

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable
T.J. Rode, Circuit Court Judge

Case No. 2025-CP-10-06746

RECEIVED

AUG 28 2026

SC Court of Appeals

MICHEAL CHRISTOPHER FORD,
Appellant, *pro se*

v.

MILLER, DAWSON, SIGAL & WARD, LLC; RYAN MILLER, ESQ.;
BRANDON DAWSON, ESQ.; RYAN SIGAL, ESQ.; JEFFREY WARD, ESQ.; AMY
MCLAREN, ESQ.; AND PHILLIP ABSHIRE, ESQ.
Respondent(s).

MOTION AND AFFIDAVIT TO PROCEED *IN FORMA PAUPERIS* ON APPEAL

Pursuant to Rule 204 of the South Carolina Appellate Court Rules, Appellant Micheal Christopher Ford, proceeding *pro se*, respectfully moves this Honorable Court for an order permitting him to proceed *in forma pauperis* in the above-captioned appeal.

In support of this Motion, Appellant states:

1. This is an appeal from the Orders of the Honorable T.J. Rode of the Charleston County Court of Common Pleas, entered on July 31, 2026 (denying Appellant's Motion to Adjudicate and/or Quash Attorney's Lien) and August 21, 2026 (denying Appellant's

Motion for Reconsideration). A Notice of Appeal was filed contemporaneously with this Motion.

2. The filing fee for a Notice of Appeal is \$225.00.
3. The trial court previously granted Appellant's request to proceed *in forma pauperis* in the underlying action, recognizing his indigent status. A copy of the trial court's Order is on file in Case No. 2025-CP-10-06746 [EXHIBIT "A"].
4. As detailed in the Affidavit below, Appellant's financial condition has not improved and has, in fact, deteriorated. He is indigent, underemployed, without sufficient income or assets, is facing imminent eviction and vehicle repossession, and has filed for Chapter 13 Bankruptcy on August 7, 2026 (Case No.: 26-03654)
5. Due to his poverty, Appellant is wholly unable to pay the filing fees or costs associated with this appeal, or to give security therefor, without being deprived of the basic necessities of life.

WHEREFORE, Appellant Micheal Christopher Ford respectfully requests that this Court grant this Motion and enter an Order permitting him to proceed with his appeal *in forma pauperis*, thereby waiving all filing fees and costs associated with this appeal.

Respectfully submitted,



Micheal Christopher Ford, Appellant, *pro se*

PO Box 1248

Ladson, SC 29456

(843) 437-0281

micchifor@yahoo.com

Dated: August 28 2026.

AFFIDAVIT IN SUPPORT OF MOTION

PERSONALLY APPEARED BEFORE ME the undersigned, who, being first duly sworn, deposes and states as follows:

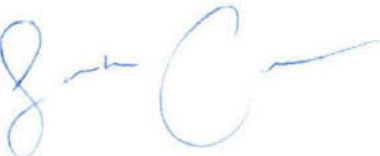
1. My name is Micheal Christopher Ford. I am the Appellant in this action, am over the age of eighteen (18), and am competent to make this Affidavit. The statements herein are based on my personal knowledge.
2. I make this Affidavit in support of my Motion to Proceed *In Forma Pauperis* on Appeal.
3. I am financially destitute. I am currently underemployed and have no source of sufficient income. My efforts to earn a living have been severely hampered by the ongoing litigation and the underlying issues giving rise to my poverty and to this appeal.
4. I have no available money in any bank accounts, no cash on hand, and I own no real property, stocks, bonds, or other assets of any significant value.
5. My monthly expenses for basic necessities such as food, shelter, and utilities exceed any income I am able to generate. I am currently facing eviction from my residence for non-payment of rent and the repossession of my only vehicle for non-payment of the car note.
6. Because of my poverty, I am unable to pay the \$225.00 filing fee for the Notice of Appeal or any other costs associated with prosecuting this appeal. Payment of such a fee would result in an undue financial hardship and would require me to forgo the basic necessities of life for myself.
7. I believe I am entitled to the relief sought in my appeal and that the appeal is brought in good faith.

I declare under penalty of perjury that the foregoing is true and correct.

FURTHER AFFIANT SAITH NOT.


