

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Case No. 2011-CP-39-0189
Appellate Case No. 2013-001628

Town of Six Mile, South Carolina, Respondent

vs.

Dan Ward, Appellant

~~MOTION~~ MOTION TO SHOW CAUSE OF RELIEF OF COUNSEL OF RECORD

Now come Dan R. Ward, Sr., Appellant; showing cause based on the following grounds: We would ask the Court to show cause for Appellant's attorney's James S. Meggs, Esquire, and George A. Taylor, Esquire being relieved as Counsel according to their Motion to be relieved in answer to Motion One which states " On May 29, 2013 an Order was entered in the Trial Court granting the Respondent Town of Six Mile certain relief. On July 10, 2013 a supplemental Order was issued which clarified in certain respects to the prior Order. The Appellant Ward was ordered to move certain "offending structures" from

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lands purportedly within the regulatory jurisdiction of the Respondent Town of Six Mile until such time as the Defendant obtained a business license from the Respondent

ANSWER TO MOTION: The initial Court Order that was issued by the Court on May 29, 2013 was unclear on moving the structures from Defendant's property (Copy of Order enclosed)

Motion #2 states " The Appellant through counsel sought Supersedeas, first by application to the Trial Court and subsequently to the South Carolina Court of Appeals. Supersedeas has been denied and there is no stay of the effect of the Trial Court's Order.

ANSWER TO MOTION # 2 Defendant realizes that Defendant's Counsel was denied Supersedeas.

MOTION # 3 states" Notwithstanding the advice of the undersigned the Appellant insists upon taking action to violate the terms of the Trial Court's Order, which action is considered by the undersigned as repugnant to the proper administration of justice and as to which there exists a fundamental disagreement between counsel and the Appellant."

ANSWER TO MOTION #3: The Appellant denies violating the terms of Trial Court's Order. I had done EVERYTHING my Counsel had advised up to this time and I wanted my Counsel to get a date set before the Honorable Letitia H. Verdin to get her to clarify the order on a time frame etc.; but my Counsel refused.

MOTION # 4 states: " The withdrawal of counsel will not materially adversely affect the interest of the Appellant."

ANSWER TO MOTION #4: The Appellant will be adversely affected and has been affected by the withdrawal of Counsel.

MOTION # 5 states: "The undersigned have requested that the Appellant consent to the relief sought herein but the Appellant has refused to execute his consent. The Appellant refuses to give consent due to section #6.

MOTION # 6 states: 'The undersigned believe that filing and briefing schedules in this matter should be suspended for a reasonable period so as to allow Appellant time to obtain other counsel. '

ANSWER TO MOTION # 6: The Appellant has tried to obtain other counsel and has been refused due to the scare actions of the Appellant Counsel. Attorney's that was contacted have knowledge of the case and do not want to be involved.

REASONS FOR APPELLANT TO ASK THE COURT MOTION TO SHOW CAUSE:

#1: Appellant feels that Counsel has violated ethics by using profanity and also using scare tactics and intimidation tactics; degrading Appellant's property and allowing Plaintiffs attorney to dictate Court Order. Appellant has been treated like a second rate citizen and feel like this should be happening in Russia, China or Germany not in American Court Rooms.

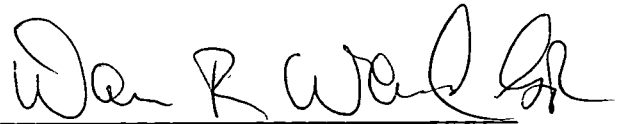
Appellant has been blown away with fees; but has paid them with sincerity (My fees should be returned due to the case of Appellant's right have been violated and due to the case being tampered with. Appellant feels like Counsel should be held responsible

for using non-professional methods and procedures and should be greatly reprimanded for his actions.

Appellant has not violated any laws and cases brought against Appellant were dismissed in Magistrate Court (Copy enclosed) All charges have been brought on by the Plaintiff (The Town of Six Mile).

WHEREFORE, the Appellant respectfully request that this Honorable Court enter its Order against James S. Meggs Esquire, and George A. Taylor, Esquire.

Respectfully Submitted.

A handwritten signature in cursive script, reading "Dan R. Ward, Sr.", written in black ink. The signature is fluid and somewhat stylized, with a horizontal line drawn underneath it.

Dan R. Ward, Sr.
281 Cedar Hill Rd.
Six Mile, S.C. 29682

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Six Mile, S.C. 29682

November 3, 2013

THE S.C. COURT OF APPEALS
P.O. Box 11629
1015 Sumter Street
Columbia, S.C. 29211

Honorable Jenny Abbott Kitchings
Clerk

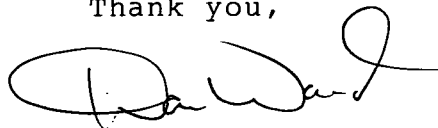
Honorable V. Claire Allen
Deputy Clerk

RE: Town of Six Mile v. Dan Ward
Appellate Case No. 2013-001628

Honorable V. Claire Allen (Deputy Clerk):

Enclosed please find my response to the motion of
my attorneys withdrawal.

Thank you,

A handwritten signature in black ink, appearing to read "Dan Ward", written in a cursive style.

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