

STATE OF SOUTH CAROLINA) IN THE SUPREME COURT OF SOUTH CAROLINA
County of Spartanburg) Indictment NO: 2015-GS-420-3593

Bernard Dewberry,
Plaintiff,

) NOTICE OF MOTION AND MOTION
) TO SURRENDER PLAINTIFF'S
) ENTIRE CASE FILE

v.
Attorney Andrea L. Price Esq,
Defendant.

RECEIVED

NOV 16 2016

SC Court of Appeals

Now Comes the above Plaintiff Bernard Dewberry moving this Honorable Court for a order directing Defendant Attorney Andrea L. Price to Surrender Plaintiff's entire case file in the above case Pursuant to Matter of Haddock, 321 S.E.2d 601 (S.C. 1993) & The South Carolina Appellate Court Rules. Rules of Professional Conduct. Rule 1.16(d).

FACTS

Defendant Andrea L. Price represented the Plaintiff in the above action, and Plaintiff was found guilty & Sentenced accordingly. Ever Since thereafter Plaintiff has attempted to get Attorney Andrea L. Price Esq to Surrender Plaintiff's entire case file to no avail. Attorney Andrea L. Price Esq has not filed any lien's or judgments against Plaintiff for any outstanding Attorney fees or any other fees, as Plaintiff is not in debt to the defendant for anything. Defendant Andrea L. Price is simply ignoring her Professional, ethical and legal obligation to Surrender the Plaintiff's entire case file to him.

This Request for a order follows.

1. Plaintiff is Presently attempting to file a Post-Conviction Relief Application & Research his other legal options to Challenge his Conviction & Sentence. All Which are impossible Without his entire file.

CONCLUSION

For the foregoing reason Plaintiff's motion should be granted

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DATE: 11-9-2016

NOV 15 2016

S. Bernard Dewberry

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
County of Spartanburg

) IN THE SUPREME COURT OF SOUTH CAROLINA
)
) Indictment No 2015-GS-420-3593
)

Bernard Dewberry,
Plaintiff,

AFFIDAVIT

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PROOF OF SERVICE SC Court of Appeals

v.
Attorney Andrea L. Price, Esq.,
Defendant.

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S.C. SUPREME COURT

I, Bernard Dewberry Plaintiff Certify that I have this day Served Plaintiff's Motion and Notice of Motion upon defendant to Surrender entire Case file; upon the Supreme Court of South Carolina; by depositing one(1) original & one(1) copy of the same in the U.S. Mail by & through the McCormick Correctional Institutions legal Mail system:

THE FOLLOWING PARTY WAS SERVED AT THE BELOW ADDRESS

1). The Supreme Court of South Carolina
Hon Daniel E. Shearouse, Clerk
P. O. Box 11330
Columbia, SC 29211

2). Andrea L. Price, Esq
Public Defenders office, Suite 3000
366 N. Church St
Spartanburg, SC 29303

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 9th DAY OF November 2016

NOTARY: [Signature] Michael Camano

EXP: July 09, 2026

S/Bernard Dewberry
Bernard Dewberry #278949
mcc F-4A 252
386 Redemption way
McCormick, SC 29649

Bernard Dewberry #278949

MCCI F-4A252
386 Redemption Way
McCormick, SC 29899

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SC Court of Appeals

Nov. 9 2016

Andrea L. Price Esq,
Public Defender
366 N. Church St, Suite 3000
Spartanburg, SC 29303

RE: Bernard Dewberry v. Att. Andrea L. Price

Dear Hon. Shearouse:

Enclosed please find Plaintiff's Notice of Motion and Motion to Surrender entire Case file and a Proof of Service. Also enclosed is a Pre-Paid Self-Address envelope for the return of extra copy of the above. Please Clock Stamp and file copy.

Thank you in advance.

S/Bernard Dewberry

PS: This Motion will go Subjudice in five (5) Working day if no response.

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S.C. SUPREME COURT

Bernard Dewberry #2789009

F-4252A

McCormick Correctional Institute
386 Redemption Way
McCormick, SC 29899

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NOV 15 2016

S.C. SUPREME COURT

The Supreme Court of South Carolina
Hon Daniel E. Shearouse, Clerk
P.O. Box 11330 Columbia SC 29211