

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

IN THE ORIGINAL JURISDICTION

Case No. 2023-000845

Catherine Mogy and Craig Hanna, Petitioners,

vs.

The Law Offices of Gary W. Crawford and Rebecca Crawford, Respondents.

SUMMONS

YOU ARE HEREBY SUMMONED and required to answer the Petition herein, a copy of which is herewith served upon you, and to serve a copy of your response to this Petition upon the subscriber at the address shown below, within twenty (20) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the Petition.

/s/Tucker S. Player, Esq.
Player Law Firm LLC
Attorney for the Petitioners
512 Village Church Drive
Chapin, South Carolina 29036
(803)315-6300
(803)772-8037 (fax)

Columbia, South Carolina
May 24, 2023

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court

IN THE ORIGINAL JURISDICTION

Case No. 2023-000845

Catherine Mogy and Craig Hanna, Petitioners,

vs.

The Law Offices of Gary W. Crawford and Rebecca Crawford, Respondents.

**EMERGENCY PETITION FOR WRIT OF INJUNCTION AND APPOINTMENT OF
RECEIVER FOR GARY W. CRAWFORD**

Petitioners respectfully petition this Court to hear in its original jurisdiction their Emergency Petition for Writ of Injunction and an appointment of a receiver for the files of Gary W. Crawford, and a temporary injunction preventing any non-lawyer from accessing any files currently under the custody and control of the law offices of Gary W. Crawford. This Petition seeks a Writ or Order enjoining Rebecca Crawford from controlling, modifying, or otherwise possessing the files of any client of Gary Crawford or the law offices of Gary Crawford. As demonstrated by the attached Exhibits, Rebecca Crawford is operating a law firm without the presence or control of any attorneys and is refusing to provide files to owners of those files, the clients. In addition, the current Rules providing for the appointment of a receiver for a deceased attorney conflict and result in such requests being impossible under the current framework. Pursuant to Rule 31(c) of the Rules of Lawyer Disciplinary Enforcement, only the office of disciplinary counsel may petition this Court for the appointment of a receiver over the files of a

deceased lawyer. However, the Office of Disciplinary Counsel claim, and not without justification, they do not have jurisdiction over deceased lawyers. The result is a broken system that has prevented clients from gaining access to their files. Petitioners seek this Court to immediately appoint a receiver over the client files possessed by the Law Offices of Gary W. Crawford.

In support of their Petition, Petitioners state as follows:

STATEMENT OF THE FACTS

Catherine Mogy demanded her file from Gary Crawford more than a year ago. Last November, something happened that made her suspect Crawford was actively working against her and lying to her. On or about March 15, 2023, she made another demand for her file and stated that she would take additional action if he did not provide the file immediately. Exhibit

1. Ms. Mogy had previously inquired about a \$1,000,000.00 life insurance policy to which she was a beneficiary and demanded an accounting of those funds. Four days later, Gary Crawford killed himself in the parking lot of his office. Id.

Craig Hanna is the son of Carlos Hanna who died in 2010. Exhibit 2. Craig Hanna was appointed the personal representative of his father's Estate when his probate matter was reopened in November 2022. Mr. Hanna, as the personal representative of the Estate of Carlos Hanna, requested his files from the law Offices of Gary Crawford. He has yet to obtain any response or documents from anyone associated with the law offices of Gary W. Crawford.

Upon Mr. Crawford's death, every petitioner requested their files from Gary Crawford's office. Exhibits 2. They received no response. They then requested help from Crawford's designated custodian, Brown Johnson. They received no response, much less any help. Id. In fact, Mr. Johnson and his entire law firm "retired" on May 18, 2023, apparently without little to

no prior notice. **Exhibit 2.** Petitioners then made complaints to the Office of Disciplinary Counsel. They received no help as ODC declared they had no jurisdiction over deceased attorneys. **Exhibits 1 and 2.** The only thing left for petitioners was to hire another attorney for assistance. Upon retention of counsel, subpoenas were issued for the production of the files. Phillip Grimsley attempted to serve those subpoenas on the law offices of Gary Crawford on May 11, 2023. Upon arriving at the law offices of Gary Crawford, he was met by the wife of Gary Crawford, Rebecca Crawford, who promptly refused to even accept service. **Exhibit 3.** There were no lawyers in the office at the time Grimsley attempted to serve the subpoenas.

