

753600
RECEIVED
MAR 11 2015
SC Court of Appeals

SOUTH CAROLINA
COURT OF APPEALS
1015 SUMNER STREET
COLUMBIA, SOUTH CAROLINA 29201

3-10-2015

DAVID BETHEA
V.S
STEFON QUAMINE DAVIS

JENNY ABBOTT KITCHING
CLERK OF COURT
C/A NO-13-CP-21-2726

ENCLOSED FOR FILING
UNDER RULE 240
PETITION FOR REHEARING MOTION
AFFIDAVIT + ORDER RELIEVING COUNSEL
SUPPORTING DOCUMENTS
ORIGINAL MOTION + PETITION
AND SIX COPIES
CERTIFICATE OF SERVICE
\$25.00 CAR'S MONEY ORDER FILING FEE

CERTIFICATE OF SERVICE

I DAVID BETHEA DEPOSE AND SAT
OF FULL AGE THAT I SERVED A COPY
BY USPS MAILED MARCH 10TH 2015
TO: TO ALL PARTIES

WUKEHA LAW FIRM
403 SECOND LOOP ROAD
FLORENCE, SC 29504-3057
CERTIFIED MAIL RETURN RECEIPT

TO
KING LOVE & SMITH LLC
135 SOUTH DARGAN STREET
SUITE 201
FLORENCE, SC 29506
BY USP REGULAR MAIL

DAVID BETHEA
David Beetha

P.O. Box 1861
BENNETTSVILLE, SC
29512

TO
FLORENCE COUNTY COURT
180 NORTH IRBY STREET
FLORENCE, SC 29501
USPS REGULAR MAIL

RECEIVED
MAR 11 2015
SC COURT OF APPEALS

AFFIDAVIT

RECEIVED

MAR 11 2015
SC Court of Appeals

I DAVID BETHEA DEPOSE AND SAY
UPON HIS AGE THAT THE THING I SAY
IS TRUE TO BEST OF MY KNOWLEDGE

THE LAW FIRM WUKELA ATTORNEY
FRANK C SWAGGARD WAS AS COUNSEL
BY FLORENCE COUNTY RELIEVED BY ORDER
OF BY CIRCUIT COURT JUDGE D. CRAIG BROWN
ON THE GROUND'S OF ATTORNEY-CLIENT
DETERIORATED RELATIONSHIP.

THE RECORD WILL SHOW PROBLEM OF ATTORNEY
CLIENT RELATIONSHIP.

I REQUEST THE COURT TO GRANT MY PETITION
FOR REHEARING.

FOR UNTIMELY NOTICE

DOC #1
SEE DOCUMENT WUKELA LETTER JAN. 29TH 2015
RECEIVED DAY OF HEARING ADVISED BY COURT
CLERK THE HEARING WAS OVER AND GRANTED
SEE DOC #2 REQUESTING COURT DATE OF
HEARING FROM ATTORNEY SWAGGARD OFFICE AMY
1-30-2015.
SEE DOC #3 REQUEST FOR CONSIDERATION
SEE DOC #4 NOTICE OF HEARING JAN 5TH
ONE MONTH EARLEY I WAS PRESENT HON.
CRAIG BROWN WAS PICKING SQUIRREL ON THE
5TH JAN! ADVISED BY MALISSIA COURT CLERK
THAT WUKELA LAW FIRM WAS MY ATTORNEY
UNTIL THE SUDGE SIGN THE ORDER TO
RELIEVE THEM AS COUNSEL.

SEE DOC #5 WUKEL LAW FIRM
FAILED TO FILE A MOTION TO BE RELIEVED
AS COUNSEL WITH THE MAGISTRATE COURT
DEC. 22 2014 3 MONTH BEFORE THE FIRM
WAS RELIEVED IN FLORENCE COUNTY COURT
CASE.

