

IN THE SUPERIOR COURT OF COBB COUNTY  
STATE OF GEORGIA

vs. Nathan Wade,  
Joycelyn Wade.

CIVIL ACTION FILE NUMBER  
21108166

PETITIONER'S RESPONSE TO RESPONDENT'S MOTION TO DISQUALIFY COUNSEL AND  
MOTION TO ORDER MEDIATION, FINAL TRIAL

COMES NOW, Plaintiff in the above-styled action, by and through the undersigned attorney, and moves the Honorable Court to Order this matter to mediation immediately and in no less than 30 days from the date of July 29, 2022, to a Final Trial no later than 60 days from the date of July 29, 2022.

Plaintiff, a citizen of the United States of America, has a protected right to the Counsel of his choice in a legal matter. Mr. Wade, his counsel of record and all served in this unnecessarily litigated case have fully responded. Third parties have been served and have fully complied. All discovery has been responded to, offers for settlement have been made, Respondent has refused to mediate and allow this matter to settle in accordance with equity and fairness as Georgia Law provides.

This is Divorce with no minor children that should have resolved by now, yet Respondent is being stubbornly litigious and dragging the matter out for no stated reasons. Plaintiff is not contesting or being stubbornly litigious.

Plaintiff requests that this Court Order the matter to mediation as stated herein above and if the matter does not settle to a Final Trial within 60 days of July 29, 2022.

WHEREFORE, PLAINTIFF prays as follows:

- (a) That the Respondent's Motion to Disqualify Petitioner's Counsel be denied;
- (b) That the Petitioner's Motion to Order Mediation and a Final Trial be granted;

(c) That the Petitioner have such other and further relief as this Court deems just and appropriate.

Respectfully submitted, this the 13 day of July 2022.

Terrence A. Bradley

Terrence A. Bradley  
Wade Bradley & Campbell Firm  
Georgia Bar Number: 705138  
1827 Powers Ferry Rd., Bldg 23  
Atlanta, Georgia 30339  
770.303.0700 (Telephone)  
admin@thewbcfirm.com