

**RECEIVED**

**Jun 28 2022**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

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Appellate Case No. 2019-001440

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Karen K. Baber .....Appellant,

v.

Summit Funding, Inc.; Appraisal Innovations, LLC; Brian L. Blue; The Gillen Law Firm,  
P.A.; Michael F. Gillen; Allen Tate Co., Inc.; Colleen Coesens; Jonathan Garvey; Robert  
Ouzts; Connie Delaney; and Gloria Long-Robinson,

of whom

Summit Funding, Inc.; Allen Tate Co., Inc.; Colleen Coesens; Jonathan Garvey; Robert  
Ouzts; and Connie Delaney are the..... Respondents.

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**RESPONSE TO MOTION TO BE RELIEVED**

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Attorney for Summit Funding, Inc

Pursuant to Rule 240(e), SCACR, Respondent Summit Funding, Inc. (Summit) hereby submits the within response to the motion to be relieved as counsel filed by Appellant (Motion).

While Summit does not intend to force counsel to represent a non-responsive client for no compensation, it does feel the need to go on record as objecting to any delay in this matter that could result from the relief sought through the Motion. This case has been pending before this Court since 2019 and has now finally been set for potential consideration in September or October of this year. Summit would ask that any order granting the Motion specify that such action will not result in the case being pushed from consideration in September or October.

**WHEREFORE**, Summit asks that if the Motion is granted, the order allowing counsel to be relieved specify that such relief shall not be grounds for any extension of time as to consideration by this Court or oral argument.

Respectfully submitted,

Date: 06/28/2022

s/ Susan E. Driscoll  
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vs.

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Michael F. Gillen; Allen Tate Co., Inc.; Colleen Coesens; Jonathan Garvey; Robert Ouzts;  
Connie Delaney and Gloria Long-Robinson, ..... Defendants,

Of which Summit Funding, Inc.; Allen Tate Co., Inc.; Colleen Coesens; Jonathan Garvey, Robert  
Ouzts; Connie Delaney; and Gloria Long-Robinson are the Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 28, 2022 she served the following counsel  
with a copy of the *Response to Motion to be Relieved*, required by Rule 262(c)(3), SCAR, by e-  
mail and mailed a copy of the same via First Class, U.S. Mail on June 29, 2022 to the addresses  
shown below.

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Respectfully submitted,

Date: 06/28/2022

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