SEE DOC #6 THIS AND OTHER LETTER
AND NOTICE'S BEFORE THE COURT SIGNED
THE ORDER RELIEVED OF COUNSEL

SEE DOC #7 I AM STILL REQUESTING
STATUS OF THE MARLBORO COUNTY CASE

SEE DOC #8 I FOUND OUT THE STATUS
AFTER I FAXED 2-20-2015

ALSO SE DOC #10 CIVIL CASE NO.
2013-CV-34-10100959 STATE OF SOUTH CAROLINA
COUNTY OF MARLBORO DAVID BETHEA V MARSHALL
MOHAMMED AND MARSHALL TRAVEL AND TRAINING
FILED BY WUKELA LAW FIRM OCT 11, 2013
AFTER MANY REQUEST OF STATUS OF CASE
SEE DOC #8 NOTICE OF NON REPRESENTATION
I REQUEST THE APPEAL'S COURT TO MAKE
A RULING TO ORDER A HEARING OR REMAND

DAVID BETHEA
David BethEA

P.O. Box 1861
BENNETTSVILLE, SC
29512

STATE OF SOUTH CAROLINA)
)
COUNTY OF FLORENCE)

IN THE COURT OF COMMON PLEAS
C/A No. 13-CP-21-2726

DAVID BETHEA,)
)
Plaintiff,)
)
vs.)
)
STEFON QUAMINE DAVIS,)
)
Defendant.)

ORDER RELIEVING COUNSEL

FILED
2015 MAR -2 PM 4:17
CORINNE DEBEL-SHEPHERD
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, SC

This matter comes before the Court on the motion of the Plaintiff's attorney, Frank C. Swaggard of the Wukela Law Firm, for leave to withdraw as counsel of record for the Plaintiff in this action. A hearing on that motion was held on February 2, 2015. Despite being provided notice of the hearing, the Plaintiff failed to appear.

After considering the motion and the argument of counsel, the Court finds that the attorney-client relationship between the Plaintiff and his current counsel has deteriorated to the point that continued representation by Mr. Swaggard would be unreasonably difficult. So as to avoid any materially adverse effects on the Plaintiff, the Court finds that the Plaintiff should be permitted 30 days from the date of this Order in which to obtain substitute counsel, after which time he should be prepared to proceed with the prosecution of this action *pro se* (though nothing herein should be construed to preclude him from obtaining counsel at any time).

Mr. Swaggard advises that the Plaintiff's mailing address is:

DAVID BETHEA
P.O. BOX 1861
BENNETTSVILLE, S.C. 29512

DCH
1-10-12

CERTIFIED A TRUE COPY
Corinne DeBel-Shepherd
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.


All notices, orders, etc., shall be served upon the Plaintiff at this address. The Plaintiff is hereby advised that it is his duty to keep the Clerk of Court and the Defendant's attorney apprised of his current address at all times.

Based on the foregoing, and for good cause shown,

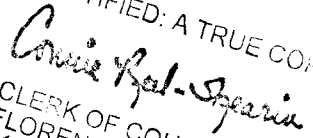
IT IS HEREBY ORDERED that the motion to withdraw is **GRANTED**. Frank C. Swaggard and the Wukela Law Firm are relieved as counsel for the Plaintiff in this action. The Plaintiff is hereby granted 30 days in which to obtain substitute counsel or be prepared to proceed *pro se*.

AND IT IS SO ORDERED.

February 23, 2015
Florence, South Carolina


D. CRAIG BROWN
CIRCUIT COURT JUDGE

FILED
2015 MAR -2 PM 4:17
CORINE BEL-SHEARIN
CLERK C.P. & G.S.
FLORENCE COUNTY, SC

CERTIFIED: A TRUE COPY

CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.
DCB
P-242

WUKELA LAW FIRM

Steve Wukela, Jr.
Benjamin D. Moore
Christi B. McDaniel
Stephen J. Wukela
Patrick J. McLaughlin
Pheobe A. Clark
Frank C. Swaggard
Jason B. Turnblad
E. Katherine Moore

403 Second Loop Road
P.O. Box 13057
Florence, SC 29504-3057

(843) 669-5634
FAX (843) 669-5150

January 29, 2015

Doc #1

David Bethea
PO Box 1861
Bennettsville, SC 29512

Re: David Bethea vs. Stefon Quamine Davis
Case No.: 2013-CP-21-2726

Dear Mr. Bethea:

Please be advised that a motion hearing has been scheduled for the above-referenced case for February 2, 2015 at 9:30 a.m. on the 5th Floor Courtroom at the Florence County Complex, 180 North Irby Street Florence S.C. 29501.

