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**RECEIVED**  
JUN 27 2022  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Daniel D. Hall, Circuit Court Judge

Appellate Case No. 2019-001440

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 Which Summit Funding Inc., Allen Tate Co., Inc., Colleen Coesens, Jonathan Garvey, Robert  
Ouzts, Connie Delany, and Gloria Long-Robinson are the ..... Respondents.

**NOTICE OF MOTION AND MOTION TO BE RELIEVED**

YOU WILL PLEASE TAKE NOTICE that Appellant, Karen K. Baber's Counsel,  
Creighton B. Coleman, does hereby move that he be relieved as Counsel for Appellant, Karen K.  
Baber. The grounds for the Motion are as follows:

That Creighton B. Coleman be relieved as the Attorney for Appellant, Karen K. Baber.  
There has been an inability to communicate between counsel and/or staff with Appellant and  
Appellant has failed to make the required payments on her account. The request is based on the  
grounds that Appellant's attorney feels under the circumstances it is best for both client and  
attorney.

WHEREFORE, Creighton B. Coleman respectfully requests to be relieved as counsel for  
Appellant, Karen K. Baber.

Respectfully submitted,



Creighton B. Coleman (SC Bar # 6521)  
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creighton@colemantolen.com

*Attorney for the Appellant*

Winnsboro, South Carolina  
June 17, 2022

Other Counsel of Record:

Glenn E. Bowens  
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*Attorney for Appellant*

Poyner Spruill, LLP  
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301 S. College Street, Suite 2900  
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togburn@poynerspruill.com  
*Attorney for Respondents Allen Tate Co. Inc., Colleen Coesens, Jonathan Garvey, Robert Ouzts,  
and Connie Delaney*

Driscoll Sheedy, P.A.  
Susan Elizabeth Driscoll  
11520 N. Community House Road, Suite 200  
Charlotte, NC 28277  
sdriscoll@driscollsheedy.com  
*Attorney for Respondent Summit Funding, Inc.*

Montrio Montess Belton, Sr.  
Law Offices of Montrio Belton, LLC  
125 Hampton Street, Suite 200

PO Box 566  
Rock Hill, SC 29731  
vernard@montriobelton.com  
*Attorney for Respondent Gloria Long-Robinson*

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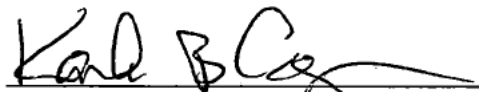
Summit Funding, Inc., Appraisal Innovations, LLC, Brian L. Blue, The Gillen Law Firm, P.A.,  
Michael F. Gillen, Allen Tate Co., Inc., Colleen Coesens, Jonathan Garvey, Robert Ouzts, Connie  
Delaney, and Gloria Long-Robinson,

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

CERTIFICATE OF SERVICE

I certify that I have served the Motion to be Relieved on Karen K. Baber, appellant by  
depositing a copy of same in the United States Mail, postage prepaid, on June 24, 2022, addressed  
to the appellant at her last known address, 255 Rolling Ridge Rd., Rock Hill, SC 29730.

June 24, 2022



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# COLEMAN & TOLEN, LLC

ATTORNEYS AT LAW

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WINNSBORO, SC 29180

June 24, 2022

**RECEIVED**  
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SC Court of Appeals

The Honorable Patricia A. Howard  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Karen K. Baber v. Summit Funding, Inc., et al.  
Appellate Case No.: 2019-001440

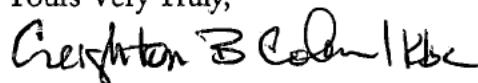
Dear Ms. Howard:

Enclosed please find the Motion To Be Relieved As Counsel in the above referenced case.

Also, enclosed is our firm's check in the amount of Fifty Dollars (\$50.00) for the filing fee.

Further enclosed is the Certificate of Service.

Yours Very Truly,



Creighton B. Coleman

CBC/kbc  
Enclosures

cc: Glenn E. Bowens  
Thomas Lynn Ogburn, III  
Susan Elizabeth Driscoll  
Montrio Montess Belton, Sr.

Creighton B. Coleman LLC  
PO Box 1006  
Winnsboro SC 29180

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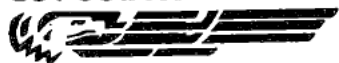
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