

**CITY OF COLUMBIA, Respondent**

v.

**Defendant/Appellant's URGENT Motion to Relieve Dan Addison**

**Marie Assa'ad-Faltas, MD, MPH, Appellant**

Defendant/Appellant Marie Assa'ad-Faltas, MD, MPH ("Dr. Assa'ad-Faltas" or "Dr. Faltas") hereby *timely* and urgently moves this Court to relieve Dan Addison as he has been *intentionally* sabotaging her case below, losing it on purpose, and **has refused to either move to be relieved by this Court or to respond to this Court's 25 April 2022 deficiency letter, the response to which is due, God willing, on Monday 4 April 2022.** Instead of filing the required formal responses, Dan Addison reported talking *ex parte* to Jenny Kitchens and to V. Claire Allen and reported being instructed by them on unlikely procedures. Additionally, Dan Addison sought to be relieved by *SC Circuit Judge Brown* **after the latter's jurisdiction over the case ended by the filing of this appeal and after it was explained to Dan Addison that he needs to move to be relieved by this Court, which he refused to do without explanation.**

SC Circuit Judge Brown no longer has jurisdiction *over this case* or the case below since it is now on appeal. Therefore, Dr. Assa'ad-Faltas is allowed by SC's Supreme Court's 27 September 2017 ORDER to move to relieve counsel so long as she had good reason to do so. She had *excellent* reason to do so in that Dan Addison is neglecting to respond to the time-sensitive deficiency letter and thus risks getting this appeal totally dismissed.

**Sincerely submitted and served by e-mail and by hand-delivery on Mr. Marshall James, counsel for the City of Columbia, and on Dan Addison by e-mail and U.S. mail, all on 1 April 2022, all God so willing.**



s/Marie Assa'ad-Faltas, MD, MPH, Defendant/Appellant *pro se*

P.O. Box 9115, Columbia, SC 29209

Phone: (803) 783-4536

Cell: (330) 232-4164

e-mail: [Marie.Faltas@hotmail.com](mailto:Marie.Faltas@hotmail.com)

and [MarieAssaadFaltas@GMail.com](mailto:MarieAssaadFaltas@GMail.com)

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RE: There is NO objective evidence to refute that you are all conspiring against me, including Mr. Addison's PLAYING DUMB about being my lawyer despite NOT being relieved YET.

Dan Addison <DAddison@hallboothsmith.com>

Fri 2022-03-25 11:43 AM

To: Marie Faltas <Marie\_Faltas@hotmail.com>; Timothy L. Griffith <tgriffith@tgriffith.com>; Robert Michael Dudek <rdudek@sccid.sc.gov>

Cc: Marie Assa'ad-Faltas <marieassaadfaltas@gmail.com>; James, Marshall S <Marshall.James@columbiasc.gov>

Dr. Faltas, I received these same letters this morning, and have contacted the Court of Appeals regarding the matter, as well as Judge Brown's clerk regarding the pending Motion to be Relieved before Judge Brown. There will be a virtual courtroom hearing with Judge Brown. (I was just now informed of this, notice will be coming out shortly from the court, to you) this next Thursday for my Motion. The Clerk for the Ct App, Ms. Kitchens, has indicated that should my Motion be granted by Judge Brown, there is no further action needed by me, and the Court will remove me from the case at the Court of Appeals. You will be able to address the issues of representation by Appellate Defense at that time.

I only include the others in this email per your involvement of them in this discussion. I remain steadfast in the position that my responsibilities have ended per my appointment under rule 608. The Motion is to deal with that aspect of Judge Brown's order which requires me to be a conduit for filings with the Court.

### Dan Addison

Attorney at Law | Hall Booth, Smith, P.C.



