

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

6955

Appellate Case No. 2013-000922

The Honorable Alison Renee Lee
Trial Court Case No. 2012-CP-40-06251

Robert J. Thomas and Rogers Townsend & Thomas, PC, Appellants

v.

Richland County Probate Court, Respondent.

RECEIVED

AUG 26 2013

SC Court of Appeals

MOTION TO REINSTATE APPEAL AND TO GRANT EXTENSION OF TIME
TO FILE AN INITIAL BRIEF AND TO DESIGNATE MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellants move the Court to reinstate their appeal and to grant them an extension of time in which to file an initial brief and to designate matter to be included in the record on appeal. This motion is based on the grounds that the failure to meet deadlines was solely that of their counsel, that the failures were inadvertent and that the failures did not prejudice and have not prejudiced the court or opposing counsel and the case should be heard on the merits. The motion is based on the attached affidavit of Robert P. Wood (counsel for the Appellants) and the attached memorandum.

{Signature on Following Page}



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Attorney for Appellants

August 23, 2013

OTHER COUNSEL OF RECORD:

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v.

Richland County Probate Court, Respondent.

AFFIDAVIT OF ROBERT P. WOOD

PERSONALLY APPEARED BEFORE ME ROBERT P. WOOD, who, after being duly sworn,
deposes and says:

1. I have represented Robert J. Thomas and Rogers Townsend & Thomas, PC (collectively the "Law Firm") in this case from its beginning.
2. The facts and procedural background set forth in the Memorandum in Support of Motion to Reinstate Appeal and Allow a Late-filed Initial Brief and Designation of Matter are true to the best of my knowledge.
3. For reasons unknown to me, I completely overlooked the email from my staff telling me that the transcript from the hearing held before the Hon. Alison R. Lee on December

11, 2012, had arrived in our offices. Hence, I did not know that the time to prepare and file an initial brief and a designation of matter to be included in the record on appeal had begun to run. The blame for this falls squarely on my shoulders and not on those of Robert J. Thomas (who is retired, practices law on a limited basis, and relied totally on me to handle this case) or on Rogers Townsend.

4. Similarly, I do not have any idea why or how I overlooked the letter from the court advising that the case might be dismissed if I did not report to the court the status of the transcript.

5. The failures were completely inadvertent.

7. I am informed and believe that if this appeal is reinstated and I am allowed to proceed with preparing and filing an initial brief and a designation of matter to be included in the record on appeal, neither this court nor the Probate Court will be prejudiced.

8. I have handled many appeals in this Court, in the South Carolina Supreme Court, in the Fourth Circuit Court of Appeals, and in two other federal courts of appeal without making any technical errors or missing any deadlines. I have handled hundreds of cases in my career (of over 32 years) without making a mistake like this. The Law Firm had every reason to believe I was handling this case competently.

9. I simply do not know how I dropped the ball in this case.

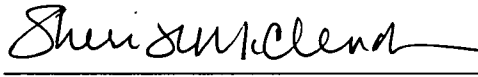
10. I am informed and believe this appeal is meritorious as is shown by the transcript from the Circuit Court hearing, by our Rule 59(e) motion, and by the memorandum of law filed herewith.

11. I am willing to file an initial brief and designation of matter to be included in the record on appeal by whatever deadline the Court decrees. I simply ask that Mr. Thomas and Rogers Townsend not be prejudiced by my failure to attend to this case.



Robert P. Wood (SC Bar No. 6206)

Sworn to before me
this 23rd day of August, 2013

 (L.S.)

Notary Public for South Carolina

My Commission Expires: 3-30-19

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STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE CIVIL COURT

ROBERT J. THOMAS AND ROGERS,)
TOWNSEND, AND THOMAS,)
P.C.,)
)
Plaintiffs,)
-vs-)
)
RICHLAND COUNTY)
PROBATE COURT,)
)
Defendant.)

