No. 127965

IN THE

SUPREME COURT OF ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS, Plaintiff-Appellee, -vs- ITASHA WALLS, Defendant-Appellant.	)))))))))))	Appeal from the Appellate Court of Illinois, No. 4-20-0147. There on appeal from the Circuit Court of the Seventh Judicial Circuit, Sangamon County, Illinois, No. 03-CF-1233. Honorable John Madonia, Judge Presiding.

REPLY BRIEF FOR DEFENDANT-APPELLANT

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ARGUMENT

I. The filing of a motion to reconsider the denial of a post-plea motion required by 604(d) tolls the deadline for filing a notice of appeal.

Mr. Walls and the State agree: this Court should look to the plain language of Illinois Supreme Court Rules 604 and 606 to determine whether the filing of a motion to reconsider the denial of a post-plea motion required by 604(d) tolls the deadline for filing a notice of appeal. (St. Br. 7). The most reliable indicator of the drafters' intent is the plain and ordinary meaning of the rules' language. *People v. Tousignant*, 2014 IL 115329, ¶ 8; (St. Br. 7). The State concedes that the words and phrases in the rules "should not be considered in isolation but interpreted in light of other relevant provisions and the Rules as a whole[,]" and that this Court should "consider the purpose" behind the rules in interpreting them. (St. Br. 7). And yet, the State adopts and interpretation of Rules 604(d) and 606(b) that strips those rules of critical context and undermines both the language of and the purposes of the rules. This Court should adopt Mr. Walls' interpretation of the rules, as it is the interpretation that is supported by the language and purpose of the rules. Under that interpretation of the rules, Mr. Walls' notice of appeal was timely filed. For that reason, an because Mr. Walls did not abandon his Rule 606 post-judgment motion, this Court should remand this case to the Appellate Court and direct it to address the merits of Mr. Walls' direct appeal claims.

A. Mr. Walls' interpretation gives meaning to all of the plain language in the rules, whereas the State's interpretation reads the rules in isolation and treats an entire clause as mere surplus.

While the State correctly identifies the factors this Court should consider in interpreting the plain language of Rules 604 and 606 (St. Br. 7), it promptly abandons those factors to arrive at an interpretation that does not respect the plain language of the rules. The State insists that the rules provide that a defendant only has 30 days after the denial of a Rule 604(d) post-plea motion to file a notice of appeal. (St. Br. 8-11). However, that is simply not what the rules say.

The relevant language of Rule 606(b) says:

> "No appeal form a judgment entered upon a plea of guilty shall be taken unless the defendant, within 30 days of the date on which sentence is imposed, files in the trial court a motion to reconsider sentence, if only the sentence is being challenged, or, if the plea is being challenged, a motion to withdraw the plea of guilty and vacate the judgment . . . If the motion is denied, a notice of appeal from the judgement and sentence shall be filed within the time allowed in Rule 606, measured from the date of entry of the order denying the motion."

Ill. Sup. Ct. Rule 604(d) (2022) (emphasis added). So, Rule 606(b) does not say that a notice of appeal must be filed with 30 days of the denial of the post-plea motion. That language does not appear in the rule. Instead, it says that the notice of appeal must be filed "within the time allowed in Rule 606, measured from the date of entry of the order denying the motion." Ill. Sup. Ct. Rule 604(d).

Rule 606(b) also does not simply say that a notice of appeal must be filed within 30 days. Instead it says:

> "Except as provided in Rule 604(d), the notice of appeal must be filed with the clerk of the circuit court within 30 days after the entry of the final judgement appealed from or if a motion directed against the judgment is timely filed, within 30 days after the entry of the order disposing of the motion."

Ill. Sup. Ct. Rule 606(b) (2022). So, contrary to the State's assertions, the plain language of Rule 604(d) does support its position that the notice of appeal must be filed within 30 days of the denial of a post plea motion. Instead, its says that the notice of appeal must be filed "within 30 days after the entry of the final judgment appealed from or if a motion directed against the judgment is timely filed, within 30 days after the entry of the order disposing of the motion."

Rule 604(d) states that, in applying this language from Rule 606(b) to guilty plea cases, the time to file the notice of appeal should be "measured from the date of entry of the order denying the [Rule 604(d)] motion." That means that, in a guilty plea case, starting with the day that the order is entered denying the Rule 604(d) post-plea motion, "the notice of appeal

must be filed with the clerk of the circuit court within 30 days after the entry of the final judgement appealed from or if a motion directed against the judgment is timely filed, within 30 days after the entry of the order disposing of the motion."So, the actual words used in the rules themselves contemplate the possibility that a defendant may file a Rule 606 post-judgment motion after a Rule 604(d) post-plea motion is denied, and those words also detail when the notice of appeal must be filed under such circumstances.

