

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
COMMON PLEAS COURT

The Honorable Debra R. McCaslin, Judge

Lexington County Docket No.: 2024-CP-32-01087
Appellate Case No 2024-001479

New Vision Automotive and Quintin Blackmon.....Appellant.

v.

Chiquita E. Cain.....Respondent.

NOTICE OF MOTION AND MOTION TO PROCEED IN FORMA PAUPERIS

Comes now Michael Laubshire, Attorney for Respondent, who moves this Court to allow his client, Chiquita E. Cain, to proceed in this appeal without paying motion or court fees. The bases of this Motion are as follows:

1. Ms. Cain is being provided representation by South Carolina Legal Services through its Private Attorney Involvement Program. See 45 C.F.R. § 1614 (setting forth procedures and requirements);
2. South Carolina Legal Services is an organization which has as its primary purpose the furnishing of legal services to indigent persons and which is funded in substantial part by funds appropriated by the United States Government. All clients receiving services under the Private Attorney Involvement Program must meet the income and asset eligibility

requirements for general services under federal statutes and regulations governing the provision of legal services by SCLS. Based on the income and asset information provided by Respondent pursuant to federal law, the undersigned further certifies that the Plaintiff is unable to pay fees related to motions or court fees of this action and respectfully requests that the same be waived;

3. Ms. Cain has no real property, no savings or investments;
4. Ms. Cain does not have the money to pay the fees in this case;

Respectfully submitted,

/s/ Michael Laubshire

Michael Laubshire, Esq.
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Columbia, SC 29210-4476
(803)708-4755 (Phone)
(803)708-4888 (Fax)
Attorney for the Respondent

October 3, 2024
Columbia, SC

Other Counsel of Record:

John S. Keffer, Esquire
10 Law Range
Sumter, SC 29150
(803) 774-1004
Attorney for Appellant

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PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent’s Notice of Motion and Motion to Proceed In Forma Pauperis by depositing a copy of it in the United States Mail, postage prepaid, on the 3rd day of October 2024, addressed to the attorney for the Appellant as follows:

John S. Keffer, Esquire
Keffer Law Firm
10 Law Range
Sumter, SC 29150
(803) 774-1004

/s/ Victoria L. Ford
Victoria L. Ford, Paralegal
The Laubshire Law Firm