TRANSCRIPT OF RECORD
12-CP-40-06251

December 11, 2012
Columbia, South Carolina

B E F O R E:

HONORABLE ALLISON R. LEE, Judge.

A P P E A R A N C E S:

ROBERT P. WOOD, Esquire
Attorney for the Plaintiffs

DESA A. BALLARD, Esquire
Attorney for the Defendant

L. COCONUT PANTSARI, R.P.R.
Circuit Court Reporter

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INDEX OF WITNESSES

(Court Reporter's Note: There was no direct or cross examination of any witnesses).

INDEX OF EXHIBITS

(Court Reporter's Note: No exhibits were marked or received into evidence).

1 (The following proceedings are reported on
2 December 11, 2012).

3 THE COURT: The first matter I have got this
4 morning at 11:00 is Robert J. Thomas and Rogers,
5 Townsend, and Thomas versus the Richland County Probate
6 Court. It's docket number 2012-CP-40-06251. The
7 plaintiff is represented by Robert Wood. The defendant
8 is represented by Desa Ballard.

9 We are here on a motion to dismiss; is that
10 correct?

11 MS. BALLARD: Yes, Your Honor, that is
12 correct.

13 THE COURT: Yes, ma'am, I will hear from you.

14 MS. BALLARD: Thank you, Your Honor. This
15 action was filed in September of 2012. It was a suit
16 for mandamus against the Richland County Probate Court.

17 As you will see from the 51-page attachments
18 that are attached to the complaint, it was a dispute --
19 or is a dispute -- between the law firm of Rogers,
20 Townsend, and Thomas and the Richland County Probate
21 Court over whether certain documents would be released.

22 We moved to dismiss this petition for writ of
23 mandamus on several grounds. The primary ground is that
24 the action fails as a matter of law under 12(b)(6)
25 because the plaintiff is seeking a mandamus in a matter

1 involving judicial discretion.

2 Clearly, the release of documents from the
3 probate file are issues of discretion by the probate
4 court. We take the position that seeking a mandamus
5 against the probate court is inappropriate in the
6 circuit court. That's a fight that should be fought in
7 the probate court as opposed to having been brought
8 separately in the circuit court.

9 I would like to hand up an order that was
10 issued in that probate court matter. The reason I have
11 not made it an exhibit is because a great deal of this
12 file is sealed because it has been determined that it's
13 not public information.

14 I would hand up a copy of an order that was
15 issued by Judge Belton, Judge Jackie Belton, on
16 October 18th.

17 (Hands to Court.)

18 MS. BALLARD: That addresses the issues that
19 the plaintiff is attempting to litigate in this court.
20 This is an order issued by Judge Belton addressing
21 continuing requests by Rogers, Townsend, and Thomas for
22 documents out of a guardianship and conservatorship
23 file.

24 That issue obviously is continuing to be
25 litigated in the probate court. So our position, Your

1 Honor, is we have several bases for the motion to
2 dismiss the action.

3 One is that mandamus is inappropriate when
4 it's talking about a matter of judicial discretion.
5 Secondly, we believe that this Court lacks subject
6 matter jurisdiction over the suit because it is actually
7 pending in the probate court; and the dispute is being
8 adjudicated there.

9 Lastly, we believe this circuit court action
10 is an action that is brought to circumvent the failure
11 to appeal certain previous orders of the probate court.
12 And bringing it through an extraordinary remedy like
13 this, we think is not a proper way to go.

14 So we are seeking a dismissal of the petition
15 in its entirety pursuant to Rule 12(b)(1) or Rule
16 12(b)(6). Thank you, Your Honor.

17 THE COURT: Ms. Ballard, if you could just
18 briefly -- I have reviewed the files. I'm not sure that
19 I'm sure exactly what, but the law firm is seeking
20 certain documents from the file?

21 MS. BALLARD: Yes, Your Honor.

22 THE COURT: And there are documents that would
23 be provided by the parties to their particular
24 conservatorship?

25 MS. BALLARD: They are documents that were in

1 the file. Some of them came from the parties. There
2 were doctors that have been involved that have submitted
3 medical reports. There's a number of documents of a
4 sensitive nature.