With kind regards, I am

Yours truly,

WUKELA LAW FIRM



FRANK C. SWAGGARD

FCS/agh
Enclosure

Home Mail Search News Sports Finance Weather Games Answers Screen Flickr Mobile More

Home David Settings

Compose

Navigation icons: back, forward, delete, move, more

Inbox (315)

Drafts (30)

Sent

Spam (151)

Trash

Folders (14)

KEEP (14)

untitled

untitled1

untitled2

untitled3

Smart Views

Unread

Starred

People

Social

Travel

Shopping

Finance

Recent

Sponsored



First Time Ever
Absolute Zero
\$0 Fed \$0 State
\$0 to File
TurboTax.com

* case 2013cp2102726 geico case

DOETHA

People

me

Today at 11:13 AM

To aharrell@wukelalaw.com

Dear Amy

the hearing didknot take place on the 5th of last asper notice from mr swaggart's notice

i sent him an email also mr mcgluclin received no response i requested the next date on the geico hearing and the status on the marlboro connty mahammid case.

your's truly
David Bethea

THE HONORABLE D. CRAIG BROWN

County of Florence

David Bethea

Vs.

Stephon Quamine Davis/Geico

C/A 13-CP-21-2726

the court of common pleas

DOC # 3

180 N. Irby street

2-21-2015

Florence SC 29501

Dear Judge Brown

I was not present at a motion hearing held Feb. 5th because I was not provided notice
To appear.

I did not know of any attorney-client relationship problems

This case with Wukela law firm started with Mr. Patrick MC Laughlin and turned over
To Mr. Clay swaggart

I request the court judge to reconsider its decision for the reason's stated above

A copy of this request was sent by to Wukela law firm (fax 843-669-5150)

And to King Love & Smith LLC at fax 864-538-4021

Yours truly

David Bethea



(fax) 843-679-7156

WUKELA LAW FIRM

Steve Wukela, Jr.
Benjamin D. Moore
Christi B. McDaniel
Stephen J. Wukela
Patrick J. McLaughlin
Pheobe A. Clark
Frank C. Swaggard
Jason B. Turnblad
E. Katherine Moore

403 Second Loop Road
P.O. Box 13057
Florence, SC 29504-3057

(843) 669-5634
FAX (843) 669-5150

December 22, 2014

DATED 2-20-2015
AS PER CONVERSATION
WITH MR BUTIUIOZ
AND MRS NITASHA
MEDICARE
RECOVERY CENTER

DOC #4

David Bethea
PO Box 1861
Bennettsville, SC 29512

FAX 403-569-3309

CASE NO 2012118090-03185
GEICO INS CO JAN 14TH 2011

Re: *David Bethea vs. Stefon Quamine Davis*
Case No.: 2013-CP-21-2726

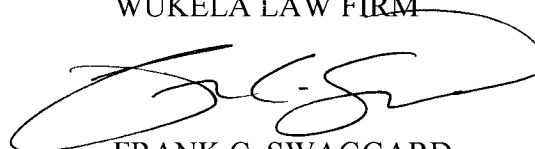
Dear Mr. Bethea:

This letter serves as notice of a roster meeting which is to take place on January 5, 2015 at approximately 9:00 a.m., although the time was not specifically noted on the correspondence I received from the court. It is my understanding that my motion to be relieved will be heard at the time of this hearing.