At this point, Petitioners were left with only one possible source of authority to obtain their files, which is this Court. While a nearly three month delay in any response or access to their files is unacceptable and improper, there are additional reasons for expediency and immediate action. We have no idea what the files contain and the volume of public records to review is massive. It will take substantial time to review all of the relevant documents and Petitioners are just beginning that review. Yet, from the limited review to date, there are some very troubling documents in the public record relating to Petitioners. More importantly, one former client did get her file from Gary Crawford and Brown Johnson, and what she found is more than alarming.

Petitioner Catherine Mogy is a nurse anesthetist. Her job requires her to sign her name on a daily basis. Her typical signature is demonstrated by **Exhibit 1.** **Exhibit 4** is a deed, purportedly signed by Mogy, witnessed by the deceased Gary Crawford and notarized by Respondent Rebecca Crawford. No one else witnessed the signatures thereon. Petitioner Mogy does not remember signing **Exhibit 4** and believes that the signature on the deed is not her own. However, the signature on the Affidavit accompanying the deed is clearly not Catherine Mogy's.

Yet, it is notarized by Rebecca Crawford.

This deed is very troubling. Petitioners are in the process of retaining a handwriting expert to fully investigate the authenticity of Exhibit 4. But considering this evidence, Petitioners do not believe this was a single transaction. Due to the lack of any attorney currently maintaining and possessing the client files of Gary W. Crawford, and the fact that the woman who notarized that clearly forged signature is currently the only person in the custody and control of all those client files, this is the definition of an emergency situation.

STATEMENT OF THE CASE

The Petition for the appointment of a receiver and an injunction against Rebecca Crawford is being filed independently of any ongoing litigation or probate matter.

ARGUMENTS

Petitioner brings this action in the original jurisdiction of the Supreme Court of South Carolina pursuant to Article V, § 5 of the South Carolina Constitution which vests the Supreme Court with the power “to issue writs or orders of injunction, mandamus, quo warrants, prohibition, certiorari, habeas corpus and other original and remedial writs.” This grant of power has been codified in Section 14-3-310 of the Code of Laws of South Carolina 1976.

This Court is entrusted with the power to regulate the practice of law. *See* S.C. CONST. art. V, § 4; S.C. Code Ann. § 40-5-10 (2011) (recognizing “[t]he inherent power of the Supreme Court with respect to regulating the practice of law”); *Linder v. Ins. Claims Consultants, Inc.*, 348 S.C. 477, 486, 560 S.E.2d 612, 617 (2002) (“Under the South Carolina Constitution, this Court has the duty to regulate the practice of law in South Carolina.”). Generally, the practice of law includes “the preparation of pleadings, and other papers incident to actions and special

proceedings, and the management of such actions and proceedings on behalf of clients before judges and courts." *State v. Despain*, 319 S.C. 317, 319, 460 S.E.2d 576, 577 (1995) (quoting *In re Duncan*, 83 S.C. 186, 189, 65 S.E. 210, 211 (1909)). The practice of law "extends to activities . . . which entail specialized legal knowledge and ability." *Linder*, 348 S.C. at 487, 560 S.E.2d at 617 (quoting *State v. Buyers Serv. Co., Inc.*, 292 S.C. 426, 430, 357 S.E.2d 15, 17 (1987)). "Other than these general statements, there is no comprehensive definition of the practice of law. Rather, what constitutes the practice of law must be decided on the facts and in the context of each individual case." *Roberts v. LaConey*, 375 S.C. 97, 103, 650 S.E.2d 474, 477 (2007) (citing *Linder*, 348 S.C. at 487, 560 S.E.2d at 617-18); *see also Medlock v. Univ. Health Servs.*, 404 S.C. 25, 28, 743 S.E.2d 830, 831 (2013) ("We have encouraged any interested individual to bring a declaratory judgment action in this Court's original jurisdiction to determine the validity of any questionable conduct.") *Rogers Townsend & Thomas v. Peck*, 419 S.C. 240, 244, 797 S.E.2d 396, 398 (2017). In fact, this Court possesses the exclusive jurisdiction over the determination of what constitutes the practice of law. *Hambrick v. GMAC Mortg. Corp.*, 370 S.C. 118, 634 S.E.2d 5 (Ct. App. 2006).