5 Judge Belton had ruled that some of those
6 documents of a sensitive nature would not be released.
7 We believe this petition is an improper attempt to
8 dispute the authority of the probate court.

9 THE COURT: Thank you.

10 Yes, sir, Mr. Wood.

11 MR. WOOD: Good morning, Judge Lee. I'm Bob
12 Wood on behalf of the plaintiffs. I think what
13 Ms. Ballard forgot to tell you is we were engaged -- the
14 probate court and my law firm -- were engaged in a
15 knockdown, drag-out fight that lasted for months where
16 the Court sent an order to my law firm telling us to
17 produce the will of a living person.

18 That is just unusual. We briefed it. We went
19 back and forth with briefs between me and the other
20 side. Then finally the Court entered a final order,
21 which I have now appealed to this Court.

22 But meanwhile I had a deadline coming up in
23 front of the probate court where the judge said:
24 Produce this stuff on Monday -- some Monday, whatever
25 that Monday was -- produce this stuff on Monday.

1 I was challenging the jurisdiction of the
2 Court, and I had asked the Court to: Give me proof that
3 you have personal jurisdiction over my client so that I
4 know that you have the authority to order my law firm to
5 do something as unusual as producing the will of a
6 living person.

7 The Court would not do that. So I brought
8 this lawsuit asking this Court to tell the probate
9 court: You've got to show Mr. Wood you have got
10 jurisdiction. That's all I asked.

11 THE COURT: But the will that the probate
12 court sought was of the person who was the subject of
13 the conservatorship; was it not?

14 MR. WOOD: That's right. And I am familiar
15 with that right complicated statute which deals with
16 producing a will of somebody who is a conservator.

17 When the probate court's answer in this case
18 came due, I got everything I needed. So my lawsuit was
19 moot. On the very day their answer was due, they served
20 an answer, gave me an answer. They gave me all the
21 documents I wanted so I could see if the Court had
22 personal jurisdiction.

23 Most importantly, I got a certification from
24 Ms. Ballard saying, Mr. Wood, you now have everything
25 you are looking for -- except for some things I was not

1 looking for, like health care records and stuff. I
2 don't care about that.

3 So at that point the case became moot. Also,
4 what has been left off of this conversation is
5 Ms. Ballard asked me if I would go ahead and dismiss
6 this case.

7 I asked her, While we are at it, could we ask
8 the probate judge to consider amending the order that
9 Ms. Ballard just handed up to you because it's got a
10 mistake. There are some words left off.

11 I asked if Ms. Ballard's certification could
12 be put in the probate court's order, just little things,
13 not a big deal. I asked her if she could do that. Two
14 weeks went by and she had not done it. I asked, Where
15 do you stand on that? And then the next thing I know
16 this very hearing is being scheduled.

17 Well, I'm all in favor of my lawsuit being
18 dismissed because I have gotten everything I asked for.
19 I submit that had I not brought this lawsuit, I still
20 wouldn't know that the probate court had jurisdiction to
21 order my law firm to produce the will of a living
22 person.

23 So I am all in favor of my lawsuit being
24 dismissed because it's moot. I go to great lengths
25 because I feel like there is something going on here,

1 other than what has been stated in open court; but I
2 consent to the motion to dismiss my case because it's
3 moot.

4 THE COURT: Would that take care of it?

5 MS. BALLARD: Your Honor, we would object to
6 the case being dismissed on the grounds of mootness. I
7 would hand up -- we believe the case has to be dismissed
8 on its merits.

9 We would hand up the case of Sloan versus the
10 Department of Transportation, a decision of the Supreme
11 Court issued in 2008, which provides three exceptions to
12 the mootness doctrine.

13 Those exceptions to the mootness doctrine,
14 Your Honor, they began on page 2 of this opinion on the
15 very bottom right-hand side. There are three exceptions
16 to the mootness doctrine.

