

November 12, 2019

State of South Carolina

County of Colleton

Patricia E. Campbell, plaintiff

Vs.

Joanne Ahearn and

Robert J. Plum, defendants

Court of Appeals

Motion and affidavit to proceed in Forma Pauperis

File No. 2019 CP 1500285

RECEIVED
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SC Court of Appeals

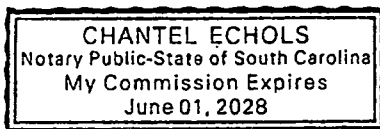
I Joanne Ahearn and I Robert J. Plum being duly sworn, state that we are defendants and we do not have
The funds available to pay the cost of filing and services in the present matter. We hereby request that
This appeal be filed and service made without cost.

Sworn to and Subscribed before me
this 12 day of NOVEMBER, 2019

Chanel Echols
Notary Public for South Carolina

My Commission expires 06/01/2028

)
)
) Joanne Ahearn
) Robert J. Plum
) Signature of DEFENDANTS or
) Person Filing Complaint on Behalf of
) DEFENDANTS



November 12, 2019

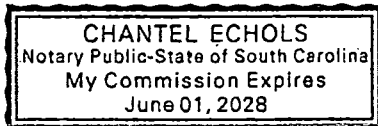
With all due respect I Robert J. Plum being duly sworn that I am the defendant in reference to Docket Number 2019 CP 1500285 and I have personally served attorney Benjamin Sapp at his office located at 125 S. Jefferies Blvd., Walterboro South Carolina, a notice of appeal on the 5th day November, 2019 at 2:06 p.m.

Sworn to and Subscribed before me
this 12 day of NOVEMBER, 2 019

afn
Notary Public for South Carolina

My Commission expires 06/01/2028

Robert J. Plum
Signature of DEFENDANT or
Person Filing Complaint on Behalf of
DEFENDANTS



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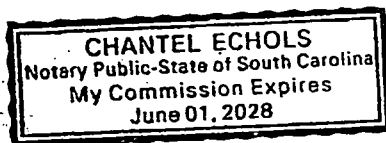
With all due respect I Robert J. Plum being duly sworn that I am the defendant in reference to Dockett Number 2019 CP 1500285 and I have personally served attorney Benjamin Sapp at his office located at 125 S. Jefferies Blvd., Walterboro South Carolina, 29488 the order of judgement on the 12th day of November, 2019. The same order of judgement was mailed to the Court of Appeals, P.O. Box 11629, Columbia South Carolina on the 12th day of November, 2019 and also mailed to the Circuit Court of Common pleas, 101 Hampton St., Walterboro South Carolina, 29488 on the 12th day of November, 2019.

Sworn to and Subscribed before me
this 12 day of NOVEMBER, 2019

Ch
Notary Public for South Carolina

My Commission expires 06/01/2028

Robert J. Plum
Signature of DEFENDANTS or
Person Filing Complaint on Behalf of
DEFENDANTS



11/5/2019

Name of court: Court of common pleas

Special referee: Kenneth A. Campbell Jr.

County: Colleton

Docket Number: 2019-CP-15-00285

Date of order: October 7, 2019

Names of parties taking the appeal: Joanne Ahearn

Address: 504 Forest Circle Apt. 123, Walterboro, South Carolina, 29488

Phone Number: 843-603-0566

Robert J. Plum

Address: 504 Forest Circle Apt. 123, Walterboro, South Carolina, 29488

Phone Number: 386-416-9561

The names, mailing addresses, and telephone numbers of all attorneys of record and the names of the party or parties represented by each:

Benjamin Cullifer Pickens Sapp, Attorney Representing Patricia E. Campbell

Address: 125 S. Jefferies Blvd., P.O. Box 258 Walterboro, South Carolina, 29488

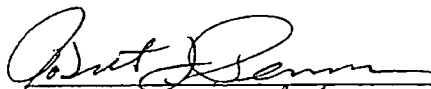
Phone Number: 843-549-5923

Patricia E. Campbell

Address: 331 Turner Lane, Round O, South Carolina, 24974

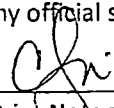
Phone Number: 843-599-0606

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Robert J. Plum 11/5/2019

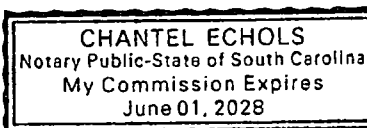

Joanne Ahearn 11/5/2019

Witness my official seal this 5 day of NOV., 2019.


(Type or Print Notary's Name)

Notary Public of South Carolina

My Commission Expires: 06/01/28



ROBERT J. FLUM
504 FOREST CIRCLE APT 123
WALTERBORO, SC 29488

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PO BOX 11629
COLUMBIA, SC 29211

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