

STATE OF SOUTH CAROLINA)
)
 COUNTY OF GREENVILLE)
)
)
 First Class Barbers, LLC,)
)
 Plaintiff)
 vs.)
)
)
 Douglas Family Partnership, et al.)
)
 Defendant)
 _____)

COURT OF COMMON PLEAS
 13TH JUDICIAL CIRCUIT

Case No. 2021-CP-23-02492

Amended Complaint
 Notice for Appeal for Dismissal



PLEASE TAKE NOTICE that the Plaintiff, Ortagus Bennett, individually and on behalf of First Class Barbers, LLC, hereby request a reconsideration to the South Carolina Court from the Order of Dismissal entered in this action on September 24, 2025, by the Honorable Vernon F. Dunbar.

Grounds for Reconsideration

Plaintiff contends that the dismissal was improper and prejudicial on the following grounds:

1. Plaintiff was deprived of counsel due to attorney error in filing substitution of counsel, not by any fault of Plaintiff, which was an attorney malpractice error.
2. Indispensable parties, including the Douglas Family Partnership, were not properly served which was an attorney malpractice error, depriving the Court of jurisdiction.
3. Plaintiff timely objected to withdrawal of counsel, yet withdrawal was granted over objection, causing severe prejudice and ultimately dismissal.
4. Plaintiff filed the objection to withdraw on 9/2/2025 which the judge did not grant or hear the motion. The relief of counsel motion should have been heard first to provide the opportunity to appeal any decision made.
4. Plaintiff was denied due process and a fair opportunity to present his case on the merits.
5. I requested for a continuance and reconsideration on 8/27/2025, and during this hearing on 8/25 my counsel was relieved, and the judge gave me 30 days to find new counsel and put on record that my case would not receive a continuance. I argued my position stating that if my counsel was released it would cause prejudice for my case to have a fair opportunity. Given

the circumstances, the judge should have never relieved my counsel knowing that it would cause my case to be dismissed on this ground and another attorney would not have the opportunity to properly research my case. I was notified of all the errors on the same date that my trial was scheduled.

6. Several motions were filed for the errors made by Arthur Aikens failure to properly be recorded as counsel of record although none of the motions were heard. The only motion that was heard was the motion dismissal.

Relief Requested

Plaintiff respectfully requests that the South Carolina Court of Appeals:

1. Accept jurisdiction over this reconsideration;
2. Vacate the Order of Dismissal entered September 24, 2025;
3. Remand the matter for proceedings on the merits with all indispensable parties properly before the Court;
4. Grant such further relief as may be just and proper.

Respectfully submitted,

Ortagus Bennett

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Date: _____