

**The Camden Law Firm, PA**

**Robert J. Butcher  
Deborah J. Butcher**

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**RECEIVED**

**Nov 09 2021**

**SC Court of Appeals**

November 9, 2021


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

Re: The State, Respondent v. Daniel mason Hurt, Appellant

Dear Jenny Abbott Kitchings:

I filed a timely Appeal in this matter at the request of the Appellant. I also filed a motion to be relieved as counsel on the same day. **See attached.** The reason Appellant states for the appeal is that I, as his counsel, forced him into a plea deal and did not inform him that he could go to trial. **See attached email I received on behalf of Mr. Hurt.** I believe his allegations create a conflict such that I am unable to provide a written explanation showing that there is an issue which can be reviewed on appeal as required by Rule 203(d)(1)(B)(iv) of the South Carolina Appellate Court Rules. I would kindly ask that the time frame of ten (10) days to correct the deficiency be expanded until the Motion to be Relieved has been ruled on and Mr. Hurt has a reasonable amount of time to retain counsel if needed.

Sincerely,



Deborah J. Butcher  
Attorney for Appellant  
P.O. Box 610  
Camden, South Carolina 29021  
Telephone: 803-432-7599  
[dbutcher@camdensc-law.com](mailto:dbutcher@camdensc-law.com)  
S.C. Bar No.: 74029

Cc:  
Elizabeth Taylor, Esquire  
Daniel Mason Hurt  
Robert Michael Dudek, Esquire  
Alan McCrory Wilson, Esquire  
William M. Blitch, Jr., Esquire

**Subject:** Fwd: HURT, DANIEL M.

**Date:** Monday, November 1, 2021 at 5:31:25 AM Eastern Daylight Time

**From:** Melissa Bollman

**To:** Deborah Butcher

----- Forwarded message -----

From: **Melissa Bollman** <[mbollman@greenwoodsc.gov](mailto:mbollman@greenwoodsc.gov)>

Date: Mon, Nov 1, 2021 at 2:42 AM

Subject: HURT, DANIEL M.

To: Elizabeth Taylor <[etaylor@greenwoodsc.gov](mailto:etaylor@greenwoodsc.gov)>

PER KIOSK REQUEST

PLEASE EMAIL THIS TO THE COURTS OR WHOM IT MAY CONCERN  
I WOULD LIKE TO APPEAL MY GUILTY PLEA BECOUSE I WAS FORCED INTO TAKING IT AND DIDNT KNOW AT THE TIME I  
DIDNT HAVE TOO.THIS WAS DONE AT THE HANDS OF MY SOLICITOR AND MY ATTORNEY

THANK YOU FOR YOUR TIME AND ASSISTANCE

--  
***Greenwood County Detention Center***

**Captain Melissa Bollman**

**Office Number: 864-942-8676**

**Cell Number: 864-992-5520**

**Email: [mbollman@greenwoodsc.gov](mailto:mbollman@greenwoodsc.gov)**

--  
***Greenwood County Detention Center***

**Captain Melissa Bollman**

**Office Number: 864-942-8676**

**Cell Number: 864-992-5520**

**Email: [mbollman@greenwoodsc.gov](mailto:mbollman@greenwoodsc.gov)**

Find Greenwood County on social media:



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**RECEIVED**  
**Nov 03 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENWOOD COUNTY  
Court of General Sessions

Frank Addy, Circuit Court Judge

Case Nos. 2021GS2400349, 2021GS2400346, 2021GS2400354, and 2021GS2400355

The State,

Respondent,

v.

Daniel Mason Hurt,

Appellant.

**MOTION TO RELIEVE COUNSEL**

TO: ELIZABETH TAYLOR

**NOTICE**

YOU WILL PLEASE TAKE NOTICE that the attorney for Defendant will move before the presiding Judge of the South Carolina Court of Appeals to be relieved as counsel for Defendant.

**MOTION**

Defendant's counsel, Deborah J. Butcher, asks to be relieved from further representation of Defendant due to the conflict that has arisen between Defendant and her client Daniel Mason Hurt. Defendant Hurt has requested to Appeal his plea in this matter. Defendant Hurt basis his reason for his Appeal on allegations that he was forced, by Deborah J. Butcher, along with the Solicitor, into taking a plea and did not know that he did not have to take a plea. These

allegations of wrongdoing create a conflict such that Deborah J. Butcher can no longer represent Defendant.

Respectfully submitted,

THE CAMDEN LAW FIRM, PA

s/Deborah J. Butcher  
Deborah J. Butcher  
Attorney for Defendant  
507 Walnut Street  
Camden, South Carolina 29020  
Post Office Box 610  
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S.C. Bar No.: 74029

Camden, South Carolina  
November 3, 2021

**RECEIVED**  
**Nov 03 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENWOOD COUNTY  
Court of General Sessions  
Frank Addy, Circuit Court Judge

Case Nos. 2021GS2400349, 2021GS2400346, 2021GS2400354, and 2021GS2400355

The State of South Carolina,

Respondent,

v.

Daniel Mason Hurt,

Appellant.

**CERTIFICATE OF SERVICE**

I Certify that I served the **Notice of Appeal, Motion to be relieved, and Certificate of Service** on November 3, 2021 on the below listed respondents/ involved parties by depositing a copy of it in the United States Mail, that the envelopes containing said document were properly addressed, securely wrapped and sealed, and bore the proper postage; and the said envelopes were addressed to the following addresses:

Greenwood County Solicitors Office  
Elizabeth Taylor  
600 Monument Square  
Greenwood, S.C. 29556

Division of Appellate Defense  
P.O. Box 11589  
Columbia, S.C. 29211

Greenwood County Clerk of Court  
The Honorable Chastity Copeland  
528 Monument St. Rm #114  
Greenwood, S.C. 29646

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

I also certify that I have served the same upon the Greenwood County Solicitor's Office and Elizabeth Taylor and the Division of Appellate Defense by electronic mail pursuant to the Order of the Supreme Court at the following email addresses: Elizabeth

Taylor at [etaylor@greenwoodsc.gov](mailto:etaylor@greenwoodsc.gov); Wanda H. Carter at [warter@sccid.sc.gov](mailto:warter@sccid.sc.gov); Robert  
Dudek at [rdudek@sccid.sc.gov](mailto:rdudek@sccid.sc.gov).

s/Deborah J. Butcher  
Deborah J. Butcher  
Attorney for Appellant  
P.O. Box 610  
Camden, South Carolina 29021  
803-432-7599  
[dbutcher@camdensc-law.com](mailto:dbutcher@camdensc-law.com)  
S.C. Bar #: 74029

November 3, 2021  
Camden, South Carolina