O: 843.720.3460

111 Coleman Boulevard, Suite 301

D: 843.720.3485

Mount Pleasant, SC 29464

hallboothsmith.com



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From: Marie Faltas <Marie\_Faltas@hotmail.com>

Sent: Friday, March 25, 2022 11:33 AM

To: Dan Addison <DAddison@hallboothsmith.com>; Timothy L. Griffith <tgriffith@tgriffith.com>; Saxon, Jessica <jsaxon@sccid.sc.gov>; Robert Michael Dudek <rdudek@sccid.sc.gov>

Cc: Marie Assa'ad-Faltas <marieassaadfaltas@gmail.com>; tex.davis@dss.sc.gov; James, Marshall S <Marshall.James@columbiasc.gov>

Subject: There is NO objective evidence to refute that you are all conspiring against me, including Mr. Addison's PLAYING DUMB about being my lawyer despite NOT being relieved YET.

Repeating the subject line: **There is NO objective evidence to refute that you are all conspiring against me, including Mr. Addison's PLAYING DUMB about being my lawyer despite NOT being relieved yet.**

**Attached are two letters entered *today* on C-Track. The deficiency letter has a 10-day deadline and says Mr. Addison is the lawyer *unless and until* relieved.**

**What on earth is Mr. Addison waiting for to *timely* file to be relieved *at the Court of Appeals*? Mr. Addison's motion should indicate that Appellate Defense should be appointed instead because that is the procedure.**

**FOLLOW UP, you all.**

RE: I see SC Circuit Judge Brown is scheduled for the 5th Cir on 31 March 2022 "am" BUT I have no idea what time and I see NO NOTICE on any of my cases.

Dan Addison <DAddison@hallboothsmith.com>

Wed 2022-03-30 3:16 PM

To: Marie Faltas <marie\_faltas@hotmail.com>

Cc: Marie Assa'ad-Faltas <marieassaadfaltas@gmail.com>; Saxon, Jessica <jsaxon@sccid.sc.gov>; James, Marshall S. <Marshall.James@columbiasc.gov>; Robert Michael Dudek <rdudek@sccid.sc.gov>

Dr. Faltas – I just spoke with Judge Brown's clerk and clarified the link for the Webex procedure. The matter is still set for tomorrow at 9 am. You will receive a link invite around 8 am to 8:30 in the morning to allow you to join the Webex meeting Motion hearing. You will not receive anything else from the court before that time. As required, I have informed you of this motion hearing time as scheduled. Your appearance has been approved by Judge Brown, and he will send you the link as indicated.

### Dan Addison

Attorney at Law | Hall Booth Smith, P.C.



O: 843.720.3460

111 Coleman Boulevard, Suite 301

D: 843.720.3485

Mount Pleasant, SC 29464

hallboothsmith.com



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From: Marie Faltas <marie\_faltas@hotmail.com>

Sent: Wednesday, March 30, 2022 3:04 PM

To: Dan Addison <DAddison@hallboothsmith.com>

Cc: Marie Assa'ad-Faltas <marieassaadfaltas@gmail.com>; Saxon, Jessica <jsaxon@sccid.sc.gov>; James, Marshall S <Marshall.James@columbiasc.gov>; Robert Michael Dudek <rdudek@sccid.sc.gov>; tex.davis@dss.sc.gov; Young, Herverly <hyoung@sccid.sc.gov>; hryan@sccid.sc.gov; Timothy L. Griffith <tgriffith@tlgriffith.com>; dzelenka@scag.gov; wblitch@scag.gov; cwaters@scag.gov; April Sampson <sampsona@rcgov.us>; Mark Schnee <schneelawfirm@gmail.com>; hweiss@scag.gov

Subject: Re: I see SC Circuit Judge Brown is scheduled for the 5th Cir on 31 March 2022 "am" BUT I have no idea what time and I see NO NOTICE on any of my cases.

I still have NOT received any links; I STILL think SC Circuit Judge Brown has no jurisdiction to relieve you from the Court of Appeals case; **and I still think this is a set-up to frame me for direct contempt** because y'all never cease to want to harm me even though it destroys what soul you have left.

Messers. Zelenka and Blicht are copied because, as prosecutors, they should know that fabricating more criminal charges to get unfair advantage in one set of charges is unethical. The strange timing of that hearing is one day ahead of my due 1 April 2022 submission to SC's Supreme Court in SC Appellate Case 2021-000815, which Mr. Zelenka is prosecuting with Mr. Blicht second chairing. Also, Mr. Tex Davis is copied because he should report himself to ODC for having, over a year or more advised Dan Addison on how to work against the latter's own client while avoiding a grievance.

