

STATE OF SOUTH CAROLINA )

IN THE COURT OF APPEALS

COUNTY OF RICHLAND )

IN THE MATTER OF: )

CASE NUMBER 2020-001187

John Terrence Mobley, Esquire )

David J. Miller, Esquire )

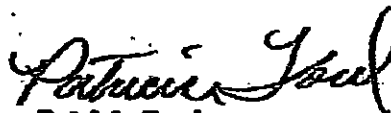
MOTION TO DISMISS ATTORNEYS

**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

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**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.

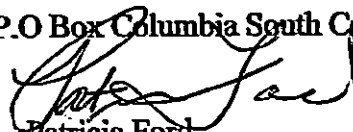
Tarheel Capital/Wendy's  
Defendant,

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**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

**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 MOTION TO DISMISS ATTORNEYS, John Terrence Mobley, Esquire and David Miller, 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 Mr. Vordman Carlisle Traywick, III, Esquire 114499 Columbia South Carolina 29211

October 19, 2020

Appellant

Patricia Ford  
1216 Congaree Road  
Hopkins SC 29061

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

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

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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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**PROOF OF SERVICE**

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October 19, 2020

Appellant

Patricia Ford  
1216 Congaree Road  
Hopkins SC 29061

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

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

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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**

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October 19, 2020

Patricia Ford  
1216 Congaree Road  
Hopkins SC 29061  
for Appellant



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Columbia, SC 29211

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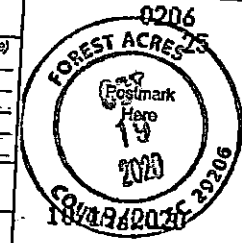
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
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<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.55

Total Postage and Fees \$6.95

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P.O. Box 11449  
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PS Form 3811, April 2015 PSN 7530-02-000-9037 See Reverse for Instructions



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SENDER: COMPLETE THIS SECTION.

1. Article Addressed to:

John M Montgomery  
Staff  
P.O. Box 11449  
Columbia, SC 29211

2. Article Number (over \$500)

7019 2280 0000 4260 1277

PS Form 3811, July 2016 PSN 7530-02-000-9038

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<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™ Restricted Delivery
<input type="checkbox"/> In Delivery Restricted Delivery	
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4. COMPLETE THIS SECTION ON DELIVERY

A. Signature: *[Signature]*

B. Received by (Printed Name): *John M Montgomery*

C. Date of Delivery: *10/22*

D. Is delivery address different from item 1?  Yes  No

Palmira Leaf  
1216 Congaree Rd  
Columbia SC 29009

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SCCA  
V. Clarence Allen Chief Deputy (clal)  
P.O. Box 11629  
1220 Senate Street  
Columbia SC 29009