

Initial Brief of Appellant

Exhibit B

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Aug 21 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

RICHTER & HALLER, LLC, AND GLENN P. CHURCHILL et al
Plaintiffs,

Vs.

ALLEN E. SIRES et al
Defendant DEBRA E. STOKES et al
Defendants

BY

JULIE J. ARMSTRONG
CLERK OF COURT

2010 DEC -9 PM 2:00

FILED

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

CASE No: 2008-CP-10-6453

MOTION: CONTEMPT OF COURT

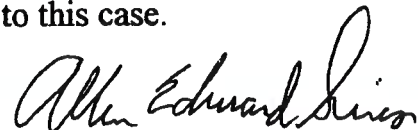
On September 17, 2010 the Honorable Deadra L. Jefferson, presiding judge in the aforementioned case, ordered Plaintiffs to communicate with defendant Allen Sires to resolve this matter.

Plaintiffs did not object to or dispute the order and were given Defendant Sires' telephone number and address on the record of court.

Defendant Sires restated this order in line 13 of his answer dated October 15, 2010. Said answer was hand delivered to The Richter Firm and the law office of Peter Shahid on the same date filed with the court. (see attachment)

As of this day December 9, 2010, Plaintiffs have made no attempt to comply with the Order of this Court.

Defendant Sires prays the court punish plaintiffs as deemed appropriate by the court and notify the appropriate authorities in the Commission on Lawyer Conduct or any entity responsible to hold plaintiffs accountable for their actions in this case and the actions that led to this case.



ALLEN EDWARD SIRES
Pro se Defendant

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

RICHTER & HALLER, L.L.C., and
GLENN P. CHURCHILL,

Plaintiffs,

vs.

ALLEN E. SIRES, and
DEBRA E. STOKES,

Defendants

2010 OCT 15 PM 4:33
JULIE J. ARMSTRONG
CLERK OF COURT

FILED

IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT
CASE NO:2008-CP-10-6453

DEFENDANT SIRES' ANSWER

1. Plaintiffs Richter and Haller did not have authority to receive any money from the Diocese of Charleston.
2. Plaintiffs Richter and Haller were instructed to communicate with The Diocese of Boston.
3. Specifically beginning with Father Sean Conner, Delegate of Investigations for the Archdiocese of Boston, who contacted Defendant Allen Sires in this action to obtain a more specific victims statement in July of 2003.
4. Plaintiffs Richter & Haller swore to Allen Sires there would be no class action suit.
5. Plaintiffs Richter and Haller failed to inform Allen Sires of a class action until after Plaintiffs Richter and Haller received partial payment for the class action agreed upon between Richter & Haller, Peter Shahid, and James Geoly of Chicago representing the Diocese of Charleston.
6. Plaintiffs Richter and Haller instructed defendant Allen sires to obtain more victims of sexual abuse with the lie that there would be no class action for those brought forward.

