May 1, 2020

The South Carolina Court of Appeals  
Honorable Jenny Abbott Kitchings  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**

MAY 04 2020

SC Court of Appeals

**RE: The State v. Miquell L. Bryan  
Appellate Case No. 2020-000075**

Dear Ms. Kitchens:

It has come to my attention that Mr. Bryan expected language and an exhibit that was not included in the original Motion to be Relieved as Counsel dated April 8, 2020. Based on Mr. Bryan's request, I respectfully resubmit my Motion to be Relieved, which now address Mr. Bryan's concerns and the preservation of his rights for purposes of this appeal.

Additionally, I would respectfully request the Court of Appeals grant an extension of time for personal service on Mr. Bryan as this Motion to be Relieved will be simultaneously sent via US Mail for Mr. Bryan's review and served upon him by the General Counsel's Office for the South Carolina Department of Corrections. If you have any questions or concerns, please do not hesitate to contact my office.

With kind regards, I am

Sincerely,



Jason T. Mikell

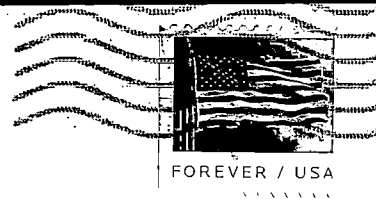
cc:

Miquell Lutron Bryant  
William M. Blich, Esquire  
Stephanie Bianco Linder, Esquire  
Robert Michael Dudek, Esquire



CHARLESTON SC 294

01 MAY 2020 PM 1 L



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

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SC Court of Appeals

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