

STATE of TN.

IN THE Tennessee Court of Criminal Appeals
FOR THE EASTERN DISTRICT at KNOXVILLE, TENNESSEE

v.

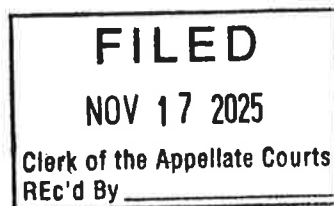
DONYELL D. HOLLAND



CASE NO:

E2024-01809-CCA-R3-CD

REQUEST NOTICE



COMES NOW, by and through pro'se counsel
Donyell Dewayne Holland. "Defendant requests
appointment of appellate counsel to assist with
proceedings. This request does not Waive Defendant's
Constitutional right to proceed pro'se. Defendant
reserves all pro'se rights and intends to continue
filing personally as necessary to protect his legal
interests."

Respectfully Submitted,
Donyell D. Holland
pro'se counsel

CERTIFICATE OF SERVICE

This is to certify that on this 13th day of November 2025 a true and exact copy of the foregoing REQUEST NOTICE has been mailed postage paid to:

BENJAMIN L. BARKER
Assistant Attorney General
State of Tennessee
P.O. Box 20207
Nashville, TN. 37202

On this 13th day of November 2025.

Donnell D. Holland
pro se litigant

RECEIVED
NOV 17 2025
Clerk of the Appellate Courts
REc'd By _____

IN THE COURT OF CRIMINAL APPEALS OF TENNESSEE
FOR THE EASTERN DIVISION
AT KNOXVILLE

FILED
NOV 17 2025
Clerk of the Appellate Courts
REc'd By _____

State of Tennessee
Appellee,

VS.

DONYELL D. HOLLAND
Appellant,

)
)
)
)
) CCA No. E2024-01809-CCA-R3-CD
) (HAMILTON COUNTY)
)
)
)

MOTION FOR APPOINTMENT OF APPELLATE COUNSEL

Comes, the Appellant, Donyell D. Holland, pro se without the aid of counsel pursuant to *T.C.A. §§ 40-14-204, 23-2-101*, and *T.R.A.P. Rule 18(f)* moves this Honorable Court to issue an **ORDER** for the appointment of counsel comparable to the State to represent the Appellant in the above caption cause. In support thereof, Appellant states as follows:

1. That Appellant is in the care and custody of the Tennessee Department of Corrections at the Morgan County Correctional Complex in Wartburg, Tennessee;
2. That the Appellant is unlearned in the law and is in need of counsel to assist in the preparation of the arguments in this inadequate brief in the above appeal because of the complex nature of the proceedings;
3. That the Appellant is indigent and lacks funds to retain counsel to represent him in this cause;
4. That Appellant is a layman in the law and possesses no specialized education and training to enable him to proceed before this Court in an adequate competent fashion

because Appellant is not trained in the basic tenets of the law to comprehend the procedural or substantive law applicable to the facts of this case;

5. This Court should deny the State motion to dismiss the appeal because even the State shows that Holland is incapable of drafting adequate brief in compliance with the appellate rules as indicated in the State's motion, thus, showing that Holland is needing this Court to appoint appellate counsel to draft and file an adequate brief addressing the issues Holland attempted to raise;

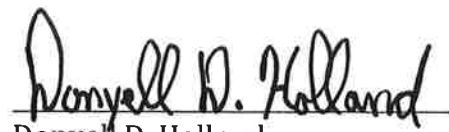
6. That Appellant has moved this Honorable Court for permission to proceed in forma pauperis and is unable to employ legal representation; and

7. That Appellant believes that he has stated sufficient grounds for relief that justifies the appointment of counsel;

8. That Appellant is in need of appointed counsel to assist him in proceeding before this Court in an adequate competent fashion, if necessary, and in all fairness, this Court should appoint counsel to assist the Appellant in this matter.

Based on the foregoing reasons, Appellant respectfully requests that this Honorable Court issue an **ORDER DENYING** the State's motion to dismiss appeal, **STRIKE** Holland's inadequate brief, and appoint appellate counsel to file an adequate brief in the above style case.

Respectfully submitted this ^{13th}~~22nd~~ day of ^{November}~~October~~, 2025.

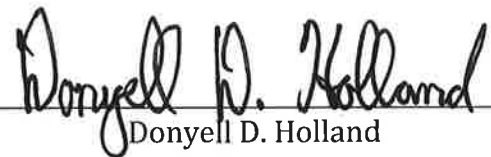

Donyell D. Holland
M.C.C.X. #248453
P.O. Box 2000
Wartburg, TN 37887

CERTIFICATE OF SERVICE

I, Donyell D. Holland, do hereby certify that a true and exact copy of the foregoing Motion for Appointment of Appellate Counsel has been placed in the U.S. Mail, First Class Postage prepaid, addressed to the following counsel for the opposing party:

BENJAMIN L. BARKER
Assistant Attorney General
State of Tennessee
P.O. Box 20207
Nashville, TN 37202

On this ~~22nd~~ ^{13th} day of ~~October~~ ^{November} 2025.

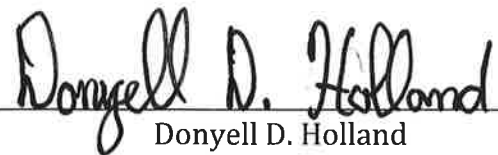


Donyell D. Holland

DECLARATION OF MAILING

I, Donyell D. Holland, declare under the penalty of perjury that I have placed the foregoing with the appropriate mailroom officials at the Morgan County Correctional Complex with sufficient First Class Postage to reach its destination.

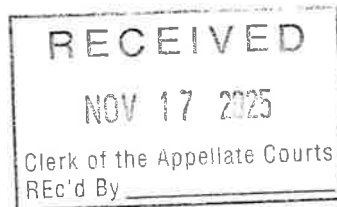
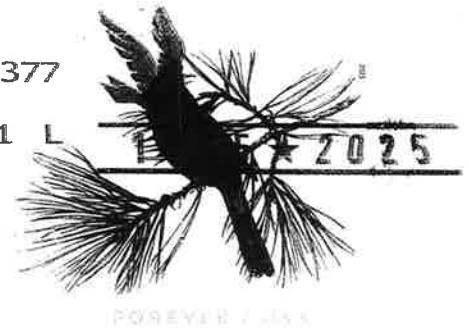
On this ~~22nd~~ ^{13th} day of ~~October~~ ^{November} 2025.



Donyell D. Holland

Donyell D. Holland #248453
Morgan County Correctional Complex
P.O. Box 2000
Wartburg, TN. 37887-2000

KNOXVILLE TN 377
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Appellate Court Clerk's Office - Knoxville
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