With kind regards, I am

Yours truly,

WUKELA LAW FIRM



FRANK C. SWAGGARD

FCS/agh
Enclosure

WUKELA LAW FIRM

Steve Wukela, Jr.
Benjamin D. Moore
Christi B. McDaniel
Stephen J. Wukela
Patrick J. McLaughlin
Pheobe A. Clark
Frank C. Swaggard
Jason B. Turnblad
E. Katherine Moore

403 Second Loop Road
P.O. Box 13057
Florence, SC 29504-3057

(843) 669-5634
FAX (843) 669-5150

DOC # 5

December 22, 2014

Marlboro County Magistrate Court
PO Box 418
Bennettsville, SC 29512

Re: David Bethea vs. Marshall Mohammed and Marshall Travel and Training
C/A No.: 2013-CV-34-10100959

Dear Sir or Madame:

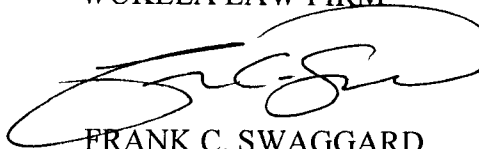
Please accept this letter as notice that I no longer represent David Bethea in the above-entitled action. This letter is being sent via the request of Beverly in your office.

All future correspondence should be directed to Mr. Bethea.

With kind regards, I am

Yours truly,

WUKELA LAW FIRM



FRANK C. SWAGGARD

FCS/agh

WUKELA LAW FIRM

Steve Wukela, Jr.
Benjamin D. Moore
Christi B. McDaniel
Stephen J. Wukela
Patrick J. McLaughlin
Pheobe A. Clark
Frank C. Swaggard
Jason B. Turnblad
E. Katherine Moore

403 Second Loop Road
P.O. Box 13057
Florence, SC 29504-3057

(843) 669-5634
FAX (843) 669-5150

Doc # 6

February 20, 2015

David Bethea
PO Box 1861
Bennettsville, SC 29512

Re: *David Bethea vs. Stefon Quamine Davis*
Case No.: 2013-CP-21-2726 &
David Bethea vs. Marshall Mohammed and Marshall Travel and Training
C/A No.: 2013-CV-34-10100959

Dear Mr. Bethea:

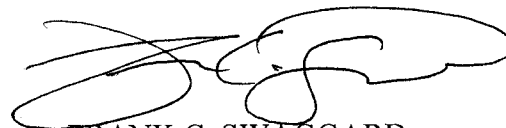
As you know, I no longer represent you on either of the above-referenced cases. I received your facsimile yesterday requesting a status update on the Marshall Mohammed case. I suggest that you contact the Marlboro County Magistrate Court for information regarding your case.

I have closed your files in my office. The Wukela Law Firm will store and maintain your files for a period of ten (10) years, after which they may either destroy or continue to maintain them at their sole unfettered discretion.

With kind regards, I am

Yours truly,

WUKELA LAW FIRM



FRANK C. SWAGGARD

FCS/agh
Enclosure

DOC. # ~~1018~~⁷

WUKELA LAW FIRM
403 SECOND LOOP Rd
FORENCE, SC 29504

2-20-2015 (FAT ⁸⁴³ 469-5150)

TO WHOM IT ^{MAY} CONCERN
I AM REQUESTING THE
STATUS OF THE MURDER CASE
IN MARLBORO COUNTY

YOURS TRULY

DAVID BETHEA

DAVID BETHEA ~~David Bethea~~

P.O. BOX 1861

BENNETTSVILLE, SC
29512

WUKELA LAW FIRM

Steve Wukela, Jr.
Benjamin D. Moore
Christi B. McDaniel
Stephen J. Wukela
Patrick J. McLaughlin
Pheobe A. Clark
Frank C. Swaggard
Jason B. Turnblad
E. Katherine Moore

Doc # 8

403 Second Loop Road
P.O. Box 13057
Florence, SC 29504-3057

(843) 669-5634
FAX (843) 669-5150

February 20, 2015

David Bethea
PO Box 1861
Bennettsville, SC 29512

Re: *David Bethea vs. Stefon Quamine Davis*
Case No.: 2013-CP-21-2726 &
David Bethea vs. Marshall Mohammed and Marshall Travel and Training
C/A No.: 2013-CV-34-10100959

Dear Mr. Bethea:

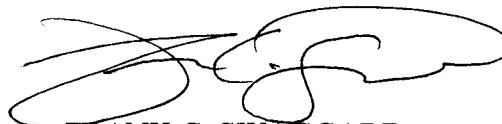
As you know, I no longer represent you on either of the above-referenced cases. I received your facsimile yesterday requesting a status update on the Marshall Mohammed case. I suggest that you contact the Marlboro County Magistrate Court for information regarding your case.