17 It continues over on the next page. If the
18 issue raised is capable of repetition repetition but
19 will evade review -- that's an exception to mootness.

20 Second, a court may decide questions of
21 imperative and manifest urgency to establish a rule for
22 future conduct in matters of important public interest.

23 Third, if a decision by the trial court may
24 affect future events or have collateral consequences for
25 the parties, then the decision is not moot, even though

1 the appellate court -- meaning this Court -- could not
2 give effective relief in the present case.

3 We believe exceptions two and three apply here
4 because this is an ongoing conservatorship and
5 guardianship. How do we know that Rogers, Townsend, and
6 Thomas is not going to ask for more documents tomorrow?

7 Then this issue would no longer be moot
8 because the probate court would be put in the position
9 of having to decide: Well, can we give then these
10 documents or can we not?

11 It's clear that this issue is not moot, Your
12 Honor, because of several reasons -- arguably all three
13 reasons -- but certainly reasons two and three as set
14 forth in the Sloan case.

15 We think it's imperative that the motion --
16 excuse me -- the action be dismissed on the merits as
17 opposed to mootness because of the significance of the
18 issues presented.

19 You cannot have a law firm suing a Court
20 because the law firm does not like the ruling that the
21 Court has issued. That simply cannot be allowed to
22 occur. I think that is a matter of significant public
23 interest, and it requires the Court to address it on the
24 merits.

25 MR. WOOD: Let me address that. I'm not aware

1 of any more documents I will be asking the probate court
2 for. I'm really not.

3 But the second point, Your Honor, is
4 Ms. Ballard just said we can't allow law firms to be
5 suing judges because we don't like their rulings. That
6 is not what we did at all, not what we did at all.

7 Under an ethical rule that I will cite for you
8 in a minute.

9 THE COURT: One-point-six.

10 MR. WOOD: Rule 1.6. Because of my
11 attorney/client privilege, I cannot turn over certain
12 documents unless issued pursuant to a number of things,
13 one of which is an authorized Court order.

14 The comment -- I can't remember what comment
15 number it is -- but the comment says I have to challenge
16 or have to look into, have to investigate the authority
17 of the Court to issue the order.

18 So I just can't have some judge on the street
19 hand me an order and say, Bob give me such and such. I
20 have got to investigate the Court's authority to issue
21 that order.

22 When I tried to check into the personal
23 jurisdiction, had my client been served in the probate
24 court case, I got -- I didn't get anything. The Court
25 would not tell me if the Court had jurisdiction,

1 wouldn't give me the documents that I could see.

2 So I could have just said, Judge, I can't see
3 if your Court order is authorized. Hold me in contempt,
4 whatever you want to do; but I cannot see -- I don't
5 see -- that you have authority to issue this order.

6 So then I have two choices. I could have just
7 gone away, done nothing, gotten held in contempt, or I
8 could have brought this suit or have this Court
9 determine whether or not the Court, the probate court,
10 should turn over the affidavit of service, which is
11 really all I was looking for.

12 Well, I brought this suit and without my
13 having to ask you to order the probate court to turn
14 over the affidavit of service on the date the answer was
15 due, the probate court admitted that it did not have an
16 affidavit of service.

17 That told me that the Court who gave me the
18 order saying, Produce the will, did not have authority
19 to produce -- did not have the authority to order me to
20 produce the will.

21 Now, this suit is moot, and I'm fine with the
22 case being dismissed. I really am. If these issues
23 that Ms. Ballard raised about ability to be repeated and
24 stuff like that, number one, I don't see it coming.

25 Number two, you are not going to get a fight

1 out of me in any way related to this case. If the case
2 is -- it's fine for it to be dismissed. I got what I
3 wanted.

4 I sued for relief. On the very day the answer
5 was due, I got everything I wanted; and I don't know why
6 I am still here.

7 THE COURT: Ms. Ballard, the case that you
8 handed to me about mootness, doesn't that really apply
9 for appellate courts in reviewing trial court decisions?

