

BEFORE THE SUPREME COURT OF SOUTH CAROLINA
Appellate Case No. 2015-000941

APPEAL from RICHLAND COUNTY Court of Common Pleas
Alison Renée Lee, Circuit Court Judge
Circuit Court Case No. 2013-CP-40-03522

City of Columbia, South Carolina,

Respondent,

Marie-Thérèse Assa'ad-Faltas, MD, MPH,


Appellant.

**Appellant's First Contingent Motion to Appoint Counsel for the purpose of rehearing
Or to allow her to file her own Petition for Rehearing
In case the decision is adverse to her but current counsel does not wish to seek rehearing
AND to toll the rehearing time until this motion is decided.**

This Court barred Appellant from filing more motions *to relieve counsel in this case* but did not bar her from filing a motion to appoint counsel *in this case or any other*. Appellant knows she deserves to win this appeal; but, as a physician, she is ingrained with foreseeing, and preparing for, all adverse contingencies. She knows that, in the event, God forbid, an adverse decision issues, her current counsel may not be available to timely seek rehearing. Therefore, this contingency motion is filed ahead of time to have it ready for the Court's consideration if and when need arises.

Petitioner certifies to the Court that she tried to discuss rehearing contingencies with her current counsel but he made himself unavailable to her. WHEREFORE, in the event of a decision of the merits of this appeal adverse to Appellant, the time of rehearing should be tolled until this Court decides to allow Appellant to file her own petition for rehearing or to appoint for her counsel, in addition to her current counsel, so that the former may file the petition the latter might not.

Submitted on 21 February 2017 and served by personal delivery of a copy thereof to the City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina, 29201, and on Mr. Dudek at his office at 1331 Lady Street, Columbia, SC 29201, all God so willing.


Marie-Thérèse Assa'ad-Faltas, MD, MPH, Appellant
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S.C. SUPREME COURT