

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

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NOV 13 2019
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)
[Signature])
Notary Public for South Carolina)
My Commission expires 06/01/2028)

[Signature]
[Signature]
Signature of DEFENDANTS or
Person Filing Complaint on Behalf of
DEFENDANTS

CHANTEL ECHOLS
Notary Public-State of South Carolina
My Commission Expires
June 01, 2028

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

CHANTEL ECHOLS
Notary Public-State of South Carolina
My Commission Expires
June 01, 2028

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SC Court of Appeals

November 12, 2019

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

CHANTEL ECHOLS
Notary Public-State of South Carolina
My Commission Expires
June 01, 2028

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

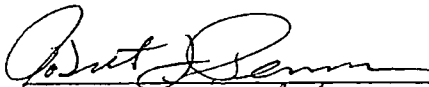
Phone Number: 843-549-5923


Patricia E. Campbell

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

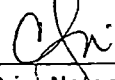
Phone Number: 843-599-0606

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NOV 13 2019
SC Court of Appeals


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

CHANTEL ECHOLS
Notary Public-State of South Carolina
My Commission Expires
June 01, 2028

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

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