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May 02 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Court of Common Pleas Judge

Appeal Case Number: 2023-000491
Lower Court Case No. 2021-CP-40-00895

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR RESIDENTIAL
ASSET SECURITIZATION TRUST 2005-A8CB
MORTGAGE PASS-THROUGH CERTIFICATES
SERIES 2005-H

Respondent,

v.

JOHN C. NELUMS, DELMARSHI NELUMS, and
WOODLAKE HOMEOWNERS' ASSOCIATION,
INC.,

Defendants,

Of Which JOHN C. NELUMS and DELMARSHI
NELUMS are the Appellants.

**MOTION TO BE RELIEVED AS COUNSEL FOR
APPELLANTS AND TO PROVIDE APPELLANTS
WITH ADDITIONAL TIME TO FILE THEIR BRIEF**

Sean Adegbola and Adegbola Law Firm, LLC, move to be relieved as counsel for Appellants and as grounds state that Appellants have refused to communicate with Mr. Adegbola as to the pending appeal and also that Appellants are in breach of their contract with Adegbola Law Firm, LLC.

In view of this Motion, and the fact that Mr. Adegbola was retained as primary appellate counsel, it is requested that Appellants be given thirty (30) additional days to file their Brief.

WHEREFORE, Sean Adegbola. and Adegbola Law Firm, LLC, move to be relieved as counsel for Appellants for the reasons set forth, and for any other and further relief which is just and proper.

May 1, 2023

/s/ Jeff Barnes, Esq.

Jeff Barnes, Esq.

PHV withdrawing counsel

W.J. Barnes, P.A.

1515 North Federal Highway, Suite 300

Boca Raton, Florida 33432

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e-mail: jeff@wjbarneslaw.com

/s/ Sean Adegbola

Sean Adegbola, Esq.

Attorney for John Nelums

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PROOF OF SERVICE OF MOTION TO BE
RELIEVED AS COUNSEL FOR APPELLANTS AND
TO PROVIDE APPELLANTS WITH ADDITIONAL
TIME TO FILE THEIR BRIEF

I certify that I have served the Motion to be Relieved as Counsel for Appellants and to Provide Appellants with Additional Time to File Their Brief upon Respondent by depositing a copy of the subject Motion in the United States Mail, postage prepaid, on May 2, 2023, addressed to Respondent's attorney of record, John S. Kay, Esq., Hutchens Law Firm LLP, Counsel for Respondent, 240 Stonebridge Drive, Suite 400, Columbia, South Carolina 29210 and by e-mailing a copy of the Notice of Appeal to Mr. Kay as well.

May 2, 2023

/s/ Jeff Barnes, Esq.
Jeff Barnes, Esq.

/s/ Sean Adegbola, Esq.
Sean Adegbola, Esq.

PHV withdrawing counsel
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