

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Sep 07 2022

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Charles B. Simmons, Jr., Master in Equity

Appellate Case No. 2020-001699
Circuit Court Case No. 2020-CP-23-00939

In RE: Kenneth Curtis.....	Plaintiff,
Cynthia Glenn.....	Defendants,
of which	
Cynthia Glenn.....	are the Appellants,
and	
Kenneth Curtis.....	is the Respondent.

PETITION AND MOTION TO WITHDRAW FROM REPRESENTATION

THE DODD LAW FIRM, LLC

Michael B. Dodd
SC Bar No.: 100599
The Dodd Law Firm, LLC
13 Sevier Street
Greenville, SC 29605
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September 7, 2022

Attorney Michael B. Dodd of The Dodd Law Firm, LLC, who did represent Kenneth Curtis in the circuit court action related to this matter, does now file this motion to withdraw from representation pursuant to Rule 264 of the South Carolina Appellate Court Rules ("SCAR"). This motion is based upon justifiable cause, that Kenneth Curtis has, since the day the final order in the circuit court case was issued on November 17, 2020, numbered 2020-CP-23-00939, instructed counsel, Michael B. Dodd not to represent him in any appeal of this matter. Additionally, Kenneth Curtis, by virtue of his express desire that Michael B. Dodd not represent him on appeal, has consented to this motion pursuant to Rule 264(b) SCAR. Michael B. Dodd has given written notice to Kenneth Curtis multiple time since November 17, 2020, that he would not be representing him on appeal, and Mr. Curtis has informed Michael B. Dodd that he would retain other counsel. Mr. Curtis has been provided a copy of this petition and motion as well and has notice that Michael B. Dodd seeks to withdraw from representation. Kenneth Curtis has not responded to any communications sent from Michael B. Dodd regarding this matter.

Michael B. Dodd prays and asks this court to grant this petition and motion based upon justifiable cause, and based upon the express instruction and consent of Kenneth Curtis, and asks that this court issue an order pursuant to Rule 264 SCAR that Michael B. Dodd is hereby withdrawn and relieved s counsel for Kenneth Curtis in this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael B. Dodd", written over a horizontal line.

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Cynthia Glenn

579 W Circle Road
Gray Court, SC 29645

Petitioner, Pro se

Kenneth Curtis
113 Edwards Road
Marietta, SC 29661

And via email: kenprivacypro@gmail.com

Respondent

A handwritten signature in black ink, appearing to read "Michael B. Dodd", written over a horizontal line.

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