At this point, Petitioners have no evidence that Rebecca Crawford is giving legal advice or consulting with clients. However, an integral part of the practice of law constitutes the control, protection and maintenance of client files and information. Rule 1.15 of the South Carolina Rules of Professional Conduct is actually entitled "Safekeeping Property." The only person known to be alive and in control of the client files of the deceased Gary Crawford is Rebecca Crawford, a non-lawyer that is not employed or supervised by *any* lawyer. At this moment, there is no lawyer responsible for the files owned by any client of Gary Crawford and no way to compel the

production of those files under the current rules. While it seems axiomatic that maintaining the possession and control over client files without the supervision of an attorney constitutes the unauthorized practice of law, no specific precedent exists to establish such a rule. Thus, Petitioners seek a declaratory judgment that maintaining the possession and control over client files without the supervision of an attorney constitutes the unauthorized practice of law in South Carolina.

Once the indicia of fraud arise with regard to the actions of the nonlawyer in control of those files, it becomes a matter of urgency that cannot wait until all parties are given time to respond. The Court must take immediate action by way of temporarily enjoining Rebecca Crawford from possessing, modifying, or otherwise controlling access to the client files of her deceased husband. In addition, Petitioners pray that this Court accept their demand for the appointment of a receiver and do so immediately to insure the client files are brought back under the supervision of a licensed attorney.

CONCLUSION

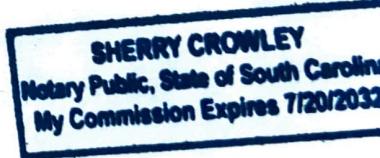
The clients of Gary Crawford are currently without any protections required the Rules of Professional Conduct governing the protection and maintenance of their client files. The Rules currently conflict, leaving the procedure to appoint a receiver to be inoperable. This Court must act immediately to protect those files and assign a licensed attorney in good standing to take possession and control over the files. Petitioner also seeks a declaratory judgment that unless and until an attorney is assigned as the custodian of the files, with all of the rules and protections that obligate that lawyer, any maintenance and/or control of client files without attorney supervision constitutes the unauthorized practice of law.

/s/Tucker Player, Esq.
South Carolina Bar No. 16217
Player Law Firm, LLC
512 Village Church Drive
Chapin, South Carolina 29036
p. (803) 315-6300
f. (803) 772-8037

May 23, 2023

STATE OF SOUTH CAROLINA)
CATHERINE MOGY)
COUNTY OF FLORENCE)
AFFIDAVIT OF

1. My name is Catherine Mogy and I give this affidavit under the penalty of perjury and subject to the contempt powers of the Court.
2. I am over the age of 18. I am a citizen and resident of Florence County, and I am competent to testify under the laws of the State of South Carolina.
3. I am currently a nurse anesthetist working in Florence.
4. I have requested my file from Gary Crawford numerous times over the last 20 years.
5. I understood that there was a \$1 million insurance policy for my husband's company that paid upon his death for the specific purpose of purchasing his shares from me.
6. I never received any funds from any insurance policy and I began asking Gary about it in 2022.
7. In November 2022, I began to suspect that Gary was lying to me about numerous things. I also thought he was actively trying to work against me in a case pending in Dorchester County. As a result of my suspicions, I requested a copy of all files related to me or my deceased husband.
8. I received no response and no file. I then contacted Gary on or about March 15, 2023 demanding my file and informing him that I would seek redress with the bar if he did not respond.
9. Gary Crawford committed suicide on March 19, 2023.
10. Upon learning of Gary's death, I immediately requested my file again. There was no response.
11. I attempted to obtain my file by contacting Brown Johnson, the designated custodian of Gary Crawford's file. I received no response.
12. I contacted the South Carolina Office of Disciplinary Counsel for assistance in obtaining my file. I was told that the South Carolina Office of Disciplinary Counsel did not have jurisdiction over a deceased lawyer.
13. Upon consulting with an attorney, it was brought to my attention that there was a suspicious deed on record in Florence County. That deed is attached as Exhibit 8 to my Petition for Writ of Injunction, Writ of



***Prohibition, and Appointment of Receiver for Gary W.
Crawford.***

14. The signature on the deed does not appear to be my signature as I typically sign all official documents as "Catherine Mogy," not "Cathy Mogy."
15. The signature on the accompanying Affidavit, notarized by Rebecca Crawford, is not my signature.

FURTHER AFFIANT SAYETH NOT.

Catherine Mogy

Catherine Mogy

This 24 Day of May, 2023

SWORN TO BEFORE ME this Sherry Crowley
day of 24 May, 2023.

