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SC Court of Appeals

The State of South Carolina
In the Court of Appeals

Appeal from Richland County
Circuit Court

Jocelyn Newman, Circuit Court judge

Lower Court Case No: 2022-CP-400-1906

Appellate Court No: 2026-000-276

Thurmond Guess Sr, -----Appellant,

v.

Pastor Darrell Jackson Sr, Marshall Green, Rosa A. English, Alfred T. Guess, Marjorie's Guess
of whom Marshall Green, Alfred T. Guess, and Marjorie Guess are the-----Respondents.

THE APPELLANT OBJECTION TO THE RESPONDENTS
REQUEST.

The Appellant will object to the request of the Respondents until the Proper Motions be filed on Rule 240 of the Appellate Court, the request do not state proper finding of counsel of Record, Both of the Respondent's Attorney are not on the Records. See Exhibit A, B, I have not heard from Attorney Abigail Rogers.

The court should Deny the Request of the Respondents Attorney Until Proper filing of Motion on Rule 240 of the Appellate Court.

RESPECTFULLY SUBMITTED

Thurmond Guess Sr
THURMOND GUESS SR.

1115 CARTER STREET APT. 224

COLUMBIA, SC 29204

(803) 862-8042

PROOF OF SERVICE

I, THURMOND GUESS SR. DO HEREBY CERTIFY THAT TRUE COPY OF THE OBJECTION TO THE RESPONDENTS REQUEST HAS BEEN SERVED ON THE ATTORNEY BY PLACING A PREPAID STAMP IN THE U.S. MAIL AT THE ADDRESS BELOW.

GEORGE JOHNSON

1615 BARNWELL STREET

COLUMBIA, SC 29202

(803) 9700

ABIGAIL ROGERS

21 BLACK GUM ROAD

COLUMBIA, SC 29209

(803) 237-7526

ADAM RUFFIN

1320 MAIN STREET, SUITE 300

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Circuit Court

Jocelyn Newman, Circuit Court Judge

Lower Court Case No. 2022-CP-40-01906

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SC Court of Appeals

Thurmond Guess, Sr., Appellant,

v.

Pastor Darrell Jackson, Marshall Green, Rose A. English, Alfred T. Guess, and Marjorie Guess,
Defendants,

of whom Marshall Green, Alfred T. Guess, and Marjorie Guess are the Respondents.

Appellate Case No. 2026-000276

MOTION TO WITHDRAW AS APPELLATE COUNSEL

Undersigned counsel was retained to represent Marjorie Guess and Alfred Guess in the lower court. Undersigned was not retained to represent Marjorie Guess and Alfred Guess on appeal; they have hired Adam Ruffin to serve as appellate counsel. As such, undersigned respectfully moves to withdraw as appellate counsel.

Respectfully submitted by:

By: s/George C. Johnson
George C. Johnson (Attorney No. 9308)
Johnson, Toal & Battiste, P.A.
P.O. Box 1431
Columbia, SC 29202
(803) 252-9700
george@jtbp.com

March 3, 2026

appellant Exhibit A

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Circuit Court

Jocelyn Newman, Circuit Court Judge

Lower Court Case No. 2022-CP-40-01906

Thurmond Guess, Sr., Appellant,

v.

Pastor Darrell Jackson, Marshall Green, Rose A. English, Alfred T. Guess, and Marjorie Guess,
Defendants,

of whom Marshall Green, Alfred T. Guess, and Marjorie Guess are the Respondents.

Appellate Case No. 2026-000276

PROOF OF SERVICE

Pursuant to Rule 262(c)(3), SCACR, undersigned counsel certifies that a copy of the motion to withdraw has been served upon Abigail Rogers and Adam Ruffin, at the primary e-mail address listed in the Attorney Information System (AIS), and upon Thurmond Guess at 1115 Carter Street, Apt. 224, Columbia, SC 29204 by depositing a copy in the U.S. mail this March 4, 2026.

By: s/George C. Johnson
George C. Johnson (Attorney No. 9308)
Johnson, Toal & Battiste, P.A.
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RUFFIN LAW FIRM, LLC
APPELLATE LITIGATION

Adam Sinclair Ruffin
1320 Main Street, Suite 300
Columbia, SC 29201
(803) 470-5629
adam@ruffinappeals.com

March 2, 2026

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Thurmond Guess, Sr. v. Marshall Green
2026-000276

Dear Ms. Kitchings:

I have been retained to serve as co-counsel for the three respondents in the above-referenced appeal. Please update your records to add my name as counsel of record for Marshall Green, Alfred Guess, and Marjorie Guess, and include me in future correspondence in this case.

Sincerely,

s/Adam Ruffin
Adam Sinclair Ruffin
Ruffin Law Firm, LLC

cc: Abigail Rogers, Esquire
George Johnson, Esquire
Thurmond Guess, Sr.

Appellant Exhibit B.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
IN THE MATTER OF:)
ALFRED TERRY GUESS)
(Decedent))

IN THE PROBATE COURT
CASE NUMBER: 2025-ES40-01836

NOTICE OF HEARING

AMY W. MCCULLOUGH
PROBATE JUDGE
RICHLAND COUNTY, S.C.

2026 FEB 23 PM 12:52

FILED

DATE: March 19, 2026

TIME: 3:00PM

PLACE: Richland County Judicial Center
1701 Main Street
Courtroom 2-F
Columbia, South Carolina 29201

PURPOSE OF HEARING*:

THIS HEARING HAS BEEN SCHEDULED TO HEAR AND DECIDE THE NOTICE OF MOTION AND MOTION TO DISMISS PLAINTIFF'S COMPLAINT AS FILED BY ATTORNEY GEORGE JOHNSON ON BEHALF OF MARJORIE GUESS.

You are required to review the entire estate file before the hearing. The court will no longer make copies of relevant documents for you to have in the hearing. You are required to bring your copies to the hearing. We encourage you to activate your SMS account to view the estate file online at the link below:
https://www7.richlandcountysc.gov/SMS_External/Login.aspx

Executed this 23rd day of February 2026.

Print Name: Lori Elrod, Clerk of Probate
Address: P.O. Box 288
Columbia, SC 29201

FOR A TRANSCRIPT OF THE PROCEEDINGS, YOU ARE REQUIRED TO PROVIDE A COURT REPORTER

NOTE: Probate Court recommends that all interested parties be represented by counsel licensed to practice law in South Carolina. If any interested party wishes to represent him/herself, he/she will be required to adhere to the *South Carolina Rules of Civil Procedure* and *South Carolina Rules of Evidence*.

*When sending Notice of Hearing to interested parties upon whom pleadings were not required to be served, attach the petition or motion to be held.

appellant Exhibit (C)