This is the only interpretation that gives meaning to the "shall be filed within the time allowed in Rule 606" language in Rule 604(d). If the drafters had wanted all notices of appeal in all guilty plea cases to be filed within 30 days of the denial of the Rule 604(d) post-plea motion, the drafters could have included language in Rule 606(b) to that effect. They did not. Instead the drafters chose to direct litigants and courts to the two different time frames contemplated in Rule 606(b)–one for litigants who chose to file a Rule 606 post-judgment motion, and one for those who choose not to do so.

The State complains that this reading includes phrases from both Rule 604(d) and Rule 606(b), and that doing so somehow "distorts" the words meaning. (St. Br. 9). However, it is not just Mr. Walls who asks this Court to consider the two rules in tandem–the rules themselves directly reference one another. Ill. Sup. Ct. Rules 604(d) and 606(b). And even the State acknowledges that "[w]ords and phrases should not be considered in isolation but interpreted in light of other relevant provisions and the Rules as a whole." (St. Br. 7, citing *Tousignant*, 2014 IL 115329, ¶ 8).

The State also misconstrues the language in Rule 606(b) which reads, "Except as provided in Rule 604(d), the notice of appeal must be filed with the clerk of the circuit court within 30 day after the entry of the final judgement appealed[.]" (St. Br. 10). The State asserts that this clause means that the portion of Rule 606(b) detailing the time frame for filing a notice

appeal does *not* apply to Rule 604(d). (St. Br. 10). This interpretation is incorrect because, as explained above, Rule 606(b) explicitly states that Rule 604(d)'s time line applies to the filing of notice of appeal after a guilty plea. So, reading both rules together, the "Except as provided in Rule 604(d)" language in Rule 606(b) must instead refer to the fact that, in guilty plea cases, the 30 days to file a notice of appeal if no Rule 606 post-judgment motion is filed is "measured from the date of entry of the order denying the Rule 604(d) post-plea motion" "as provided in Rule 604(d)[.]" Ill. Sup. Ct. Rules 604(d) and 606(b). Put more simply, in most cases the thirty days to file a notice of appeal, if no Rule 606(b) post-judgment motion is filed, starts with the entry of the judgement. But, because guilty plea cases involve the special extra step of filing a 604(d) motion, the 30 days does not start to run until after that 604(d) motion is ruled upon.

Mr. Walls' interpretation of Rules 606(b) and 604(d) respects the plain meaning of every word and phrase in each rule by reading them together. The State's interpretation does not. As such, this Court should adopt Mr. Walls' interpretation.

B. Mr. Walls' interpretation of the plain language of the rules ensures an opportunity for circuit courts to correct errors while promoting finality of judgements.

The State asserts that motions to reconsider the denial of post-plea motions are unnecessary and redundant because post-plea motions filed under Rule 604(d) already provide the circuit court with an opportunity to correct any errors prior to the filing of the appeal. However, the facts of Mr. Walls' case demonstrate that the State is simply wrong. Post-plea Rule 604(d) motions give the circuit court an opportunity to address errors that occur prior to the filing of the post-plea motion. But those motions do not give the circuit court an opportunity to address errors that occur in the post-plea proceedings themselves.

Mr. Walls' case provides an example. After Mr. Walls pled guilty and was sentenced, his attorney filed a Rule 604(d) post-plea motion. (C 96). However, counsel failed to file a Rule 604(d) certificate with the motion. As such, as a matter of law, counsel's original post-plea motion was legally deficient. *People v. Lindsay*, 239 Ill. 2d 522, 531 (2011); see also (St. Br. 18). And yet, it was accepted and ruled upon by the circuit court. (R 149-50). Under Mr. Walls' interpretation of the rules, he could bring this error before the circuit court, and the circuit court could remedy it. Then, once a proper motion was filed and ruled on in the circuit court, a direct appeal could be filed and the merits of Mr. Walls' claims could be addressed.

