

STATE OF SOUTH CAROLINA )  
)  
)  
COUNTY OF YORK )  
)  
)  
Karen K. Baber, )  
)  
)  
Plaintiff )  
)  
)  
-vs- )  
)  
)  
Summit Funding, Inc. et al., )  
)  
)  
)  
Defendant(s). )  
\_\_\_\_\_ )

IN THE COURT OF APPEALS

Appellate Case No.: 2019-001440

**RECEIVED**  
**Jun 16 2022**  
**SC Court of Appeals**

**MOTION TO WITHDRAW  
AS COUNSEL**

**COMES NOW** the undersigned counsel for party Defendant and, pursuant to the applicable Rules of Civil Procedure, respectfully submits this Motion to Withdraw as Counsel for party Defendant (Gloria Robinson). In furtherance of this Motion, the undersigned counsel would respectfully show as follows:

1. Consistent with Rule 407 of the Appellate Court Rules, and specifically, Rule 1.16(b)(1) of the Rules of Professional Conduct, there is at least one ground which supports the permissive withdrawal of the undersigned counsel. Such grounds include:

a. Subpart (b)(1): Withdrawal can be accomplished without material adverse effect on the interests of the client who no longer wishes the undersigned to participate in this matter.

Because withdrawal can be accomplished without any material adverse effect on the interests of any Defendant, the undersigned respectfully request the Court grant to a motion to withdraw.

Respectfully submitted,

June 15, 2022

A handwritten signature in blue ink, appearing to read "Mt Belton", written over a horizontal line.

Montrio M. Belton  
Law Office of Montrio Belton, LLC  
511 Saluda Street  
P.O. Box 566  
Rock Hill, SC 29731  
(803) 324-4259  
(803) 324-4522 facsimile

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**CERTIFICATE OF SERVICE**  
**MOTION TO WITHDRAW**  
**AS COUNSEL**

The undersigned of Law Office of Montrio Belton, LLC., hereby certifies that she has served the following Attorneys of record with a Certificate of Service for the **Motion to Withdraw as Counsel**, delivered by certified mail, a copy of same, postage prepaid and return address clearly indicated, to the following on this **15th** day of **JUNE 2022**.

**Mr. Glenn E. Bowens, Esquire**  
**PO Box 424**  
**Winnsboro, SC 29180**

**Mr. Creighton B Coleman, Esquire**  
**PO Box 1006**  
**Winnsboro, SC 29180**

**Mr. Thomas Lynn Ogburn, III, Esquire**  
**301 S. College St., STE 2900**  
**Charlotte, NC 28202**

**Ms. Susan Elizabeth Driscoll, Esquire**  
**11520 N. Community House Road Ste., 200**  
**Charlotte, NC 28277**

LaDaria L. Richardson

LaDaria L. Richardson, Paralegal  
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Rock Hill, SC 29731  
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# Montrio Belton

LAW OFFICES OF MONTRIO BELTON, LLC

June 15, 2022

**RECEIVED**

**Jun 16 2022**

**SC Court of Appeals**

***Via Certified Mail***

South Carolina Court of Appeals  
Attn: Claire Allen, Clerk of Court  
1220 Senate Street  
Columbia, SC 29201

**RE:** Karen K. Baber v. Summit Funding, Inc. et al.  
Appellate Case No.: 2019-001440  
York County Case No.:18-CP-46-1592  
Motion to Withdraw as Counsel (Gloria Robinson)

Dear Ms. Allen:

Please find the following Motion to withdraw as Counsel attached in the above referenced matter before the South Carolina Court of Appeals pursuant to Rule 407 of the Appellate Court Rules, and specifically, Rule 1.16(b).

Enclosed are the following:

1. A check for \$50.00 filing fee via US Mail
2. Proof of Service to Attorneys of record

Should you need anything else pertaining to this request, please contact me at 803-324-4529 or [scott@montrioelton.com](mailto:scott@montrioelton.com).

Thank you,

*E. Scott Winburn*

E. Scott Winburn

Llr/esw