Richter & Haller LLC

Bea Ravenel Lewis

Attorney For Lawrence Richter

622 Johnnie Dodds
MT Pleasant

Received for W. Lewis
J. W. Lewis 10.12.10

7. Plaintiffs Richter and Haller failed to inform Defendant that his mother and deceased father were entitled to a settlement for their loss of affection as a result of the sexual abuse to the defendant.
8. Plaintiffs Richter & Haller failed to inform that defendants' children were also entitled to money for their loss of affection with Defendant Allen Sires .
9. Following the realization of the accusations of the sexual abuse by Father James Nyhan upon Allen Sires the family began to shun defendant Allen Sires. Defendant Allen Sires requested Plaintiffs Richter and Haller to end litigation with the Diocese of Charleston Instead of complying Plaintiffs Richter & Haller created an adversarial relationship with the Defendant Allen Sires and encouraged Defendant Allen Sires' family to pursue an adversarial relationship to hide their shame and make more money.
10. Defendants family shunned Allen Sires after being informed of the sexual abuse even after Father James Nyhan was convicted.
11. Until recently defendant Allen Sires was not informed that not only was Lawrence Richter a Catholic, but he was highly involved in the Catholic rites and rituals. Defendant and others agree that this fact did prevent Lawrence Richter to act in the best interest of sexual abuse survivors perpetrated by his true faith and allegiance.
12. As evidenced by the language contained in the class action suit Richter and Haller wrote, they willfully and intentionally demoralized Allen Sires and others to achieve the appearance of consent to the class action.
13. On September 17, 2010 the Honorable Debra Jefferson, Judge Circuit Court 9th circuit, ordered plaintiffs to sit down and discuss this matter with Defendant Allen Sires citing the rules of professional conduct. As of Friday October 15, 2010 Plaintiffs Richter and Haller remain in contempt of this court order.
14. This fact is demonstrative of Richter & Hallers blatant disregard for the rules of professional conduct and the rule of law.
15. The Judges Canons reads as follows, " A judge who receives information indicating a substantial likelihood that a lawyer has committed a violation of the rules of professional conduct contained in Rule 407, SCACR, should take appropriate action. A judge having knowledge that a lawyer has committed a violation of the rules of professional conduct that raises substantial question to the lawyer's honesty, trustworthiness, or fitness as a lawyer and other respects shall inform the appropriate authority."
16. Defendant Allen Sires received no notice regarding a hearing for declaratory judgment from plaintiffs Richter and Haller and demand proof thereof. Defendant

Final brief of Appellant

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Allen Sires was not notified of any hearings held in regards to case number 2008-CP-10-6453. Allen Sires received no notice of the hearings requested in collusion between Bishop Guglielmo and plaintiffs Richter and Haller, L.L.C

17. Bishop Guglielmo is responsible for Debra Stokes' claim for attorney's fees. Bishop Guglielmo is also responsible for other attorney's fees not demanded to my knowledge in this interpleader however there are other monetary demands being asserted in other courts as a direct result of plaintiffs Richter and Haller and the Diocese of Charleston.
18. Defendant Allen Sires happened to see the schedule for the hearing of September 17, 2010 on line and had no idea what motions were being presented to the court.

This action is inappropriate and should be dismissed or referred to criminal court and referred to the Attorney general of SC

Allen Sires
Allen Sires
416 Anita Drive
Goose Creek, SC, 29455

INITIAL Brief of Appellants Exhibit B

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

COUNTY OF)

Plaintiff *Richtgen & Haller LLC, Glenn Churchill et al.*
 Defendant *Allen Sires et al.*

CASE NO.
2009 CP 10 6453

MOTION AND ORDER INFORMATION
 FORM AND COVER SHEET

Plaintiff's Attorney: <i>William Bee Ruess / Lewis</i> , Bar No. <i>William H. Waring III</i> Address: phone: fax: e-mail: other:	Defendant's Attorney: <i>Allen Sires Pro Se</i> , Bar No. Address: <i>416 Anita Drive, Goose Creek SC 29445</i> phone: fax: e-mail: other: <i>241/ 843-714-9641</i>
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- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion: *Contempt of Court*
 Estimated Time Needed: Court Reporter Needed: YES / NO

SECTION II: Motion/Order Type

Written motion attached
 Form Motion/Order
 I hereby move for relief or action by the court as set forth in the attached proposed order.

Allen E. Sires
 Signature of Attorney for Plaintiff / Defendant _____ Date submitted _____

SECTION III: Motion Fee

PAID - AMOUNT:
 EXEMPT: Rule to Show Cause in Child or Spousal Support
 (check reason) Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRPC)
 Proposed order submitted at request of the court; or,
 reduced to writing from motion made in open court per judge's instructions
 Name of Court Reporter:
 Other:

JUDGE'S SECTION

Motion Fee to be paid upon filing of the attached order.
 Other:

JUDGE _____
 CODE: _____ Date: _____

CLERK'S VERIFICATION

Collected by: _____ Date Filed: _____
 MOTION FEE COLLECTED: _____
 CONTESTED - AMOUNT DUE: _____