Sherry Crowley

Notary Public for the State of South Carolina

My Commission Expires: 7/20/2032

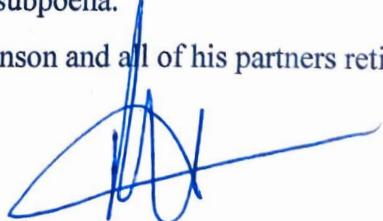


EXHIBIT 2

STATE OF SOUTH CAROLINA)
)
COUNTY OF FLORENCE) AFFIDAVIT OF CRAIG HANNA

1. My name is Craig Hanna and I give this affidavit under the penalty of perjury and subject to the contempt powers of the Court.
2. I am over the age of 18. I am a citizen and resident of Florence County, and I am competent to testify under the laws of the State of South Carolina.
3. I am the son of Carlos Hanna, who died in 2010.
4. I have requested my father's file from Gary Crawford numerous times over the last 10 years.
5. While I was the guardian ad litem for my mother, I requested her files from Gary Crawford and he refused to provide it.
6. I am now the personal representative of my father's estate and I requested my father's files from Gary Crawford under that authority before Crawford died. He refused to provide copies of the files.
7. Upon learning of Gary's death, I immediately requested the files again. There was no response.
8. I contacted the South Carolina Office of Disciplinary Counsel for assistance in obtaining my file. I was told that the South Carolina Office of Disciplinary Counsel did not have jurisdiction over a deceased lawyer.
9. I attempted to obtain my father's file by contacting Brown Johnson, the designated custodian of Gary Crawford's files. I received no response.
10. Upon retaining an attorney, I authorized the issuance of a subpoena in the Probate Matter involving my father to obtain his file.
11. Rebecca Crawford refused to accept service of the subpoena.
12. On May 19, 2023, I received notice that Brown Johnson and all of his partners retired the day before.

FURTHER AFFIANT SAYETH NOT.



Craig Hanna

This 23 Day of May, 2023

SWORN TO BEFORE ME this 23
day of May, 2023.

Hope R. Bailey
Notary Public for the State of South Carolina

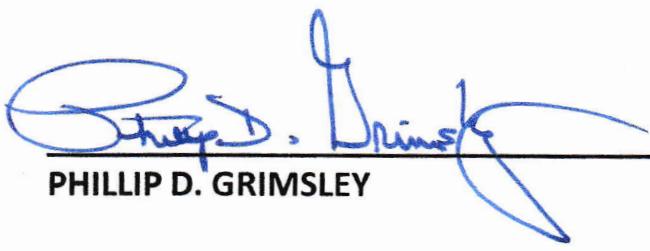
My Commission Expires: _____ **Hope R. Bailey**
NOTARY PUBLIC
State of South Carolina
My Commission Expires 6/24/2032



EXHIBIT 3

ATTACHED AFFIDAVIT OF PHILLIP D. GRIMSLEY

On Thursday May 11, 2023, I, Phillip D. Grimsley went to 501 Coit St, Florence, S.C., the office of attorney Gary Crawford. I had two subpoenas to serve to Mr. Crawford. When I arrived, there was a black Mercedes Benz car parked in front. A note on the door read, FedEx, knock I'm inside. I knocked on the door and a lady answered, who later identified herself as the wife of Gary Crawford. I identified myself and gave Mrs. Crawford my business card. I explained why I was there and about the subpoenas, who they were for and what they were concerning. I let Mrs. Crawford look at them. Mrs. Crawford stated that Mr. Crawford had passed, and she was the Personal Representative of the estate. I asked if she could and would accept service. Mrs. Crawford stated she didn't understand what they wanted with records on Carlos Hanna, "he's been dead a long time". She went on to say she would not accept the subpoenas made out to Gary Crawford. I asked if any attorney(s) had been assigned to help with the closing of the office and she replied, I have three attorneys helping me. I replied, "well maybe if you let them know, one of them would accept service. Mrs. Crawford said, "well the attorney can make them out to the Personal Representative of the Estate, and I will accept them. I asked would she be in the office the next day and she said she was going out of town for the weekend. I asked if she would be back in the office next week and she stated she would. I departed.

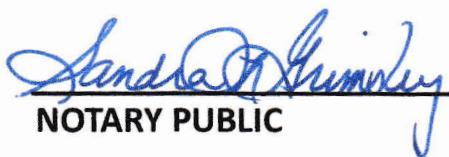


MAY 12, 2023

PHILLIP D. GRIMSLEY

DATE

SUBSCRIBED AND SWORN TO BEFORE ME BY THE AFFIANT WHO IS PERSONALLY KNOWN TO ME.



