

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of Kenneth Curtis, and asks that this court issue an order pursuant to Rule 264 SCAR that Michael B. Dodd is hereby withdrawn and relieved s counsel for Kenneth Curtis in this case.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". The signature is written in a cursive style with large, fluid letters. It is positioned above a horizontal line.

Michael B. Dodd
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September 7, 2022

Cynthia Glenn

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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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