

STATE OF SOUTH CAROLINA IN THE  
COURT OF APPEALS

RECEIVED  
MAY 09 2018  
SC Court of Appeals

GEORGE DOW  
RESPONDENT

APPELLANT CASE  
NO. 2018-00778

VS

RANSOM COARD JR, PATRICIA A. COARD-SEABROOKS,  
BETTY FRIERSON, JAMES BAXTER, DIANN C. WILLIAMS  
JAMES COARD, DAVID HOARD, JULIUS COARD JR.,  
STEVE COARD, VICTORIA COARD, QUEEN ELIZABETH BOYD,  
LAWRENCE COARD AND JOHN DOE, A FICTICIOUS PERSON,  
REPRESENTING AS A CLASS ALL UNKNOWN HEIRS OF ALBERT  
COARD, LUCILLE COARD, RANSOM COARD, JULIUS COARD,  
WILLIE COARD, QUEEN ELIZABETH COARD(IF DECEASED),  
WILHEMENER MARION, WILHEMENER COARD MICKENS, JAMES  
BAXTER(IF DECEASED) AND STEVE COARD AND ALL OTHER  
UNKNOWN PERSONS CLAIMING ANY RIGHT, TITLE, ESTATE,  
INTEREST OR LIEN IN OR UPON THE REAL ESTATE DESCRIBED  
IN THE COMPLAINT HEREIN, AND RICHARD ROE, A FICTITIOUS  
PERSON REPRESENTING AS A CLASS ALL PERSON SUFFERING  
UNDER LEGAL DISABILITY AND CLAIMING AN INTEREST IN  
THE PROPERTY HEREIN DESCRIBED,  
DEFENDENTS

OF WHOM RANSOM JR., AND PATRICIA A. COARD-SEABROOKS  
ARE THE APPELLANTS.

UNDER RULE 201, THE Court of Common Pleas, Case 2012-CP-14-145  
Non Jury Property Title order signed by Special Referee on March 23, 2018,  
Order file and entered in Court on March 27, 2018.

Appeal from Clarendon County Court of Common Pleas:

Special Referee  
William H. Johnson

**Order/Decree**  
**Case No. 2012-CP-14-145 Non Jury property Title.**

**APPELLANTS RESPONSE TO ATTORNEY MOTION TO BE  
RELIEVED  
AS ATTORNEY FOR APPELLANTS.**

**THE COURT SHOULD PLEASE TAKE NOTICE, that the undersigned** attorney of record completed blindsided the Appellants with motion to be relieved as Counsel of Record. The Appellant Ransom Coard Jr., paid attorney for the service rendered there is no outstanding fees owed to the attorney of record. The appellants gave notice to the attorney of record the following day of receiving the order from the Court of Common Pleas, that the attorney of record mailed to the appellants. Appellant Coard-Seabrooks received order from attorney of record on April 4, 2018 and called the Attorney on April 5, 2018, that the appellants wanted to appeal the case.

From April 5th to April 24th, both appellants made numerous phone calls and left messages for the attorney and left messages with his office assistant for the attorney of record to return the calls of the appellants in reference to the Respondent and Appellants case. The attorney of record did return appellant call until April 24, 2018. Wherein the appellants Coard-Seabrooks informed the attorney of record after not hearing from the him. The appellant had filed papers to make sure the appellant did not lose the right to appeal the case.

The attorney of record has not <sup>had</sup> any discussion or opinion as to the direction of the appeal and the possible outcome of the appeal with either appellants. The appellants respect the rights of an attorney right to withdraw from a case. This attorney of record mislead the appellants on April 24, 2018, that attorney could download the documents, appellant Coard-Seabrooks filed and make the necessary corrections if needed. Appellant Coard-Seabrooks explained to Attorney of record that after not hearing from him and April 27, 2018 was only three days away, the appellant took actions to protect the appellant right to appeal the errors on the case. Two and three phone calls were being made per day to the attorney of record and not one phone call was return until April 24, 2018, by Attorney Carter the attorney. As of this day the attorney of record has not had a verbal communication of any kind with the appellants on the direction of the case or his withdrawal from the case.

The actions of the attorney of records in this manner, bring into question his representation of the appellants in this matter before this or court and lower court. Since there has been no discussions of opinion or the direction of the appeal and outcome of the appeal and to further mislead appellant Coard-Seabrooks as to his representing the appellants. On May 2, 2018, appellant Coard-Seabrooks dial the fax number to fax documents the office assistant answered the fax number, wherein appellant asked if the number was the fax number and was told Attorney Carter was

on main line and call rollover to the fax number. After appellants did the fax for proof of service and call back to verify the fax, the appellants were not informed of the motion by the attorney of record.

The attorney of record's conduct in this matter is unethical and puts the appellants at a disadvantage at this moment and time in preparing for the notice of appeal. An attorney's oath is to be truthful, this attorney has not been truthful to this court for the grounds for his motion, the attorney has not had any discussion on this case before the court.

Because of the attorney of record's actions in this matter, the appellants must be granted time to find another attorney to represent appellants in this appeal action.



Patricia A. Coard-Seabrooks  
Appellant and for  
Ransom Coard Jr., Appellant

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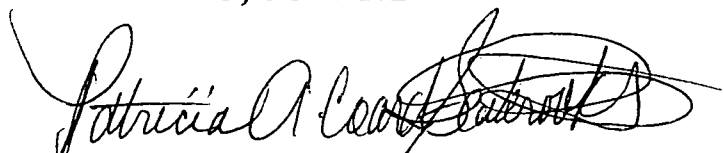
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**CERTIFICATE OF MAILING APPELLANTS RESPONSE TO  
ATTORNEY  
MOTION TO BE RELIEVED AS ATTORNEY OF RECORD  
FOR THE  
APPELLANTS**

**ELEAZER CARTER  
105 S. BROOKS STREET  
MANNING, SOUTH CAROLINA 29102**

**COUNSEL FOR GEORGE DOW RESPONDENT/APPELLEE  
MARION S. RIGGS  
27 W. BOYCE STREET  
MANNING, SC 29102**

**CLERK OF COURT OF COMMON PLEAS  
CLARENDON COUNTY  
102 S. MILL STREET  
MANNING, SC 29102**



Patricia A. Coard-Seabrooks and for  
Ransom Coard Jr.  
Appellants

*pac may 7, 2018*

Certificate of Mailing that on this date the 18<sup>th</sup> May 2018, mail to these document/pleadings to Counsel for Respondent, Clerk of Court of Common Pleas for Clarendon County South Carolina with the proper postage attached thereto the amendment to notice of appeals and response to Attorney request to be remove as attorney of record.