If this Court adopts the State's interpretation of the rules, the trial court will be stripped of that opportunity to correct its own mistakes. Instead, every single case that involves such a mistake will instead find its way to the Appellate Court's docket. The circuit clerk will have to compile and file a record. Defense counsel for that appeal will have to be retained or appointed. If counsel is appointed, the defendant will have to wait until an attorney is available to work on the case. That counsel will have to review the record. The prosecutor handling the case will have to review the record. And those attorneys will have to draft and file either briefs or a motion for summary remand. Those attorneys' supervisors will have to review and approve those pleadings before they are filed. Then three justices of the Appellate Court will have to familiarize themselves with the record and those pleadings. One of those justices will have to draft an order, or potentially a decision, in that appeal. The Appellate Court will then have to issue a mandate. The circuit clerk will then have to process that mandate and put the case back on the court's call. And then the circuit judge and the attorneys in the circuit court will have to re-familiarize themselves with the case before any further steps can be taken, as months or potentially years will have passed since the original ruling on the post-plea motion. More hearings will be held, and more pleadings will be filed. And then, after the parties go through

all of those extra steps, they will start the appellate process all over again, in hope that they may finally obtain a ruling on the merits of the defendant's contentions. These delays will delay finality for defendants, crime victims, and witnesses.

In other words, the State's suggested procedure, which requires the parties to go through the entire appellate process twice, instead of once, would be "redundant" and would "thwart the Court's stated interest in the finality of judgments." (St. Br. 12).

The State also suggests that problems that arise in the post-plea proceedings could be dealt with in post-conviction proceedings, rather than being addressed by a 606(b) motion filed in the trial court. (St. Br. 18). Where plea counsel fails to file a Rule 604(d) motion at all, that ineffective assistance can be addressed through post-conviction procedures. But the State fails to explain why the availability post-conviction relief for a limited sub-set of defendants means that, in cases where counsel does file a post-plea motion, the defendant should be stripped of his right to file a post-judgment Rule 606(b) motion. (St. Br. 18).

"Rule 604(d) is designed to ensure that any potential errors in the entry of the guilty plea are brought to the trial court's attention prior to filing an appeal." *People v. Easton*, 2018 IL 122187, ¶ 20. If this Court adopts Mr. Walls' interpretation of Rules 604(d) and 606(b), it will also ensure that any potential errors in the post-plea proceedings are brought to the trial court's attention prior to filing an appeal, rather than the Appellate Court having to repeatedly address an issue that could be easily resolved in the trial courts.

C. A holding that the filing of a motion to reconsider the denial of a post-plea motion required by 604(d) tolls the deadline for filing a notice of appeal would be consistent with Illinois precedent.

Contrary to the State's assertion otherwise, this Court's decision in *Sears v. Sears*, 85 Ill. 2d 253, 259 (1981) and the Appellate Court's decision in *People v. Miraglia*, 323 Ill. App. 3d 199, 205 (2d Dist. 2001) are consistent with Mr. Walls' interpretation of Rules 604(d) and 606(b). In *Sears*, this Court explained that a losing litigant should not be able to return

to the trial court indefinitely, "hoping for a change of heart or a more sympathetic judge." *Sears*, 85 Ill. 2d at 259. There must be finality in a case–a point at which the unsuccessful party must appeal or give up. *Id.,* see also*, Miraglia*, 323 Ill. App. 3d at 205-06. Under Mr. Walls' interpretation of Rules 604(d) and 606(b), the notice of appeal must be filed within 30 days of the denial of the Rule 604(d) post-plea motion, or if a Rule 606(b) post-judgment motion is filed, within 30 days of the denial of that Rule 606(b) post-judgment motion. That is the clear point at which the party must either appeal or give up.

Notably, neither *Sears* nor *Miraglia* were guilty plea appeals, so neither of those cases involved post-plea motions filed under Rule 604(d). This Court described *Sears* as "an example of endless matrimonial litigation[.]" *Sears,* 85 Ill. 2d at 256. So, when this Court addressed post-judgment motions in *Sears*, it was necessarily only discussing motions filed pursuant to Rule 606(b). There was no reason for Rule 604(d) to enter into this Court's analysis. As for *Miraglia*, while it was a criminal case, it was not a guilty plea case. *Miraglia*, 323 Ill. App. 3d at 205. No Rule 604(d) motions are filed after a trial, so Rule 604(d) was not a part of the Appellate Court's analysis.

While neither the *Sears* court nor the *Miraglia* court addressed Rule 604(d), the Fifth District of the Appellate Court did include Rule 604(d) in its analysis in *People v. Feldman,* 409 Ill. App. 3d 1124, 1127 (5th Dist. 2011). And it concluded that the filing of a single 604(d) motion, followed by the filing of a single 606(b) motion, does not constitute a violation of the rule against successive post judgment motions. *Feldman,* 409 Ill. 3d at 1127. It reasoned that, because the defendant may not appeal until after the judge rules on the post-plea motion, the denial of the post-plea motion should be considered the "final judgment" for purposes of the general rule against successive post-judgment motions. *Id.* This analysis is supported by the plain language of the final clause of Rule 604(d), which says, "a notice of appeal from the judgement and sentence shall be filed within the time allowed in Rule 606, measured from the date of entry of the order denying the [Rule 604(d)] motion." In most cases, the deadline

for filing a Rule 606(b) post-judgment motion or a notice of appeal is measured from the entry of the judgment, but in guilty plea cases it is measured form the date of the entry of the order denying the post-plea Rule 604(d) motion.

