

93493

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
IN THE MATTER OF :)
)
John Terrence Mobley, Esquire)
)
David J. Miller , Esquire)

IN THE COURT OF APPEALS

RECEIVED

NOV. 03 2020

CASE NUMBER 2020-001187

SC Court of Appeals

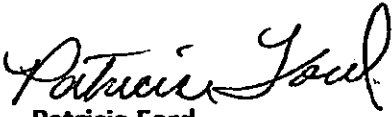
MOTION TO DISMISS ATTORNEYS

MOVANT: Patricia Ford the undersigned request that the court order that attorneys be dismiss as attorney for Patricia Ford v Tar Heel Capital . and that the lawsuit continue that the attorneys file.

MOVANT makes this Motion for the following reasons:

1. Attorneys were negligent in investigating statement of "poor lighting " and requesting workorders may by Wendy's Manager who wrote the accident report because plaintiff left hand was broken could not write. Manger stated on the report poor lighting.
2. Attorneys mandated that plaintiff no contact their office and refused to represent her further with taking Wendy's Tar hell Capital to court.
3. Attorneys, per the court. Have not filed correct documentation.
4. Attorneys have not provided plaintiff with all legal documents to include mediation transcript that I did with Wendy's John Michael Montgomery Esquire.
5. During mediation, attorneys made unprofessional comments. ie. "We know where this is going".
6. Attorneys continued with mediation, putting plaintiff under duress after she state that she was on medication and not well.

October 10, 2020



Patricia Ford
1216 Congaree Road
Hopkins, SC 29061
803 414-4940

- cc:
- David J Miller, Esquire
 - John Terrence Mobley, Esquire
 - Rachel Moore Hyutchens, Esquire
 - Rebecca Lafitte, Esquire
 - Vordman Carlisle Traywick, III, Esquire

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM RICHARD COUNTY
Court of Common Pleas

Case No. docket 2020-001187

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SC Court of Appeals

Patricia Ford,
Plaintiff,

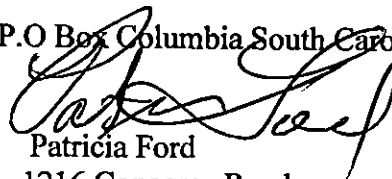
v.

Tarheel Capital/Wendy's
Defendant,

PROOF OF SERVICE
Motion to Dismiss Attorney

I certify that I have served the Notice of Motion to Dismiss Attorneys , John M. Montgomery , Esquire and Staff by depositing a copy of it in the United States Mail, postage prepaid, Certified mail receipt # 7019-2280-0000-4260-1277 on October 19,2020 addressed to attorney office ,

John M. Montgomery , Esquire and Staff P.O Box Columbia South Carolina 29211



Patricia Ford
1216 Congaree Road
Hopkins SC 29061
(803) 414-4960
Pro se

Appellant. October 30, 2020

Patricia Ford
1316 Congress Rd
Hopkint SC 29061

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NOV 08 2020
SC Court of Appeals

South Carolina Court of Appeals
1220 Senate St
Columbia SC 29201