

**RECEIVED**

**Oct 11 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA**  
In The  
Court Of Appeals

---

Appellate Case No. 2022-00357

Hon. William A. McKinnon Circuit Court Judge  
Hon. Caroline Woodruff, Probate Judge

Case No. 2021-CP-46-02764

2021-ES-46-00777

Joe L. Adams Jr., Appellant,  
v.  
Betty Ogbuneke, Respondent

---

**Motion to Disqualify**

---

*To the Court of Appeals,*

Appellant Joe L. Adams Jr. comes to the Court of Appeal to Motion for the Disqualification of Attorney William Cyrus Corbett. The attorney is a full time Magistrate Judge in Violation of South Carolina Code and according to the code the Magistrate is prohibited from representing a client as a lawyer. Attorney has been Full Time Magistrate since March of 2023 and has not disclosed the position. Attorney is in violation of Cannon 5C2, Canon 4, CJC, Rule 501, SCACR. Plaintiff contends that the Magistrate concealed this position from the court for more than 6 months and counting.

1. Plaintiff motions that the Honorable William Cyrus Corbett be disqualified from representation in these proceedings.
2. Plaintiff contends that defense attorney has been a Magistrate Judge since March of 2023 and has not disclosed his position or made any mention that he was a Full Time Magistrate.
3. Plaintiff contends that this further represents just a portion of what the Respondent and her choice of authorities may do and further supports the plaintiffs request for Co Executor of the Estate.

4. Plaintiff contends that he has reached out to the defense several times asking for some type of communication but nothing.
5. Plaintiff contends that he has live at the Estate for Lifetime and has made the Largest investment of his life in supporting the needs of the estate.
6. Plaintiff has never taken a vacation or any time because of the financial burden that he has carried prevented him from doing anything in fear that a rainy day would come.
  - a. Plaintiff contends that Mrs. Ogbuneke has put both children through school, taken several vacations, opened several businesses and currently is running the business that she started from my fathers bank account and the nurses that she met during my fathers sickness.
  - b. Plaintiff contends that Mrs. Ogbuneke did not help with the taxes from last year or the prior 18 years and has not been able to present any proof of any support to the estate through the duration of the proceedings.
7. Plaintiff contends that the he does not know how to address the Mr. Corbett and find it difficult to explain how the magistrate has been instrumental in the refusal of any communication between the parties after repeated request from the Appellant.
8. Plaintiff contends that these actions represent the future going forward of discourse and constant secret plots and schemes that cause all the fear in the plaintiff for the respondent to become the executor and ask that the Appeals court grant Full Executor of the Estate to the Plaintiff for the Peace in the family.

#### Conclusion

Plaintiff ask that the Court of Appeals disqualify Mr. William Cyrus Corbet for all the above reasons. The plaintiff further ask that in light of the investment and sweat equity that he has invested into the Estate and all the Year and Years of repairs and maintenance that he be Granted Full Executorship of the estate. The plaintiff further ask that the Appeals court consider that the plaintiff has been paying the taxes solely and the respondent has lived on and has not tried to pay anything even after all the proceedings began.. The Appellant expected that there would be some type of help but nothing.. no responses to emails.. no communication or effort to come to an agreement or try to resolve the dispute

from the Respondent or her Attorney.

With all these things the Plaintiff ask that the Court of Appeals Grant Full  
Executorship to the Appellant Joe L. Adams Jr.

Thank You,

A handwritten signature in cursive script that reads "Joe L. Adams Jr.".

Joe L. Adams Jr. 10/7/2023