

RECEIVED

Feb 07 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
THE HONORABLE CHARLES B. SIMMONS, JR., MASTER-IN-EQUITY

Appellate Case No. 2022-001578
Case No.: 2018-CP-23-03712

Francisco Nicolas Miguel, Respondent,

v.

Palmetto Asset Investments, LLC, Gabriel Angel Prestegui Gomez, and A. Kevin Hunter, II,
Greenville County Tax Collector, Defendants, Of Whom Palmetto Asset Investments, LLC is

The Appellant.

MOTION TO BE RELIEVED AS COUNSEL

The undersigned has acted as counsel for Francisco Nicholas Miguel at the trial level in the above captioned matter. Consistent with Rule 407 of the Appellate Court Rules, and specifically, Rule 1.16(b) of the Rules of Professional Conduct, there is at least one ground which supports the permissive withdrawal of the undersigned counsel where: (b)(1) withdrawal can be accomplished without material adverse effect on the interest of the client; (b)(5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services or payment therefor and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; (b)(6) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; and/or (b)(7) other good cause for withdrawal exists.

The undersigned attempted to resolve the bases for withdrawal in good faith to no avail. This Petition is filed in the early stages of the present appeal, and withdrawal can be accomplished without any material adverse effect on the interests of the Respondent.

By service of this Petition, opposing counsel is hereby notified of this petition.

Respectfully submitted,

Hyde Law Firm, P.A.

s/ Samantha N. Larkins

Max T. Hyde, Jr. (SCB #17014)

Samantha N. Larkins (SCB #102790)

360 E. Main Street, Suite One

Spartanburg, South Carolina 29302

T: 864-804-6330

F: 864-804-6449

max@maxhydelawfirm.com

samantha@maxhydelawfirm.com

*ATTORNEYS FOR FRANCISCO NICOLAS
MIGUEL*

RECEIVED

Feb 07 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
THE HONORABLE CHARLES B. SIMMONS, JR., MASTER-IN-EQUITY

Appellate Case No. 2022-001578
Case No.: 2018-CP-23-03712

Francisco Nicolas Miguel, Respondent,

v.

Palmetto Asset Investments, LLC, Gabriel Angel Prestegui Gomez, and A. Kevin Hunter, II,
Greenville County Tax Collector, Defendants, Of Whom Palmetto Asset Investments, LLC is

The Appellant.

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order RE: Methods of Electronic Filing and Service Under Rule 626 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), the undersigned employee of Hyde Law Firm, P.A., counsel for the Respondent Francisco Nicolas Miguel, does hereby certify that service of the Petition for Withdrawal of Counsel was made upon all counsel of record by email only at the below email addresses on this 7th day of February, 2023, as follows:

Jeffrey T. Spell
jeff@jeffspell.com

Christopher R. Antley
cantley@greenvillecounty.org

Hyde Law Firm, P.A.

s/ Samantha N. Larkins

Max T. Hyde, Jr. (SCB #17014)

Samantha N. Larkins (SCB #102790)

360 E. Main Street, Suite One

Spartanburg, South Carolina 29302

T: 864-804-6330

F: 864-804-6449

max@maxhydelawfirm.com

samantha@maxhydelawfirm.com

*ATTORNEYS FOR FRANCISCO NICOLAS
MIGUEL*

RECEIVED

Feb 07 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
THE HONORABLE CHARLES B. SIMMONS, JR., MASTER-IN-EQUITY

Appellate Case No. 2022-001578
Case No.: 2018-CP-23-03712

Francisco Nicolas Miguel, Respondent,

v.

Palmetto Asset Investments, LLC, Gabriel Angel Prestegui Gomez, and A. Kevin Hunter, II,
Greenville County Tax Collector, Defendants, Of Whom Palmetto Asset Investments, LLC is

The Appellant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is employed in the Law Office of Hyde Law Firm, P. A. 360 E. Main Street, Spartanburg, South Carolina, South Carolina, and is a person of such age and discretion as to be competent to serve papers.

That on February 7, 2023, she served a copy of the Petition for Withdrawal of Counsel on the person hereinafter named by placing a copy in a postpaid envelope addressed to the person named below at the place and address stated below, and by depositing said envelope and contents in the United States Mail.

Francisco Miguel
725 Palmetto Avenue
Greenville, SC 29617

By: Cindi Whitenight
Cindi Whitenight, Paralegal



HYDE
LAW FIRM, P.A.

RECEIVED

Feb 07 2023

SC Court of Appeals

Max T. Hyde, Jr.
Samantha N. Larkins

February 7, 2023

Francisco Miguel
725 Palmetto Avenue
Greenville, SC 29617

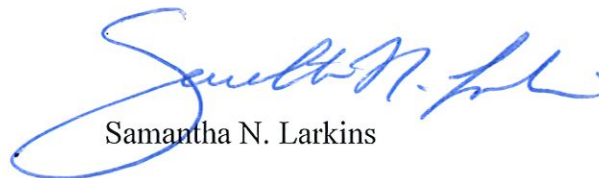
***Re: Francisco Nicolas Miguel v. Palmetto Asset Investments, LLC, Gabirel Angel Prestegui Gomez and A. Kevin Hunter, II, Greenville County Tax Collector
Appelate Case No.: 2022-001578
C.A. No. 2018-CP-23-03713***

Dear Francisco:

Enclosed is a copy of the Petition for Withdrawal of counsel, along with a Certificate of Service that has been sent to the Court of Appeals.

With kind regards, I am,

Sincerely,



Samantha N. Larkins

Enc.
SNL/cmw



HYDE
LAW FIRM, P.A.

RECEIVED

Feb 07 2023

SC Court of Appeals

Max T. Hyde, Jr.
Samantha N. Larkins

February 7, 2023

The South Carolina Court of Appeals
c/o Ms. V. Claire Allen
1220 Senate Street
Columbia, SC 29201

Re: *Francisco Nicolas Miguel v. Palmetto Asset Investments, LLC, Gabirel Angel Prestegui Gomez and A. Kevin Hunter, II, Greenville County Tax Collector*
Appellate Case No.: 2022-001578
Case No.: 2018-CP-23-03712

Dear Ms. Allen:

I have enclosed herewith a bound copy of the Petition for withdrawal of counsel, two (2) certificate of service, along with a check for filing fees in the amount \$50.00.

With kind regards, I am,

Sincerely,


Samantha N. Larkins

Enc.
SNL/cmw

Cc: Jeffrey T. Spell, Esq.
jeff@jeffspell.com

Christopher R. Antley
cantley@greenvillecounty.org

Francisco Miguel
725 Palmetto Avenue
Greenville, SC 29617