Messers. Ryan and Zelenka, and SC's Supreme Court already have evidence of how a previous stand-by counsel, April Sampson, worked against me, and of how another previous stand-by counsel, Mark Schnee, worked against me while pretending his "ethics" so required, when he was so unethical he got disbarred.

FOLLOW UP.

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**From:** Dan Addison <[DAddison@hallboothsmith.com](mailto:DAddison@hallboothsmith.com)>

**Sent:** Wednesday, March 30, 2022 1:19 PM

**To:** Marie Faltas <[Marie\\_Faltas@hotmail.com](mailto:Marie_Faltas@hotmail.com)>

**Subject:** RE: I see SC Circuit Judge Brown is scheduled for the 5th Cir on 31 March 2022 "am" BUT I have no idea what time and I see NO NOTICE on any of my cases.

Judge Brown's clerk s sending you a Webex link today. The hearing is tomorrow at 9 am by Webex, virtual court. It is for my motion to be relieved. That is the only issue for the hearing

### Dan Addison

Attorney at Law | Hall Booth Smith, P.C.



O: [843.720.3460](tel:843.720.3460)

111 Coleman Boulevard, Suite 301

D: [843.720.3485](tel:843.720.3485)

Mount Pleasant, SC 29464

[hallboothsmith.com](http://hallboothsmith.com)



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**From:** Marie Faltas <[Marie\\_Faltas@hotmail.com](mailto:Marie_Faltas@hotmail.com)>

**Sent:** Wednesday, March 30, 2022 10:45 AM

**To:** Dan Addison <[DAddison@hallboothsmith.com](mailto:DAddison@hallboothsmith.com)>

**Cc:** Marie Assa'ad-Faltas <[marieassaadfaltas@gmail.com](mailto:marieassaadfaltas@gmail.com)>; James, Marshall S <[Marshall.James@columbiasc.gov](mailto:Marshall.James@columbiasc.gov)>; Saxon, Jessica <[jsaxon@sccid.sc.gov](mailto:jsaxon@sccid.sc.gov)>; Robert Michael Dudek <[rdudek@sccid.sc.gov](mailto:rdudek@sccid.sc.gov)>; Timothy L. Griffith <[tlgriffith@tlgriffith.com](mailto:tlgriffith@tlgriffith.com)>; Young, Hervy <[hyoung@sccid.sc.gov](mailto:hyoung@sccid.sc.gov)>; hryan@sccid.sc.gov

**Subject:** I see SC Circuit Judge Brown is scheduled for the 5th Cir on 31 March 2022 "am" BUT I have no idea what time and I see NO NOTICE on any of my cases..

Repeating the subject line: **I see SC Circuit Judge Brown is scheduled for the 5th Cir on 31 March 2022 "am" BUT I have no idea what time and I see NO NOTICE on any of my cases.**

I still this as a new set up for Dan Addison to have an excuse to not respond to the 25 March 2022 deficiency letter in 2022-00039 and get it dismissed **and/or** to set me up for new contempt of court. **Again, someone PLEASE FOLLOW UP and tell me: (1) which, if any, of my cases this pertains to? (2) if so, what time "am"? (3) if and when I shall, God willing, get an invitation to that WebEx hearing? and (4) if I may invite observers?**

Thanks and again FOLLOW UP.