I have closed your files in my office. The Wukela Law Firm will store and maintain your files for a period of ten (10) years, after which they may either destroy or continue to maintain them at their sole unfettered discretion.

With kind regards, I am

Yours truly,

WUKELA LAW FIRM



FRANK C. SWAGGARD

FCS/agh
Enclosure

STATE OF SOUTH CAROLINA
COUNTY OF MARLBORO

) IN THE MAGISTRATE'S COURT
)
) CIVIL CASE NO.: 2013-CV-34-10100959
)

David Bethea

Doc # 19

Plaintiff,

vs.

**Marshall Mohammed and
Marshall Travel and Training,**

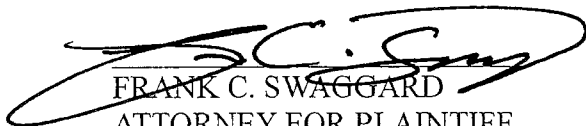
Defendants.

SUMMONS
(JURY TRIAL DEMANDED)

TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is hereby served upon you, and to serve a copy of your answer to the said Complaint on the Plaintiff at his attorney's office, Post Office Box 13057, Florence, S.C. within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint and judgment by default will be rendered against you.

October 11, 2013



FRANK C. SWAGGARD
ATTORNEY FOR PLAINTIFF
WUKELA LAW FIRM
P.O. Box 13057
Florence, SC 29502-3057
843-669-5634

SAT

WUKELA

FILED OCT 11 11 24 42

MARKBORO COUNTY
MAGISTRATE COURT
P.O. BOX 418
BENNETTSVILLE, SC
29512

RECEIVED
MAR 11 2015
SC Court of Appeals

2-10-2015

DAVID BETHEA
✓

C/A NO 2013CV
34-10100959

MARSHALL MOHAMMED
AND
MARSHALL TRAVEL AND TRAINING

DEAR SIR OR MADAME

ON DEC 22, 2014 BEVERLY
MADE A REQUEST TO WUKELA LAW FIRM
I AM REQUESTING THE NATURE
OF BEVERLY REQUEST.

AS PER THIS IS BEING APPEALED
BEFORE THE SOUTH CAROLINA COURT OF APPEALS
ALSO REQUEST ANY AND ALL INFORMATION
RELATED TO THIS CASE

P.O. BOX 1861
BENNETTSVILLE, SC
29512
Yours truly
David BETHEA
David Bethea

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

WUKELA LAW FIRM
 403 SECOND LOOP RD
 FLORENCE SC
 29504-3007

2. Article Number
 (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee
X

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail® Priority Mail Express™
 Registered Return Receipt for Merchandise
 Insured Mail Collect on Delivery

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 2013

Domestic Return Receipt

PS Form 3800, August 2006
 See Reverse for Instructions
 City, State, ZIP+4
 FLORENCE, SC 29504-3007
 Street, Apt. No.,
 or PO Box No.
 403 SECOND LOOP RD
 Sent To
 WUKELA LAW FIRM

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Postmark Here

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 OFFICIAL USE
 For delivery information visit our website at www.usps.com

7014 0510 0001 8600 6807
 7014 0510 0001 8600 6807
 7014 0510 0001 8600 6807



7014 0510 0001 8600 6807
 PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
 OF THE RETURN ADDRESS. FOLD AT DOTTED LINE
CERTIFIED MAIL™



8600 6814



1024



29201

U.S. POSTAGE
PAID
FLORENCE, SC
29501
MAR 10, 15
AMOUNT
\$11.95
00103867-11

VINA COURT OF APPEALS
2R STREET
SOUTH CAROLINA 29201