D. Rule 604(d) motions should be referred to as "post-plea motions."

While Rule 604(d) post-plea motions may have historically been referred to colloquially as post-judgment motions, that does not somehow turn them into Rule 606(b) post-judgment motions. Two cases cited by the State demonstrate this problem. (St. Br. 16). In *People v. Brooks*, 233 Ill 2d 146, 155 (2009), this Court colloquially referred to the dictates of Rule 604(d) as the "postjudgment motion" requirement. Similarly, in *People v. Flowers*, 208 Ill. 2d 291, 303 (2004), this Court noted that Rule 604(d) governs "postjudgment motions" in cases where the defendant has pleaded guilty. However, neither the *Flowers* court nor the *Brooks* court even mentioned Rule 606(b).This Court did not hold in either of those cases that a Rule 604(d) motion is the equivalent of or the same as a Rule 606(b) motion. Neither of those decisions includes an interpretation of how those two rules interact. Instead, this Court's use of the phrase "postjudgment motion" in those cases was a mere colloquialism.

Rule 604(d) itself does not describe motions filed under that rule as post-judgment motions. Instead it uses more precise language such as "motion to withdraw the plea of guilty and vacate the judgment," and "motion to reconsider the sentence." Ill. Sup. Ct. Rule 604(d). Rule 606(b) also does not use the exact phrase "post-judgment motion," but it does explicitly cover motions "directed against the judgment." Ill. Sup. Ct. Rule 606(b). Unfortunately, the same imprecise short-hand term, "post-judgment motion." has been applied to both Rule 606(b) motions and Rule 604(d) motions in cases like *Brooks* and *Flowers*, even though they are different types of motions that fulfill different purposes.

This problem is similar to the problem with the shorthand use of the term "waiver" that this Court addressed in *Hill v. Cowan*, 202 Ill. 2d 151, 158-59 (2002). In that case, this Court explained that "voluntary relinquishment of a known right" and "procedural default

by failing to bring an error to the attention of the trial court" are two separate things, and that the shorthand term "waiver" should not be used for two different concepts. Similarly the term "post-judgment motion" should not be used for two different types of motions, filed under different Supreme Court Rules for different reasons.

A better term to use for motions filed under Rule 604(d) going forward would be "post-plea motions," as it has already been used as an alternative to "post-judgment motion" in every district of the Appellate Court for decades. See, *e.g.,People v. Liner*, 2015 IL App (3d) 140167, ¶ 7; People *v. Richard,* 2012 IL App (5th) 100302, ¶ 16; *People v. Love*, 385 Ill. App. 3d 736, 737 (2d Dist. 2008); *People v. Grice*, 371 Ill. App. 3d 813, 814 (4th Dist. 2007); *People v. Dunn*, 342 Ill. App. 3d 872, 876 (1st Dist. 2003). This Court has also already adopted the term "postplea motion" in some of its decisions. See, *e.g., People v. Sophanavong*, 2020 IL 124337, ¶ 2; *In re H.L.*, 2015 IL 118529, ¶ 1. Using the term "post-plea motions," to describe motions filed under Rule 604(d) would help to eliminate the confusion surrounding this area of law.

E. While this Court could grant Mr. Walls supervisory relief to address the injustice that has occurred in his case, this Court is not obliged to grant supervisory relief to any defendant.

The State suggests that defendants, like Mr. Walls, whose attorneys fail to comply with the dictates of Rule 604(d) can simply seek supervisory relief from this Court. Mr. Walls certainly would not object to the Court exercising its supervisory authority to order the Appellate Court to address the merits of his appeal. This Court does have broad supervisory authority under the Illinois Constitution. Ill. Const. 1970, art. VI § 16; *People v. Relerford*, 2017 IL 121094, ¶ 76. But, while litigants who have no other recourse may certainly ask this Court to grant them supervisory relief, nothing in Illinois law gives litigants an absolute right to obtain such relief. In *People v. Heddins*, 66 Ill. 2d 404, 407 (1977) this Court even noted that its decision not to enter a supervisory order in a particular case is not to be interpreted as approval of the actions of the circuit court. So, while this Court could use its supervisory authority to help

some defendants who have been deprived of direct appeals, like Mr. Walls, supervisory relief is not a solution to the larger problem of the Appellate Court's inconsistent interpretation of Rules 604(d) and 606(b).