MAY 12, 2023

NOTARY PUBLIC

DATE

MARCH 29, 2029

MY COMMISSION
EXPIRES

Received 5/27/2004 16:00:39 PM

Book A 844 Page 0933

Deeds

EXHIBIT 4

CONNIE R. BELL
FLORENCE COUNTY CLERK OF COURT
CITY-COUNTY COMPLEX, 180 N. IRBY ST., MSC-E
FLORENCE, SOUTH CAROLINA 29501
(843) 665-3031

RECEIVED FROM: G CRAWFORD 25540,3447

DATE: 052704 RECEIPT NO: 191549-000000

DESCRIPTION

<u># OF</u> <u>INST.</u>	<u>AMOUNT</u>	<u>FEES</u>	<u>#PAGES</u>	<u>STATE</u>	<u>** FEE **</u> <u>COUNTY</u>	<u>TOTAL</u>
Deeds	103,632.00	10.00	4	BOOK: A844 FROM PAGE: 933 THRU PAGE: 936 270.40	114.40	394.80

THIS SHEET IS NOW PART OF THIS DOCUMENT
===== PLEASE LEAVE ATTACHED =====

TOTAL RECEIPT: 10.00 270.40 114.40 394.80

TOTAL	CHECK	CASH	CHANGE
394.80	1,403.30	.00	.00

CR1

CLERKPAY

10 Tonya Carmon

160040

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

} FILED
) TITLE TO REAL ESTATE
2004 MAY 21 P 3:54

Gary W. Crawford
Attorney at Law
P.O. Box 508
Florence, SC 29503

Grantee(s) address: 427 Woodvale Drive
Florence, SC 29501

Tax Map No.: 01253-03-006

CONNIE R. BELL
CCCP & GS
FLORENCE COUNTY, SC
THIS PROPERTY DESIGNATED AS
MAP 01253 BLK 03 PARCEL 006
ON FLORENCE COUNTY TAX MAPS

SPLIT FROM _____
FLORENCE COUNTY TAX ASSESSOR

KNOW ALL MEN BY THESE PRESENTS, that the ESTATE OF RICHARD A. MOGY, in consideration of One Hundred Three Thousand Six Hundred Thirty Two and 00/100 (\$103,632.00) Dollars, the receipt of which is hereby acknowledged, has granted, bargained, sold and released, and by these presents does grant, bargain, sell and release unto CECIL EDWARD FLOYD, JR., his heirs and assigns, the following described property:

All that certain piece, parcel or lot of land with improvements thereon situate, lying and being in the County of Florence, State of South Carolina, being designated as Lot No. 8 as shown on a Final Plat prepared for Gable Ridge Subdivision, Phase III, by Nesbitt Surveying Company dated February 1, 2001 and recorded in the Office of the clerk of court for Florence County in Plat Book 77, Page 100. Reference being had to said plat for a more complete and accurate description.

This being the same property conveyed to Richard A. Mogy by deed of Bath, Inc. as recorded in the Office of the Clerk of Court for Florence County in Deed Book A-705, Page 1966 on 11/6/02.

Together with all and singular the rights, members, hereditaments and appurtenances to said premises belonging or in any wise incident or appertaining to;

To have and to hold all and singular the premises before mentioned unto the Grantee and the Grantee's heirs and assigns forever.

And the Grantor does hereby bind the Grantor and the Grantor's successors and assigns, to

1

\$ STATE FEE 270.40
\$ COUNTY FEE 114.40

A844-933

934

warrant and forever defend all and singular said premises unto the Grantee and the Grantee's heirs and assigns and against every person whomsoever lawfully claiming or to claim the same or any part thereof.

WITNESS the Grantor's hand and seal this 25th day of May, 2004.

ESTATE OF RICHARD A. MOGY

By: Cathy Mogy

Its: Personal Representative

SIGNED, SEALED AND DELIVERED IN
THE PRESENCE OF:

Rebecca H. Hall
Danyelawne Hall

STATE OF SOUTH CAROLINA

COUNTY OF FLORENCE

)

) PROBATE

PERSONALLY appeared before me the undersigned witness who being duly sworn, deposes and states that (s)he with the other witness whose name is subscribed above witnessed the execution of the foregoing document.

Danyelawne Hall

SWORN to before me this
25 day of May, 2004.

Notary Public for S.C.

My Commission Expires: 6/30/01

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

)
AFFIDAVIT
)

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this affidavit and I understand such information.
2. The property being transferred is located in Florence County, South Carolina and is identified by the Tax Map Number(s) as indicated on the within deed. The property was transferred by the Grantor(s) herein to the Grantee(s) herein on the day and year first above written.
3. The transaction was (check one):
 (a) Subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 (b) Subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
 (c) Exempt from the deed recording fee because:
(If exempt, please skip items 4-7 and go to Item 8 of this Affidavit.)

