

Court of Appeals of the State of Georgia

ATLANTA, August 13, 2026

The Court of Appeals hereby passes the following order:

A26A2491. MICHAEL STANLEY FEW v. THE STATE.

On December 8, 2025, Michael Stanley Few pleaded guilty to trafficking methamphetamine, possession of methamphetamine with intent to distribute, fleeing/eluding law enforcement, possession and use of drug related objects, and improper display of a license plate and was sentenced to serve twenty-five years in confinement and five years on probation. On January 15, 2026, Few filed a notice of appeal from his conviction. We, however, lack jurisdiction for at least two reasons.

First, effective May 14, 2025, “[d]irect appeals from guilty pleas” must be initiated by filing an application for discretionary review. OCGA § 5-6-35(a)(5.3), (b); Ga. L. 2025, pp. 621, 623, §§ 1-2, 4-2; see *Clark v. State*, 378 Ga. App. 111, 111 n.1 (924 SE2d 346) (2025). Compliance with the discretionary appeals procedure is jurisdictional. *Hester v. State*, 378 Ga. App. 121, 121 (924 SE2d 457) (2025). Consequently, Few’s failure to comply with the discretionary review procedure deprives us of jurisdiction over this direct appeal.

Second, even if Few had a right of direct appeal, this appeal is untimely. A notice of appeal must be filed within 30 days of entry of the order to be appealed. OCGA § 5-6-38(a). Few’s notice of appeal was filed 38 days after the entry of the final disposition in his case, and it is therefore untimely. “[A] timely-filed notice of appeal is a jurisdictional prerequisite to a valid appeal.” *Henderson v. State*, 265 Ga. 317, 317 (1) (454 SE2d 458) (1995).

Additionally, Few filed a motion to withdraw his guilty plea, which was denied on January 16, 2026, but he did not timely appeal therefrom. Although the denial of

a motion to withdraw a guilty plea is directly appealable,¹ Few did not file his amended notice of appeal until March 12, 2026. See *Patel v. State*, 289 Ga. 479, 487(5) n.14 (713 SE2d 381) (2011) (finding an appeal untimely where amended notice of appeal was not filed within 30 days of the appealable order). For these reasons, this appeal is hereby DISMISSED.



Court of Appeals of the State of Georgia

Clerk's Office, Atlanta, 08/13/2026

I certify that the above is a true extract from the minutes of the Court of Appeals of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Christina Bailey Smith

, Clerk.

¹ See *Peoples v. State*, 378 Ga. App. 740, 741 n.1 (927 SE2d 351) (2026) (holding that orders denying motions to withdraw guilty plea are directly appealable).