Micheal Christopher Ford, Appellant, *pro se*
PO Box 1248
Ladson, SC 29456
(843) 437-0281
micchifor@yahoo.com

SWORN TO and subscribed before me this  day of August 2026.



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Notary Public for South Carolina My Commission Expires: 12/28/2028



EXHIBIT "A"

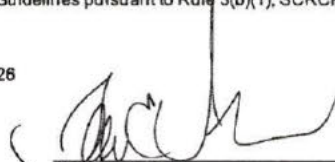
STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON	)	NINTH JUDICIAL CIRCUIT
Micheal C. Ford,	)	
Plaintiff, pro se,	)	
vs.	)	ORDER
	)	<u>IN FORMA PAUPERIS</u>
John Doe, (an unidentified driver);	)	
Liberty Surplus Insurance Corporation;	)	
Progressive Direct Insurance Company;	)	
and Uber Technologies, INC., Rasier	)	
(a/k/a Raiser), LLC; and Uber USA, LLC,	)	FILE NO.: 2025-CP-10-06746
(collectively known as and commonly	)	
referred to as UBER);	)	
Defendant(s).	)	

FILED
2025 MAR 20 PM 12:57
JULIE J. ARMSTRONG
CLERK OF COURT

ORDER

- ☒ Leave is Granted to proceed *in forma pauperis* without payment of the filing fee.
- ☐ Leave is Granted to proceed *in forma pauperis* without payment of the service cost.
- ☐ Leave is Denied to proceed *in forma pauperis* pursuant to *Ex parte Martin*, 321 S.C. 533, 471 S.E.2d 134 (1995).
- ☐ Leave is Denied to proceed *in forma pauperis*. Plaintiff has failed to establish compliance with the Poverty Guidelines pursuant to Rule 3(b)(1), SCRCP.

Dated: 3/6, 2026



Presiding Judge,
Ninth Judicial Circuit,
Charleston County, South Carolina

NOTICE TO PLAINTIFF: The Court may assess costs against either party at hearing

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CERTIFICATE OF SERVICE

I hereby certify that on this 28 day of August 2026, I have served a true and correct copy of the foregoing MOTION AND AFFIDAVIT TO PROCEED *IN FORMA PAUPERIS* upon all defense counsel of record in the state court proceeding, and upon the Chapter 13 Trustee, the Office of the United States Trustee, and the Clerk of the Charleston County Court of Common Pleas, by placing the same in the United States Mail, first-class postage prepaid, and addressed as follows:

For the Chapter 13 Trustee:

Trustee: James M. Wyman
P.O. Box 997
Mount Pleasant, SC 29465-0997

For the Court of Common Pleas:

The Honorable Julie J. Armstrong,
Charleston County Clerk of Court
100 Broad Street, Suite 106
Charleston, SC 29401

For Defendant Progressive Direct Insurance Co.:

Alfred Johnston Cox, Esq.
Gallivan, White & Boyd, P.A.
PO Box 7368
Columbia, SC 29202

jcox@gwblawfirm.com

For Defendant John Doe:

D. S. Clarke, II, Esq., & Luke A. Rankin Jr., Esq.
Luzuriaga Mims, LLP
1156 King Street
Charleston, SC 29403

sclarke@lmlawllp.com
lrankin@lmlawllp.com

For the United States Trustee:

Office of the United States Trustee
Strom Thurmond Federal Building
1835 Assembly Street, Suite 953
Columbia, SC 29201

For Defendant Liberty Surplus Insurance Corp.:

Brian P. Crotty, Esq.
Nelson Mullins Riley & Scarborough LLP
1320 Main Street, 17th Floor
Columbia, SC 29201

brian.crotty@nelsonmullins.com

For the Uber Defendants:

Kelley S. Cannon, Esq., & James P. Sullivan, Esq.
Howser, Newman & Besley, LLC
Post Office Box 12009
Columbia, SC 29211

kcannon@hnblaw.com
jsullivan@hnblaw.com

For the MDS&W, LLC Law Firm Defendants:

Wesley E. Henderson, Esq., and Ethan B. Shafer, Esq.
Henderson & Henderson, LLC
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Charleston, South Carolina 29403

wesley@hhlawsc.com
ethan@hhlawsc.com



Micheal Christopher Ford

