

NOTICE OF APPEAL IN GENERAL SESSION

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

DEC 31 2021

SC Court of Appeals

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APPEAL FROM FAIRFIELD COUNTY

General Session Court

R. Keith Kelly, Circuit Court Judge

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Case No. 20215350660898,2021A2010100263,  
64,65,66,& 67

State of South Carolina

Respondent,

V.

Warnazia Monae Russell,

Appellant,

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NOTICE OF APPEAL

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Warnazia Russell appeals the order / judgment of the Honorable R. Keith Kelly dated December 20<sup>th</sup>, 2021. Appellant received written notice of entry of this order/ judgment on December 23<sup>th</sup>, 2021

December 27<sup>th</sup>, 2021

.

Warnazia Monae Russell

Forced to act without counsel

20 Chimney Swift Cir

Cameron, SC 29030

x Warnazia Russell

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APPEAL

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Legal Argument

1. The trial court erred in ruling that attorney Creighton B. Coleman has provided sufficient "Good Cause" to be relieved as counsel.
2. The trial court factual finding is erroneous and is not based on the record at bar.
3. The trial court erred in its ruling by failing to state findings of facts and/or conclusions of law as is required by law.
4. Trial court erred in failing to make a finding of facts determination on the prejudicial effect of relieving counsel at this critical stage of defense.
5. Trial court erred in determining that some kind of conflict of interest existed between counsel and client.
6. Trial court failed to consider defendant's motion objecting to counsel being relieved, stating the factual bases, legal objection and prejudicial effect of such request.
7. Trial court erred in not using the proper standards from the ABA and rules of professional conduct to make its legal or factual determination Rule 1.16, (1), (7), (8),
8. Trial court erred in failing to compel counsel to perform up to his constitutional obligation under the 6<sup>th</sup> amendment, and to prevent excessive delays and prejudicial effects of being without an attorney.

Conclusion

Appellant is asserting that because she is without counsel thru know fault of her own, that this motion be consider and addressed and or forwarded to the appropriate parties as to not have any procedural defaults. This motion also serves as notice for attorney Creighton B. Coleman to provide/ turn over to us all discovery material, notes, work files and any other documents in his possession regarding this case.. Furthermore , two future attorneys said that they could not inform us on what they would charge for there services or commit to taking the case because they could only go by what the charges are alleged and is requesting some kind of discovery materials to decide if they're willing to take the case. Clearly the prejudicial effect of being without counsel at this early critical stage of defense is obviously effectively denying the defendant there one fair bite of the apple. Potentially the 'cause" of any future procedural defaults thru know fault of her own.

x Wynona Ruppel 12/28/21

CC: Clerk of Court  
101 S Congress St  
Winnisboro, SC 29180

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Coleman + Tolén LLC  
P.O. Box 1006  
Winnisboro, SC 29180

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R. Keith Kelly  
125 E. Floyd Baker Blvd  
Cattery, SC 29340

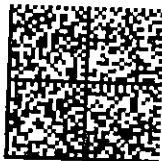
Court of Appeals  
~~1200 Senate St.~~ P.O. Box 11629  
Columbia, SC 29201 29211

Wanazim Russell  
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