

BEFORE THE SUPREME COURT OF SOUTH CAROLINA
Appellate Case No. 2016-002541
Appeal from RICHLAND COUNTY of Common Pleas

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SEP 01 2017

S.C. SUPREME COURT

In the Matter of Marie-There'se Assa'ad-Faltas, MD, MPH

Petitioner

MOTION TO BE RELIEVED AS COUNSEL FOR PETITIONER

This is a motion for the counsel of record in this case be relieved of his duty to represent the Appellant in this appeal. There are three reasons for this request.

Initially, the client requested that I file this Motion because counsel refused to include any criticism of Mr. Mason in the Motion for Reconsideration of the Court's ruling in the appeal; she then withdrew that request.

The first reason is counsel believes that for an attorney to include such criticism in the case to recover expenses incurred in several cases in which Dr. Faltas represented herself would be unethical, unnecessary, not relevant, and un-Christian.

The second reason is that counsel has a pending frivolous ethics complaint filed by Mr. Mason to the Office of Disciplinary Counsel which falsely alleges that counsel has encouraged Dr. Faltas to attack his character and otherwise harass him in legal proceedings. The truth is that counsel has advised Dr. Faltas more than two dozen times that she should ignore Mr. Mason, no matter what comments he makes to her.

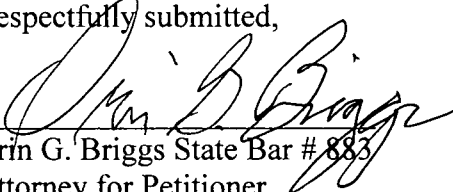
The third reason counsel refused to include such criticism is that counsel believes the motion he proposed to file in the assault case (2015-000941) had a much better chance of getting favorable consideration by this court than the one he was forced to file by the client. The client refused to allow me to quote any of the client's misconduct in court and her constant disagreement with her counsel, believing that she knows more law than any attorney she has hired or been assigned.

Of course, counsel does not expect this court to respond to the argument presented in the third reason above. Counsel has also attached several emails which show how counsel attempted to persuade the client to file a more professional motion and how the client continues to criticize her counsel and frankly lies about things she has imagined about the counsel.

Counsel would respectfully request that the court either appoint other counsel for Petitioner or in the alternative make a one-time exception to the prohibition that she cannot represent herself in this civil matter, and allow her to represent herself in this one case.

Counsel respectfully requests this Court to relieve him of any further obligation to represent Dr. Faltas in the above cited case before this court. Of course, if counsel is relieved, he would not be eligible to receive any compensation which had previously been agreed to by counsel and the client in this case if she is awarded some expenses.

Respectfully submitted,



Orin G. Briggs State Bar # 883

Attorney for Petitioner

101 Bennock Mill Ct.

Lexington, SC 29072

803/957-4383

e-m: ogb-atty@sc.rr.com

August 31, 2017

From: Orin Briggs
Sent: Sunday, August 13, 2017 9:59 PM
To: Marie Faltas
Subject: comments on Appellant's motion

First, I will not sign any pleading on the assault charge that has any reference to Mason.
Second, you must remove the " " around Judge Solomon; it implies he does not deserve the title.
Third, no where in the motion do you deny the "assault."
Fourth, I believe all the quotes from other cases are not relevant and if some are left in the should be attachments with clear titles and dates before the quotes.
Fifth, the paragraph before "I. Religiously: . . ." is silly.
Sixth, all the religion is irrelevant; all of this should be removed!
Seventh, the attach on the Police department is wasted words.
Eighth, "i. CAPITAL . . . IS APPROPRIATE AND SHOULD BE UP-FRONT.
Nineth, even the After-discovered evidence should be an attachment; the court is not going to read 26 pages of rambling accusations that have nothing to do with the facts in the assault case.
Tenth, in statements like "The City LIED about Crouch's criminal record . . . should be preceded with "Dr. Faltas asserts:" I have no personal knowledge about most of these facts.
Eleventh, again, the case Lupton handled should be an attachment and clearly identified before quoting from it!!!!
Twelfth, two pages later, "not only had Crouch received . . . should be preceded by: Dr. Faltas believes:
Thirteenth, on next page the reference to a trial transcript should be an attachment and clearly identified as to which case it is!!!!
Fourteenth, all other quotes from cases should be attachments and clearly identified; actually, I believe most of them are not relevant to the issue of assault.