10 And isn't it really designed to establish a
11 precedent, not just in that particular case, but for
12 other cases? Am I to determine whether or not an
13 appellate Court should review a matter that maybe moot
14 on trial?

15 MS. BALLARD: The case I handed up, Your
16 Honor, defines what the exceptions to mootness are.
17 While it is an appellate court decision, it would apply
18 in this circumstance. Because, in essence, what you've
19 got is you have got a law firm asking this Court to
20 review decisions of the probate court.

21 THE COURT: Well, this is a mandamus. If this
22 were an appeal, I might agree with you. But the
23 exceptions clearly talk about the appellate court taking
24 jurisdiction and the appellate court deciding questions,
25 and the appellate court cannot give effective relief;

1 whereas, in this particular case where we are talking
2 about a mandamus, that only goes to that particular fact
3 and that particular circumstance.

4 MS. BALLARD: The significance here, Your
5 Honor, is we cannot allow precedent to exist where if a
6 law firm doesn't like what a judge does, they get hauled
7 into court on a petition for a writ of mandamus.

8 The issue of what documents are going to be
9 released from this file and what documents are not going
10 to be released from the file is being litigated in the
11 probate court.

12 The order was issued on the 18th. There was a
13 subsequent order issued -- which I can hand up to the
14 Court -- on December 4, 2012. These issues are being
15 litigated in the probate court.

16 We simply cannot have -- this is a matter of
17 significant public interest -- if a law firm is going to
18 be allowed to go around a judge's ruling by filing a
19 petition for writ of mandamus in a higher Court, we
20 simply can't have that.

21 That is an issue that has got to be addressed
22 on the merits, which is why I am requesting that this
23 lawsuit be dismissed on the merits. I am requesting
24 that it be dismissed pursuant to 12(b)(1) because this
25 Court doesn't have jurisdiction and in 12(b)(6) because

1 an action for a writ of mandamus involving discretionary
2 matters are clearly not appropriate.

3 There has got to be some precedent, which
4 would be this Court's order, dismissing this case on the
5 grounds that we have set forth in our motion to dismiss,
6 not on grounds of mootness.

7 If Your Honor dismisses this case on the
8 ground of mootness, than any law firm that doesn't like
9 an order from the probate court, all they have got to do
10 is come in here and file a petition for writ of
11 mandamus; and you will hear it.

12 What would have happened if Judge Belton had
13 issued an order that said, No, Mr. Thomas, you can't
14 have those documents. Or, no, Mr. Wood, you can't have
15 those documents.

16 Then they wouldn't be able to stand here and
17 say the issue is moot. In essence what they are saying
18 is, We filed this lawsuit. We got what we wanted; so we
19 want to be able to go away.

20 The answer has to be: You can't sue a court
21 when you don't like their rulings. That has to be the
22 answer.

23 MR. WOOD: I did not sue the Court because I
24 did not like its ruling. If you read my petition for
25 writ of mandamus --

1 THE COURT: Well, I will review the documents
2 and consider the arguments, and I will issue an order.

3 MS. BALLARD: Thank you, Your Honor. The two
4 orders that I handed up are not public orders. So I
5 handed those up just for the Court's information and for
6 in-camera review.

7 THE COURT: Thank you.

8 MS. BALLARD: Thank you.

9 *** END OF REQUESTED TRANSCRIPT OF RECORD ***

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C E R T I F I C A T E

I, the undersigned L. Coconut Pantsari, Official Reporter for the Fifth Judicial Circuit of the State of South Carolina, do hereby certify that the foregoing is a true, accurate, and complete Transcript of Record of all the proceedings had and the evidence introduced in the hearing of the captioned cause, relative to appeal, in the Civil Court for Richland County, South Carolina, on the 11th day of December, 2012.

I do further certify that I am neither of kin, counsel nor interest to any party hereto.

May 20, 2013

L. Coconut Pantsari

Court Reporter

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