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**Cases**

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**SC Court of Appeals**

Case Information: 2022-000339			
<b>Court:</b>	Court of Appeals	<b>Classification:</b>	Appeal - Common Pleas - Crim - Appeal from Summary Ct.
<b>Short Title:</b>	City of Columbia v. Marie Assa'd-Faltas	<b>Case Status:</b>	Pending
	<a href="#">View Full Title</a>		
<b>Consolidated:</b>			
<b>Filed Date:</b>	03/15/2022	<b>Oral Argument Date:</b>	
<b>Disposition Date:</b>		<b>Disposition Type:</b>	
<b>Remittitur Date:</b>			
<b>Lower Court or Tribunal:</b>	Richland (2019CP4001374)		

Party Information			
Appellate Role	Party Name	Former	Attorney(s)
Appellant	Marie Assa-ad Faltas	N	Richard Daniel Addison
Respondent	City of Columbia	N	Marshall Schumpert James

**Views**

Display: Descending ▼

Filed Date	Event Information	Doc
03/25/2022	Correspondence - Outgoing (Notice of Appeal Initial Letter)	
03/25/2022	Deficiency - Deficiency Letter Sent	
03/23/2022	Transfer - To Court of Appeals	
03/23/2022	Non-Dispositional Decision - Transfer order	
03/15/2022	Notice of Appeal (Civil) - Initial	

Notice of Appeal
Order (2/9/2022)
Order (3/11/2022)
Transmittal letter



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**Cases**

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SC Court of Appeals

<b>Case Information: 2022-000339</b>			
<b>Court:</b>	Court of Appeals	<b>Classification:</b>	Appeal - Common Pleas - Crim. Appeal from Summary Ct.
<b>Short Title:</b>	City of Columbia v. Marie Assa d-Faltas <a href="#">View Full Title</a>	<b>Case Status:</b>	Pending
<b>Consolidated:</b>			
<b>Filed Date:</b>	03/15/2022	<b>Oral Argument Date:</b>	
<b>Disposition Date:</b>		<b>Disposition Type:</b>	
<b>Remittitur Date:</b>			
<b>Lower Court or Tribunal:</b>	Richland (2019CP4001374)		

<b>Party Information</b>			
Appellate Role	Party Name	Former	Attorney(s)
Appellant	Marie Assa-ad Faltas	N	Richard Daniel Addison
Respondent	City of Columbia	N	Marshall Schumpert James

<b>Views</b>
Display: Descending <input type="button" value="Go"/>

Filed Date	Event Information	Doc
03/25/2022	Correspondence - Outgoing (Notice of Appeal Initial Letter)	
03/25/2022	Deficiency - Deficiency Letter Sent	
03/23/2022	Transfer - To Court of Appeals	
03/23/2022	Non-Dispositional Decision - Transfer order	
03/15/2022	Notice of Appeal (Civil) - Initial	

**FW: Webex meeting invitation: Motion to Relieve Counsel**

Brown, Craig <cbrownj@sccourts.org>

Thu 2022-03-31 9:26 AM

To: Marie\_Faltas@hotmail.com <Marie\_Faltas@hotmail.com>

1 attachments (8 KB)

Webex\_meeting.ics;

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-----Original Appointment-----

**From:** Brown, Craig

**Sent:** Thursday, March 31, 2022 8:57 AM

**To:** Brown, Craig; Brown, Craig Law Clerk (Mikell Scarborough)

**Subject:** Webex meeting invitation: Motion to Relieve Counsel

**When:** Thursday, March 31, 2022 9:00 AM-10:00 AM America/New\_York.

**Where:** <https://scjudicial.webex.com/scjudicial/j.php?MTID=mc5861551cb636e380e4a0881917f8739>

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**Craig Brown is inviting you to a scheduled Webex meeting.**

Thursday, March 31, 2022

9:00 AM | (UTC-04:00) Eastern Time (US & Canada) | 1 hr



**More ways to join:**

**Join from the meeting link**

<https://scjudicial.webex.com/scjudicial/j.php?MTID=mc5861551cb636e380e4a0881917f8739>

**Join by meeting number**

Meeting number (access code): 2343 637 4822

Meeting password: b7vMB3PZCp9

**Tap to join from a mobile device (attendees only)**

+1-408-418-9388,,23436374822## United States Toll

**Join by phone**

+1-408-418-9388 United States Toll

**Global call-in numbers**

**Join from a video system or application**

Dial [23436374822@scjudicial.webex.com](tel:23436374822@scjudicial.webex.com)

You can also dial 173.243.2.68 and enter your meeting number.

Need help? Go to <https://help.webex.com>

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