F. Mr. Walls did not abandon his post-judgment motion, as he obtained a ruling on it from the circuit court before filing his notice of appeal.

The State argues that, even if this Court adopts Mr. Walls' interpretation of the rules, it should hold htat Mr. Walls abandoned his Rule 606 post-judgment motion. (St. Br. 20). Neither this Court nor the Appellate Court should presume that Mr. Walls' post-judgment motion was abandoned. The State contends that, because Mr. Walls "did not bring the [post-judgment] motion to the trial court's attention or obtain a ruling on it, it should be presumed abandoned." (St. Br. 20). It relies exclusively on *People v. Van Hee*, 305 Ill. App. 3d 333, 335 (2d Dist. 1999) and *People v. Kelley,* 237 Ill. App. 3d 829, 831 (3d Dist. 1992) as precedent supporting this contention. However, unlike the defendants in *Van Hee* and *Kelley*, Mr. Walls did obtain a ruling on his post-judgment motion in the circuit court before appealing. As such, his motion was not abandoned.

In *Van Hee*, there was no evidence that the trial court had ever ruled on the motion to reconsider. *Van Hee*, 305 Ill. App. 3d at 335. The Second District of the Appellate Court held that, "when no ruling has been made on a motion, the motion is presumed to have been abandoned absent circumstances indicating otherwise." *Id.* The Appellate Court explained that, because the motion to reconsider was not adjudicated by the trial court, it was abandoned.

Similarly, in *Kelley*, the defendant appealed before he obtained a ruling on his post-plea motion. *Kelley*, 237 Ill. App. 3d at 831. The Third District of the Appellate Court explained that, unless a motion is brought to the attention of the circuit court and the circuit court is given an opportunity to rule on it, the motion is "not effectively made." *Id.* It also held that, when "no ruling has been made on a motion, it is presumed to have been abandoned unless the circumstances indicate otherwise." *Id.*

Mr. Walls' case is fundamentally different from *Van Hee* and *Kelley* because, in Mr. Walls' case, the post-judgment motion did come to the circuit judge's attention, and the circuit judge did rule on it, prior to the filing of the notice of appeal. In July of 2019 the circuit judge reviewed the file, noticed Mr. Walls' post-judgment motion, and noticed that it had never been ruled upon. (C 285). The primary contention in the motion was that the post-plea motion was not properly filed, as it did not include a 604(d) certificate. (C 100). The circuit court agreed, finding that a 604(d) certificate had not, in fact, been filed. (C 285). So it granted the motion to reconsider and ordered appointed counsel to file a new post-plea motion that complied with Rule 604(d). (C 285; R 173). That new post-plea motion was ultimately filed and denied. (C 399, R 232). And then, after the motion to reconsider had been granted and the subsequently filed new post-plea motion had been denied, Mr. Walls filed a notice of appeal on March 6, 2020. So, unlike the litigants in *Van Hee* and *Kelley*, Mr. Walls obtained a ruling on his motion before he appealed. As such, his motion to reconsider was not abandoned.

Mr. Walls and the State agree that the plain language of Rules 604(d) and 606(b) should govern the outcome of this case. That plain language dictates that the filing of a motion to reconsider the denial of a post-plea motion required by 604(d) tolls the deadline for filing a notice of appeal. Also, Mr. Walls obtained a ruling on his motion in the circuit court before he filed his notice of appeal, so he did not abandon it. For these reasons, this Court should remand Mr. Walls' case to the Appellate Court with directions to rule on the merits of the issues raised in the briefs below.

CONCLUSION

For the foregoing reasons, Itasha Walls respectfully requests that this Court reverse the decision of the Fourth District of the Appellate Court, and remand with directions for the Appellate Court to rule on the merits of the direct appeal claims Itasha raised in his appeal.

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this reply brief conforms to the requirements of Rules 341(a) and (b). The length of this reply brief, excluding pages containing the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341(c) certificate of compliance, and the certificate of service, is twelve pages.

/s/Roxanna A. Mason
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NOTICE AND PROOF OF SERVICE

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Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct. On June 28, 2022, the Reply Brief was filed with the Clerk of the Supreme Court of Illinois using the court's electronic filing system in the above-entitled cause. Upon acceptance of the filing from this Court, persons named above with identified email addresses will be served using the court's electronic filing system and one copy is being mailed to the defendant-appellant in an envelope deposited in a U.S. mail box in Springfield, Illinois, with proper postage prepaid. Additionally, upon its acceptance by the court's electronic filing system, the undersigned will send 13 copies of the Reply Brief to the Clerk of the above Court.

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