If exempt under exemption #14 as described in the Information Section of this affidavit, did the agent and principal relationship exist at the time of the original sale and was the purpose of this relationship to purchase the realty? Check Yes _____ or No _____

Check one of the following if either Item 3(a) or Item 3(b) above has been checked (See Information section of this affidavit.):

- The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$103,632.00
- The fee is computed on the fair market value of the realty which is \$_____.
- The fee is computed on the fair market value of the realty as established for property tax purposes which is \$_____.

5. Check Yes _____ or No to the following:

A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If "Yes," the amount of the outstanding balance of this lien or encumbrance is \$_____.

6. The deed recording fee is computed as follows:

Amount listed in Item 4 above:	\$ 103,632.00
Amount listed in Item 5 above:	\$ _____
Subtract Line 6(b) from Line 6(a) and	\$ 103,632.00

and place result here.

7. The deed recording fee is based on the amount listed on Line 6(c) above and the deed recording fee due is: \$384.80

8. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Grantor

9. I further understand that a person required to furnish this affidavit who wilfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

~~REASONABLE PERSON CONNECTED WITH THE TRANSACTION~~
PRINT OR TYPE NAME: CATHERINE W. MOGY

SWORN to before me this
day of May, 2004.

Notary Public for South Carolina
My Commission Expires: 05/05/05

THE STATE OF SOUTH CAROLINA IN THE SUPREME COURT

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Plaintiffs, complaining of the Defendants, pleads as follows:

General Allegations

1. Plaintiffs are citizens and residents of Florence County, South Carolina.
2. Defendant is a citizen and resident of Florence County.
3. Catherine Mogy was previously represented by Gary Crawford in several matters, including the probate of her late husband's estate. She demanded her file from Gary Crawford more than a year ago.

6. Upon learning of Gary Crawford's death, Petitioner Mogy again demanded her file. No response was forthcoming.

7. Craig Hanna is the son of Carlos Hanna who died in 2010.

8. Craig Hanna was appointed the personal representative of his father's Estate when his probate matter was reopened in November 2022.

9. Mr. Hanna, as the personal representative of the Estate of Carlos Hanna, requested his files from the law Offices of Gary Crawford. He has yet to obtain any response or documents from anyone associated with the law offices of Gary W. Crawford.

10. Upon Mr. Crawford's death, petitioner requested their files from Gary Crawford's office. They received no response.

11. Petitioners then requested help from Crawford's designated custodian, Brown Johnson. They received no response.

12. Mr. Johnson and his entire law firm "retired" on May 18, 2023, apparently without little to no prior notice.

13. Upon retention of counsel, subpoenas were issued for the production of the files. Phillip Grimsley attempted to serve those subpoenas on the law offices of Gary Crawford on May 11, 2023. Upon arriving at the law offices of Gary Crawford, he was met by the wife of Gary Crawford, Rebecca Crawford, who promptly refused to even accept service.

14. There were no lawyers in the office at the time Grimsley attempted to serve the subpoenas.

FOR A FIRST CLAIM
Extraordinary Writ

15. All allegations of this Complaint are reiterated herein as if set forth verbatim.

16. The Court has the "power to declare rights, status and other legal relations whether

or not further relief is or could be claimed.” S.C. Code Ann. § 15-53-20 (2014). Additionally, “relief based on a declaratory judgment or decree may be granted whenever necessary or proper.” *Id.* § 15-53-120.

17. An integral part of the practice of law constitutes the control, protection and maintenance of client files and information. Rule 1.15 of the South Carolina Rules of Professional Conduct is actually entitled “Safekeeping Property.”

18. Plaintiff seeks a declaratory judgment that Rebecca Crawford engaged in the unauthorized practice of law by maintaining control over, and refusing access to, the client files of Gary W. Crawford without the direct supervision of an attorney.

19. Plaintiff further requests such equitable relief as is necessary and proper in light of such relief as is requested herein.

WHEREFORE, the Plaintiff requests the Court to issue the relief prayed for above in the individual causes of action, with such other and further relief as is just.

Respectfully submitted,

/s/Tucker Player, Esq.

South Carolina Bar No. 16217
Player Law Firm, LLC
512 Village Church Drive
Chapin, South Carolina 29036
p. (803) 315-6300
f. (803) 772-8037
Attorney for Petitioners

May 23, 2023