I will be available to meet you after lunch for signing both pleadings. Orin

Sent from Mail for Windows 10

From: Marie Faltas
Sent: Saturday, August 26, 2017 8:48 PM
To: Orin Briggs; Marie Assa'ad-Faltas; Camellia Briggs
Subject: Re: My proposed motion to be relieved as counsel in money case

If you file this motion, I shall have every right to file a grievance against you with ODC. Maybe then you will respect me as you respect Mason.

The grounds for my grievance will be:

(1) you disclose our attorney-client conversations willy-nilly, including to Mason himself. In fact, you used to run after Mason to talk to him and divulge attorney-client privileged conversations to him until HE filed his first grievance against you;

(2) you wanted to force me to admit guilt of assault even though you know I am innocent;

(3) you wanted me to agree in writing to NOT name you in future PCRs even though you were the worst lawyer ever in those cases; **specifically, instead of getting me out on bond, YOU AGREED TO LENGTHEN MY SENTENCE by agreeing to revoke my good-time and work credits.**

Has anyone ever heard of a lawyer other than Orin Briggs who says to the judge, Okay, give my client more time in jail?

I shall, God willing, draft a motion for the Court to allow me to represent myself in the money case. PERIOD.

From: Orin Briggs <ogb-atty@sc.rr.com>
Sent: Saturday, August 26, 2017 2:09 PM
To: Marie Faltas
Subject: My proposed motion to be relieved as counsel in money case

Sent from [Mail](#) for Windows 10

From: Orin Briggs
Sent: Monday, August 14, 2017 8:15 PM
To: Marie Faltas
Subject: your hatred of mason

If you want to violate every Biblical principle about not judging others, turning the other cheek, and vengeance is mine sayeth the Lord then prepare an affidavit to be attached to the motion. I will not use my words to criticize Manson.
Sent from Mail for Windows 10

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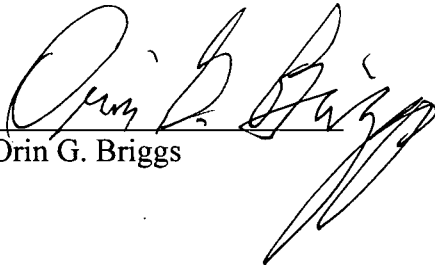
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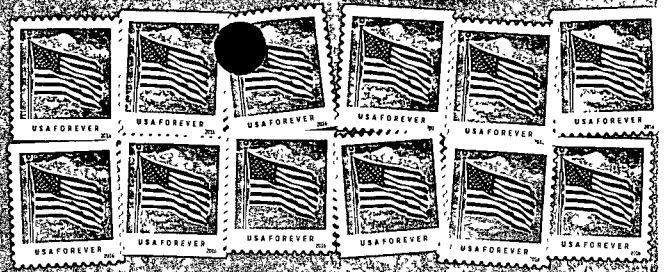
CERTIFICATE OF SERVICE

Counsel for Petitioner certifies that he mailed a copy of his Motion to be Relieved as Counsel for the Petitioner to her at her Post Office Box at the following address:

Marie Faltas, MD, MPH
P. O. Box 9115
Columbia, SC 29290


Orin G. Briggs

September 1, 2017



Orin G Briggs
Briggs Law Firm
101 Bennock Mill Court
Lexington, SC 29072

S. C. Supreme Court
Filing Clerk
P. O. Box 11330
Columbia, SC 29211

