

93547

STATE OF SOUTH CAROLINA)
 COUNTY OF RICHLAND)
)
 Patricia Ford and Cleveland Ford)
)
 Plaintiffs)
 v.)
)
 Tar Heel Capital Corporation)
 d/b/a Wendy's)
 Defendants)

IN THE COURT OF APPEAL
 FIFTH JUDICIAL CIRCUIT
 Appellate Case No. 2020-0011187
 Appellate Court

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 SC Court of Appeals

PETITION FOR REHEARING

Now come Plaintiffs Patricia Ford and Cleveland Ford asking the court to grant a rehearing in the above styled case. Plaintiffs feel they were deprived of their day in court and assert the following facts in support of this position:

1. Incident occurred on November 11, 2017 at Wendy's Restaurant #74 Garners Ferry Road Columbia; South Carolina county of Richland time Approximate 6:33 PM
2. Attorneys were negligent in investigating statement of "poor lighting" and failed to request work orders made by Wendy's Manager Maria Shannon who wrote the accident report.
3. Plaintiff Patricia Ford's left hand was broken, impeding her ability to write. Manager completed an incident report on Mrs. Ford's behalf and listed poor lighting as a primary reason for the incident and subsequent injuries Mrs. Ford suffered.
4. Attorney has mandated that plaintiff no longer contact their office and has refused to represent her further in taking the matter to trial
5. Attorneys, per the court, have not filed proper documentation to withdraw from representation
6. Attorneys have failed to provide plaintiffs with all legal documents to include mediation transcript between John Michael Montgomery, Esq., plaintiffs, and plaintiff's former counsel
7. During mediation, attorney made unprofessional comments such as: "We know where this is going." Implying that plaintiff was engaged in misuse of the court's resources or some other frivolity
8. Attorneys continued with mediation against plaintiff's wishes. Plaintiff was offered settlement as an ultimatum. Plaintiff stated that she was on medication and not well. Plaintiff feels she was coerced into accepting the settlement offer as the attorney characterized the offer as "the best [plaintiff was] going to get."



Patricia Ford
1216 Congaree Road
Hopkins SC 29061
803 414-4960
patroberts1216@gmail.com

cc:

Mr. John Michael Montgomery, Esq
PO Box 114499
Columbia SC 29211

Ms. Rachel Moore Hutchens, Esquire
PO Box 114499
Columbia SC 29211

Ms. Rebecca Laffitte, Esquire
PO Box 114499
Columbia SC 29211

Mr. Vordman Carlisle Traywick, III, Esquire
PO Box 114499
Columbia SC 29211

**FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

George E. Brown, Circuit Court Judge

Case No. 2020-0011187

Tar Heel Capital/Wendy's,

Respondent,

v.

Patricia Ford and Cleveland Ford,

Appellant

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PROOF OF SERVICE

SC Court of Appeals

REHEARING AND
MOTION DISMISS
OF ATTORNEYS

I certify that I have served the Notice of Appeal on Tar Heel Capital/Wendy's by depositing a copy of it in the United States Mail, postage prepaid, on October 19, 2020, addressed to the John Michael Montgomery Esquire, and Staff. Post Office Box 114499, Columbia, South Carolina 29211 [by personally mailing through United States Postal Service at above address on October 19, 2020 with tracking

October 19, 2020

s/ Patricia Ford
Patricia Ford
1216 Congaree Road
Hopkins, South Carolina 29061
(803) 414-4960
Pro se

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

Patricia Ford,
Plaintiff,

v.

Tarheel Capital/Wendy's
Defendant,

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SC Court of Appeals

PROOF OF SERVICE
REHEARING

I certify that I have served the Notice of Rehearing , John Michael Montgomery, Esquire 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 P.O Box 11449 Columbia South 29211

Appellant

Patricia Ford
1216 Congaree Road
Hopkins SC 29061
803 414-4960

**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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Plaintiff,

v.

Tarheel Capital/Wendy's
Defendant,

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I certify that I have served the Notice of Rehearing ,Ms. Rachel Moore Hutchens, Esquire 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 P.O Box 11449 Columbia South 29211

Appellant

Patricia Ford
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Hopkins SC 29061
803 414-4960

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

Patricia Ford,
Plaintiff,

v.

Tarheel Capital/Wendy's
Defendant,

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I certify that I have served the Notice of Rehearing ,Ms. Rebecca Laffitte, Esquire 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 P.O Box 11449 Columbia South 29211

Appellant

Patricia Ford
1216 Congaree Road
Hopkins SC 29061
803 414-4960

FORM 7
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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

Patricia Ford,
Plaintiff,

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Tarheel Capital/Wendy's
Defendant,

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REHEARING

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Appellant

Patricia Ford
1216 Congaree Road
Hopkins SC 29061
803 414-4960



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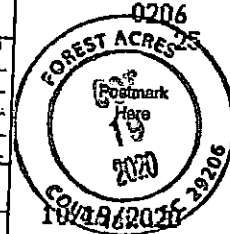
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SC Court of Appeals

PS Form 3811, July 2015 PSN 7530-02-000-9053

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A. Signature Agent Addressee

B. Received by (Printed Name) JAMVAN MORRIS C. Date of Delivery 10/22

D. Is delivery address different from item 1? Yes No
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Patricia Self
1216 Congaree Rd
Columbia SC 29094

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SC Court of Appeals

SCCA
V. Claire Allen Chief Deputy (def)
P.O. Box 11629
1220 Senate Street
Columbia SC 29094